

# 2013

## 2GP Preferred Options Consultation Phase Report



### **SECOND GENERATION PLAN**

A NEW  
DISTRICT PLAN  
FOR DUNEDIN

[WWW.DUNEDIN.GOV.T.NZ/2GP](http://WWW.DUNEDIN.GOV.T.NZ/2GP)



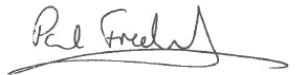



**City Development**

**February 2014**

**2GP Preferred Options Consultation Phase Report**

***Dunedin City Council Second Generation District Plan***

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## **1.0 Introduction**

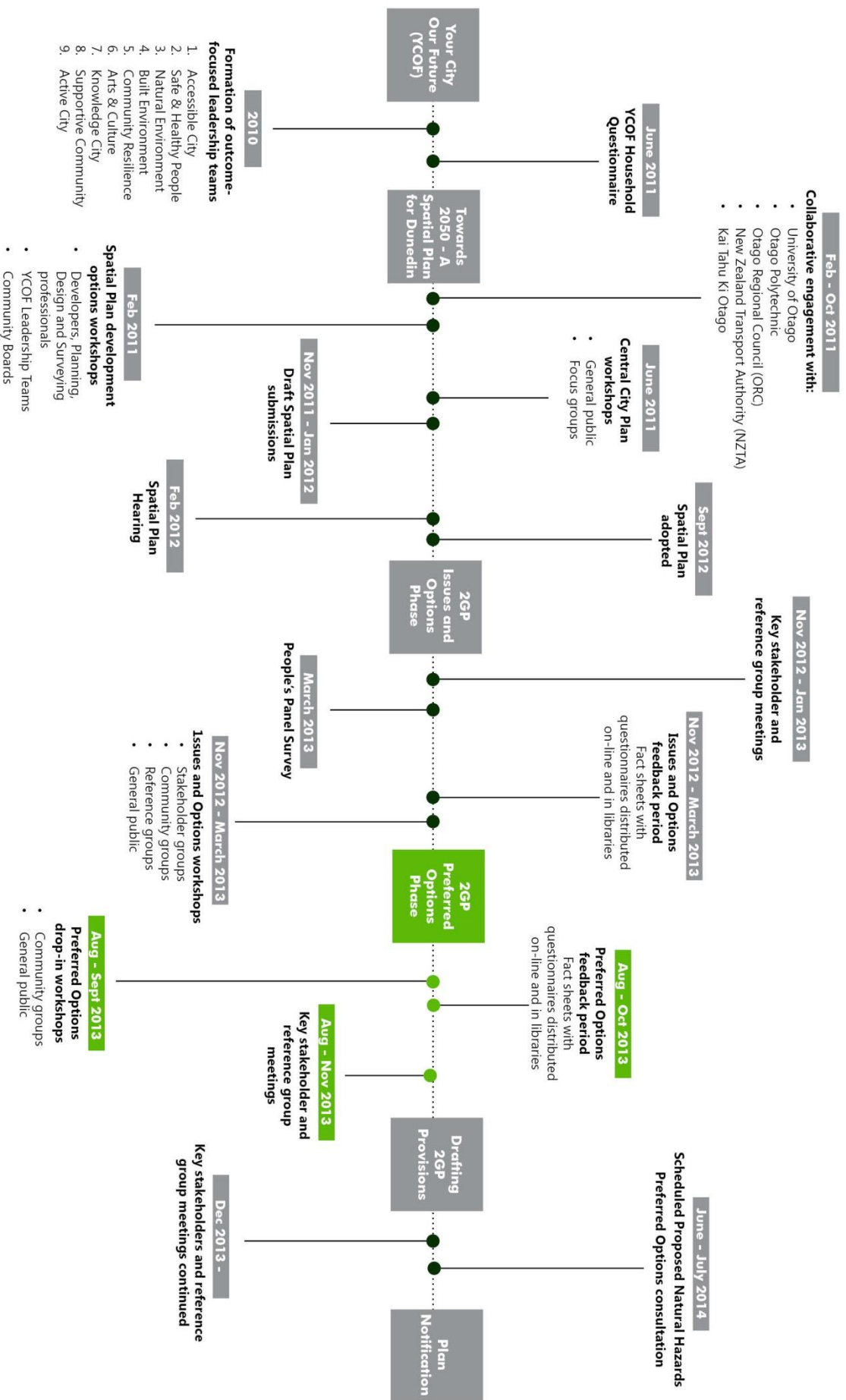
The Dunedin City Council (DCC) is reviewing the operative District Plan (2006) to prepare a new Second Generation District Plan (2GP). As part of the development of the 2GP, a Preferred Options consultation phase was undertaken from August to September 2013. This report outlines the process used for this consultation phase and presents the results of the feedback received.

## **2.0 Background**

### **2.1 2GP Consultation**

The Preferred Options consultation was the fourth phase in the development of the 2GP. The diagram on the following page illustrates the overall consultation and engagement undertaken for the 2GP, highlighting the Preferred Options consultation phase in green.

## 2GP | Consultation and Engagement Timeline | Preferred Options Phase





## 2.2 Preferred Options consultation phase

The purpose of this phase was to collect feedback on the goals and proposed changes for the reviewed sections of the 2GP, including preferred options for zone boundaries and rules.

This phase followed the Issues and Options phase (November 2012 to March 2013). Overall, there was general support for the issues identified and the general direction of changes, as well as additional ideas and suggestions which are being worked through.

Based on the preferred options, more detailed work has been completed to identify zone boundaries, the status of activities in different zones and specific rules in relation to performance standards and other rules.

The Preferred Options phase was not a formal submission process, but was designed to be used by the DCC planners as an essential part of their options assessment as required by Section 32 of the Resource Management Act 1991 (RMA). This phase was also an important opportunity for the community and key stakeholders to provide input into sections of the 2GP while they are in the development stage, and before formal Plan notification, submissions and hearings.

## 2.3 The consultation process

The Preferred Options consultation consisted of the following methods of engagement.

1. **Question and Answer (Q&A) Sheets:** The Preferred Options were grouped into 19 Q&A sheets, each relating to a different environment or set of activities. The sheets summarised the goals for managing the environment, and the key changes being proposed in the 2GP. The Q&A sheets provided an overview of 2GP zones and activities provided for, and many of the proposed performance standards for certain activities. The Q&A sheets were categorised under the following headings:
  - A. Introduction
  - B. Strategic Directions
  - C. Residential
  - D. Future Urban Development
  - E. Commercial
  - F. Rural and Landscape
  - G. Rural Residential
  - H. Industry
  - I. Major Facilities
  - J. Community and Recreation
  - K. Heritage
  - L. Renewable Energy Generation
  - M. Natural Hazards
  - N. Natural Environment and Biodiversity

2. **Proposed zoning maps:** The Preferred Options included maps of the proposed zones that were described in the Q&A documents. These maps were made available as part of the information on display at public drop-in sessions and electronically on the DCC website. The location of each zone boundary proposed for the 2GP has been determined by reviewing and taking into account:

- existing zone boundaries;
- the objectives of the proposed zone;
- corrections of any known existing problems with zone boundaries;
- up to date information, data and mapping of natural resources and natural hazards; and
- some identified adjustments to recognise current land uses, where appropriate.

The zone maps presented as part of the preferred options are the 'first cut'. The zone boundaries will be refined as a result of the preferred options consultation on the overall management approaches, on-going stakeholder feedback and detailed review of mapped zone boundaries prior to notification of the 2GP.

3. **Public workshops:** 11 drop-in workshops were held at various locations in the district. The workshops were to gather feedback from community groups and the general public. Maps, display posters, Q&A sheets and staff were available at workshops as well as access to electronic maps. The public drop-in workshops focussed on the 2GP but also had displays and information on the draft Integrated Transport Strategy (consulting at the time) and the Centres Improvement Programme. The location and dates of these workshops can be found in [Appendix 1](#).

4. **Feedback forms:** Each of the Q&A sheets had a feedback form attached relating to the content. The feedback forms asked general questions about:

- whether respondents agreed with the goals;
- what respondents thought about the proposed changes; and
- which option respondents preferred for specific management approaches.

Respondents were encouraged to complete these feedback forms and return them with a general feedback form. Forms could be returned using the pre-paid postage on the general feedback forms or at one of the workshops. For a full list of respondents, see [Appendix 2](#).

5. **Stakeholder workshops:** 13 workshops were held for individual groups and stakeholders on request. A list of the stakeholders can be found in [Appendix 3](#).

6. **Reference group meetings:** Meetings were held with reference groups, addressing preferred options related to topics covered by the reference groups. The groups were:

- Surveyors reference group
- Designers reference group
- Developers reference group
- Natural environment reference group
- Rural reference group
- New Zealand Historic Places Trust (NZHPT)
- Heritage Building Owners

A list of reference group meeting dates can be found in [Appendix 4](#).

Further detail on the Preferred Options consultation process, including the proposed zoning maps, the Q&A sheets and the feedback forms, can be found on the DCC website in the 2GP Documents page: <http://www.dunedin.govt.nz/whats-on/2gp/docs-page>

These methods of engagement involved a total of 476 responses during the consultation period. Note that some participants may have used multiple methods of feedback, and is therefore possible that they have provided multiple responses. The breakdown of participants is shown in Table 1 below.

**Table 1 - Breakdown of Preferred Options participants**

<b>Preferred Options consultation method</b>	<b>Number of participants in attendance or responses received</b>
Written feedback	102
Public workshops	136
Individual stakeholder meetings	219
Reference Group meetings	19
<b>Total number of responses</b>	<b>476</b>

### 3.0 Feedback results

The following section summarises the responses received through the feedback forms and workshops, as well as general feedback received from groups and organisations. For each sub-topic, opposing or constructive comments are outlined, followed by supporting comments in the highlighted text. The results are presented using the Q&A sheet topics and sub-topics.

The distribution of the number of responses received on each topic is outlined in Table 2 below, as well as 'Other' comments falling outside of these topics.

**Table 2 - Number of respondents by Q&A sheet topic**

Q&A sheet topic	Number of respondents
Strategic Directions	11
Residential Zones	26
Residential Activity – Performance Standards	21
Future Urban Development Zones	5
Commercial Zones	17
Commercial Activity – Performance Standards	8
Rural Zones and Landscape Overlay	21
Rural Zones and Landscape Overlay – Changes to the Management of Residential Activity	21
Information for Farm Owners in the Rural Environment	2
Rural Residential Zones	12
Industry	6
Major Facilities Zone	4
Major Facilities – Port	14
Community and Recreation Activities	8
Heritage	14
Renewable Energy Generation	17
Natural Hazards	8
Natural Environment and Biodiversity	12
Other	10

### 3.1 Strategic Directions

The Strategic Directions Q&A sheet outlined the eight strategic themes proposed to establish the overall management approach for the 2GP. Each theme presented the 'first cut' of the objectives, policies and methods.

Feedback was sought on whether the proposed Strategic Directions capture what should be included in the 2GP as the key land use planning objectives and policies.

Table 3 below presents the number of respondents who provided feedback for each Strategic Direction.

**Table 3 - Number of respondents by Strategic Direction**

<b>Strategic Direction</b>	<b>Number of respondents</b>
Dunedin is Environmentally Sustainable and Resilient	7
Dunedin is Economically Prosperous	2
Dunedin is a Memorable and Distinctive City with a Strong Built Environment and Natural Character	2
Dunedin has Strong Social and Cultural Capital	3
Dunedin has an Attractive and Enjoyable Built Environment	1
Dunedin has Affordable and Efficient Public Infrastructure	1
Dunedin has Quality and Affordable Housing	3
Dunedin is a Compact City with Resilient Townships	4

### 3.1.1 Dunedin is Environmentally Sustainable and Resilient

Seven respondents provided feedback on this Strategic Direction, mostly in support, with a number of suggestions for alterations and amendments to the objectives and policies.

#### **Objective 1 – Climate change**

- Policy 1: Include management of impacts of coastal erosion – a significant effect of climate change and sea-level rise that should be identified.

#### **Objective 2 – Fuel price volatility**

- Add lower energy demand homes and workplaces – ie buildings that require less energy.
- Although it is good to see local food production included specifically here, this is not the only 'driver' for increasing capacity.
- Fully support the methods concerning high class soils and community gardens. With regard to the latter, consideration should be given to adding two further categories – allotments and urban farms.
- It would be useful to clarify the definition of 'community garden' (eg not-for-profit, quasi-commercial).
- Should not be limited to petroleum and prices; but be broadened to 'fossil fuels' and prices and other risks in security of availability, supply and use.
- Support the emphasis on protecting high class soils for food production and wonder if the policy can extend to the widening of local production of other goods and services.
- It is worth being more explicit about this.

#### **Objective 3 – Biodiversity**

- As a significant part of Dunedin's indigenous biodiversity is on private land, Federated Farmers are cautious at the proposal to 'extend' these areas and improve connections.
- Need more detail on the potential impacts on, and assistance offered to, landowners.
- With regard to the methods, consideration should be given to the need to ensure that such conditions of covenants and other conditions to protect or extend biodiversity are properly met.
- Policy 2: Urge the DCC to be more vigilant in ensuring conditions are met in a timelier manner with stricter penalties for non-compliance.

#### **Objective 4 – Environmental performance**

- Broaden methods to better facilitate utilising sun's energy and energy conservation in building design.
- Policy 2: This could be strengthened with specific reference to the potential for storm-water and waste-water management in supporting food gardens.
- Suggest local electricity generation be placed under this.

#### **Objective 5 – People's health and safety**

- Add policy on liquefaction.
- Very deficit-driven – want strategies that promote physical activity (e.g. cycling).

- Save The Otago Peninsula supports the objective '*Areas of indigenous biodiversity are extended with improved connections and resilience*'.
- Objective 3: Biodiversity, Policy 2: Purakaunui Environmental Group strongly agrees that the plan needs to control the amount, type, scale and design of subdivision activities.
- Objective 4: Environmental Performance: Our Food Network Dunedin endorses this objective. Strongly support Policy 2 ('*Enable and encourage on-site stormwater and wastewater management*').
- Agree with intentions and applaud the intent of increasing indigenous plantings in the greater Dunedin area, and the intention of whole-of-property management.

### 3.1.2 Dunedin is Economically Prosperous

Two respondents provided feedback on this Strategic Direction, both were supportive and one provided guidance.

#### **Objective 1 – Protection of land important for sustainable economic prosperity**

- There is a need to be cautious in respect to the Strategic Direction outlining intent to ensure that the 'most productive land' is identified and specifically afforded protection. While it is agreed that this is important, the DCC should approach this cautiously, as its impact on private land use decisions assumes the DCC is better placed to make judgements on value than private land users, and creates both 'winners' and 'losers' through planning provisions that zone some land as open to subdivision and land use change while other areas are not.

- Our Food Network strongly endorses Objective 1: Protection of Land.
- Federated Farmers supports the discussion document's acknowledgement that Dunedin's rural environment is essential to the city's environmental, social and economic wellbeing.

### 3.1.3 Dunedin is a Memorable and Distinctive City with a Strong Built Environment and Natural Character

Two respondents provided feedback on this Strategic Direction. Both suggested amendments to the current objectives.

#### **Objective 2 – Natural character of Dunedin's coastal environment**

- The proposal to 'maintain or enhance' the natural character of Dunedin's coastal environment does not provide any clarity around what the strategic intent, or underlying need is. If there has been a significant deterioration of the coastal environment, this would arguably justify an enhancement approach. If there is contentment with the status quo, we would prefer the words 'or enhance' are removed so as to provide greater clarity.

#### **Objective 3 – Natural character of outstanding and significant landscapes**

- We ask that DCC recognise that many outstanding and significant landscapes exist within working farm environments, and, therefore, any potential loss of ability to make land use decisions and/or loss of value to landowners should be considered.
- Does there need to be wording in this section so that cultural heritage will be a consideration in outstanding and significant landscapes, eg Mapoutahi Peninsula off Mihiwaka? Or is that point covered substantially elsewhere?

- Agree with the strategic intent of Objective 3 that '*the natural character of Dunedin's outstanding and significant landscapes is maintained*'. Federated Farmers supports the DCC's 'hold the line' approach to outstanding and significant landscapes.

### 3.1.4 Dunedin has Strong Social and Cultural Capital

Three respondents provided feedback on this Strategic Direction. Comments were all supportive with one suggestion to enhance public open spaces.

#### **Objective 1 – Social and cultural facilities and spaces**

- It is critical that Dunedin retains/reinvigorates wild spaces throughout the urban and rural aspects of the city, where children can play and enjoy untamed natural spaces and where adults can exercise, spend time and be replenished. Would like to see a greater acknowledgement of managing spaces for wilderness experiences in either this or the following Strategic Direction.
- Support policy on strong social/cultural capital – especially strategies to promote physical activity, healthy food, smoke-free and responsible use of alcohol at events.
- Our Food Network fully supports this section but would urge the inclusion of local food production, distribution, sharing and celebration as specific ways of building social and cultural capital.
- Great to see the emphasis on the relationship/importance of natural environment, as well as built environment to society and culture in Objective 1, eg Woodhaugh Gardens, also many suburban spaces.

### 3.1.5 Dunedin has an Attractive and Enjoyable Built Environment

One respondent provided feedback on this Strategic Direction, suggesting a number of changes.

- It is not clear that this section supports managing the city centre's built environment so that there can be a move to many more pedestrian precincts. Would like the 2GP to allow all city centre blocks to become completely vehicle-free (other than delivery vans, etc.) and service the needs of citizens and enterprise, in the way that New York, for example, has revitalised Times Square and other precincts.
- Don't agree with building and planting restrictions – better with recommendations.
- Would like to see the DCC consenting faster and cheaper.
- There needs to be an emphasis placed on promoting and encouraging pride and respect in the appearance/health of local streetscapes (eg within the university precinct).
- Applaud the emphasis on a compact city with convenient and supporting infrastructure.

### 3.1.6 Dunedin has Affordable and Efficient Public Infrastructure

One respondent provided feedback on this Strategic Direction.

- Aiming for greater efficiency in infrastructure use is important, and there is a role for strategic planning to play in achieving these aims; however, it is worth the DCC considering what role a development contributions or financial contributions charging regime may also play in incentivising efficient location of development (or in ensuring that the marginal costs imposed on the city's infrastructure are paid by those creating the costs).
- Agree with the strategic intent of Objective 1 that public infrastructure is used as efficiently as possible.



### 3.1.7 Dunedin has Quality and Affordable Housing

Three respondents provided feedback in support of this Strategic Direction with two suggestions for additional content.

#### ***Objective 2 – Housing is affordable in the long-term***

- Policy 2: There should be some reference here to the capacity for home food production where possible.
  - Would like to see more consideration to affordable housing and the NZ Productivity Commission's Housing Affordability Inquiry (March 2012).
  - Propose that methods address more than building solar design.
- Particularly support the objective relating to the standards and long-term affordability of housing.
  - Generally strongly support themes, objectives, policies and methods.
  - Our Food Network Dunedin supports this section.

### 3.1.8 Dunedin is a Compact City with Resilient Townships

Four respondents provided feedback on this Strategic Direction. One respondent was in agreement, two proposed amendments and one opposed some of the suggested restrictions.

#### ***Objective 1 – Clear urban and rural boundary with sustainably managed urban expansion***

- Policy 5: Our Food Network fully supports the objective but believe that a local food strategy might help in designing practicable methods for bringing this about.
  - Policy 5: Don't agree with rural-residential size restrictions or rural-residential sites solely for those involved in lifestyle farming – this cuts options for people's various needs and desires.
  - Affordable housing is affected by land availability and consenting cost/time – the consenting time and cost should be refined through stakeholder feedback and consultation. Efficient consenting will allow sustainable economic prosperity. Slow and expensive consenting will compromise the economic system and affect Dunedin's vibrancy.
  - The Strategic Directions should be guided by the Spatial Plan and should be flexible and evolve.
- Commend the DCC on the plan to adopt new road user hierarchy. The Southern District Health Board advocates that mobility impaired users should also be considered as a separate group within this hierarchy.
  - Generally strongly support themes, objectives, policies and methods.
  - In full support of this section, especially Objective 1: 'Clear urban and rural boundary', with its Policy 2 objective of avoiding productive rural lands.

### 3.1.9 General Strategic Directions feedback

The majority of feedback on Strategic Directions is covered above, but there were six respondents who made comments that did not relate specifically to one of the topics, or were broad in nature and related to many of the Strategic Directions. These comments included suggestions for linkages or holistic approaches throughout the Strategic Directions, and alternatives or additions to the current rules.

#### **Overarching strategies**

- It is a matter of urgency to develop a Local Food Strategy with explicit links to the other strategies.
- All Plan provisions need to be viewed through the lens of (global) climate change. Without that proviso, Dunedin is Economically Prosperous might well be directly opposed to the first, and paramount, Strategic Theme, Dunedin is Environmentally Sustainable and Resilient. The 2GP needs an explicit statement that there is an overarching commitment to minimising carbon emissions as a key part of the Plan – then these themes would pull together to enable Dunedin to forge a way to be a compact city with resilient townships, that is sustainable economically, environmentally and socially.
- Further actions the DCC could take to improve active edges and public transport usage while increasing safety include:
  - Move car parking from the city centre to the outskirts;
  - Pedestrianise the city centre;
  - Separation of pedestrians/cyclists from motor vehicles as much as possible; and
  - Reduce car parking within city centre developments.

#### **Rules**

- Agree with the goals and strategic directions for the 2GP but would suggest using non-regulatory methods often instead of, or in conjunction with, rules.
- It may have eight themes with no rules but the rules are mentioned 58 times in the rest of the document compared to only one mention about relaxing the rules – are we being overruled?

- Our Food Network commends the DCC on its evolving integrated approach to planning via its strategy statements on transport, economic development, energy and social well-being.
- These are strong themes, which together could contribute to future-proofing our city, and to supporting Dunedin to be an enjoyable, healthy, vibrant and inclusive place for residents, businesses and local communities.
- Blueskin Resilient Communities Trust supports the proposed Strategic Directions and approves them as stated, particularly the order of the strategic themes – no changes to themes or order.

## 3.2 Residential Zones

The changes proposed for the Residential Zones focused on zone densities and providing for activities. The Residential Zones Q&A sheet begins by outlining the goals for residential zoning based on the strategic objectives set out in the Strategic Directions. These objectives include protecting residential amenity, ensuring a range of housing choices, energy-efficient housing construction and limiting urban sprawl.

Table 4 presents the number of responses for each of the Residential Zone topics.

**Table 4 - Number of responses for Residential Zones**

<b>Residential Zones topic</b>	<b>Number of respondents</b>
Proposed changes and goals	5
Overlay Zones	2
Proposed Residential Zones	3
Medium Density Zones	13
South Dunedin Residential Zones	1
Townships (serviced)	1
Family flats	6
Education facilities	1
Visitor accommodation	1
Student hostels	1
Rest homes, retirement villages and supported living	2
Utilities	3

A number of additional sub-topics were also addressed in the Q&A sheet but received no responses. These included:

- Non-residential activities in Residential Zones
- Community and recreation activities
- Working from home
- Commercial activities

### 3.2.1 Proposed changes and goals

Five respondents provided feedback on the goals and proposed changes for Residential Zones. Comments were supportive overall but suggested that the approach was too restrictive in places.

#### **Goals**

- Goals are good – however, balance of choice requires some scrutiny, ie less Residential 1, more large lot choice – numbers and locations, especially close-in sites.
- Disagree with the goals for managing the residential environment.

#### **Proposed changes**

- Do not agree with turning areas like Queen Street north into Heritage Zones – this just makes the process of adding, altering or building new too prescriptive – it adds cost and little benefit.
- Should remove as many obstacles as possible for building new homes and reduce costs where possible.
- Fences should be solid where applicable.
- The Residential 1 change to a habitable room per 100m<sup>2</sup> is too restrictive.
- Give credits for rooms when more parks are created than minimum – there is very little incentive to create parking. Keep restrictions such as Heritage Zones to a minimum.

- Broadly agree with the 2GP changes proposed, especially those that restrict further green-field development (development which is completely unnecessary in a city with little population growth) and instead focus on locating people within the Central City.
- Support the proposed zone changes as an owner of multiple properties in Dunedin, and was pleasantly surprised when viewing the 2GP map of the various streets in Dunedin. Proposing a higher density of housing along main arterial routes throughout the current Residential 1 Zone is a great way to spread the load for future population growth.
- Agree with the goals for managing residential activity. For example, the provision for building granny flats makes sense and fits well with the overall goal of preventing needless urban spread.

### 3.2.2 Overlay zones

In addition to the base Residential Zones, the Q&A sheet also highlighted two overlay zones in the form of Heritage Precincts and Hazard Overlay Zones.

Two respondents made comments in support of the overlay zones, both suggesting further development.

- Support is given to the application of overlay zones, in particular the Hazard Overlay – residents in Waitati want to be better informed about the climate change risk to their properties. Be proactive in developing the Hazard Overlay, showing conservatism rather than optimism – ie better to assume a worse outcome than to plan for the best scenario and be proven wrong.
- It would be helpful if an overlay zone included sites/areas that the New Zealand Historic Places Trust are 'interested' in so that there are no further on-going surprises/hold-ups and extra costs to developers/builders/owners.

### 3.2.3 Proposed Residential Zones

The Residential Zones Q&A sheet outlined the new proposed zones for the urban environment. These included General Residential, Medium Density, South Dunedin Residential, St Clair Residential, Low Density Residential, Large Lot Residential, Townships (serviced), Townships (unserviced or semi-serviced), Settlements (serviced) and Settlements (unserviced or semi-serviced).

Three respondents provided comments on the proposed Residential Zones. The comments were mostly supportive of the proposed Residential Zones but expressed concern about the dependency and provision of reticulated services, patterns of development, zone density and the range of accommodation types available.

#### **Infrastructure**

- Don't let perceived infrastructure limitations dictate where people should live, other requirements should have priority – old Plan was bad in this area. Also 'in-house' judgement of these limits is open to opinion and varies on who you talk to.
- Ensure services are in place to support the higher density residential housing in Mosgiel – ie greater demand for stormwater and waste services with introduction of 'family flats' and on-going infill activities.

#### **Pattern of development**

- Zoning should reflect existing pattern of historic development much better than the current Plan. Eg better correlation with existing housing type/patterns and residential zoning – too much Residential 1 currently.

#### **Density**

- Dunedin Amenities Society has some concerns about the proposed Residential Zones and density considerations contained within the 2GP in relation to:
  - The effects of diminishment of garden and green areas, increased hard surface areas, building area and heights on urban biodiversity and urban biodiversity connectivity as this type of development reduces opportunities for urban biodiversity.
  - The effects of changes to housing density in terms of a reduction of urban connectivity for biodiversity and the impacts of increased population pressure on parking, noise, shade, hard surfaces, increased surface water, and increased infrastructural and utility development, will have on adjacent reserve areas such as the Town Belt.

#### **Housing choice**

- Support the need for greater flexibility in housing options given demographic changes and an ageing population. Suggest that the concepts embodied in papakainga and co-housing options may have merit in the consideration of housing options.

- Agree with the replacement of the current six Residential Zones with ten Residential Zones to better represent the diversity of residential realty and the opportunities and constraints therein.
- Generally heading in the right direction.
- Approach similar to current Residential 3 method is good as it provides flexibility and a choice of working situations.
- Agree with greater need for flexibility in the size and type of dwelling options available, across a range of locations and a range of housing choices.
- Zone densities based on a minimum size per habitable room are supported from a public health point of view.

### 3.2.4 Medium Density Zones

The proposed Medium Density Zone consists of areas formerly zoned Residential 1, 2, 3 and 4. The aim for this zone is to provide housing opportunities for people wanting to be closer to main services and facilities. The Medium Density Zone proposes to allow more than one residential unit on a site depending on the site size.

Thirteen respondents provided feedback on the Medium Density Zones, largely in support of the proposed zone. Changes were sought around how density would be calculated, the areas in which Medium Density Zoning would be applied, the relationship between the Heritage Overlay and the Medium Density Zone, and boundaries of the zone.

#### **Density approach**

- Density should be based on square metre of land area per habitable room. This should be based on what the present infrastructure can handle – not having density based only on habitable rooms and minimum site area for subdivision purposes. This will make it harder to redevelop old stock. By extending the heritage areas, they will become off limits for redevelopment.
- Not sure about splitting/combination of building density and people density. Limiting people density in the larger site zones is immaterial – also 'self-serviced' sites could be designed with capacity to suit the number of habitable rooms.

#### **Areas inappropriate for Medium Density housing**

- The performance standards to encourage higher density flat developments should not be applied across the University Zone, but to appropriate areas or sub-zones, so the unique single storey, Victorian-Edwardian domestic townscape of North Dunedin and its surrounds is not eroded by multiple flat developments.
- Providing Medium Density along the main arterial access routes/corridors is the wrong approach. Transportation requirements will make it near impossible to achieve the goals. The idea will also dilute preferable clusters of higher density around nodal centres.
- Too much Medium Density zoning is being offered and in areas that don't suit or reflect historical trends. Balance could be better/more appropriately located.
- Delete the Medium Density corridors.
- There is a serious disconnect between the physical implications of the Highgate cycleway proposal and the existing, let alone the proposed, intensification of residential and other uses along Highgate. It can be argued that much of the land adjacent to Highgate is already overdeveloped – the 2GP proposals look set to allow further intensification

#### **Heritage Overlay Zones**

- Previous requirement to apply for resource consent to ensure the character and appearance remained unchanged – seems at odds to be allowing the heritage value of the whole street to be degraded further by allowing further intensification of development.
- It is of concern that most of the Medium Density proposed rules could be in conflict with the rules for the Stuart Street Heritage Precinct: eg reduced ground-level outdoor living space, 200m<sup>2</sup> sites, number of habitable rooms, density of development, maximum height etc. The Stuart Street Heritage Zone standards must take precedence over the general rules for the Medium Density Zone in which it sits.

- Support policies in Medium Density areas that promote the renewal of older, poorly maintained housing in the student area below the town belt and along certain transport corridors in favour of more modern higher density housing.
- Support the higher limit for in-fill buildings in well serviced Residential Zones.
- Like the proposed Medium Density zoning, especially around centres.
- Agree with new standards reflecting existing Residential 3 methods – adjusted to reflect other areas throughout the city naturally.

### **Medium Density Zone boundaries**

In addition to the comments above about the Medium Density Zone, feedback was received from five respondents relating to the specific boundaries of this zone.

- Would like 56 and 56a Peter Street included in the Medium Density Zone to allow construction of multiple units – would be a huge asset to the Caversham community and perfectly suited to the goals of the new Medium Density zoning.
- The area of houses directly along the new motorway (that is from 111 to 163 Caversham Valley Road) are still to remain unchanged as General Residential zoning. These properties stand as those most affected by the widening of the road in terms of price devaluation – which has been significant. The opportunity to potentially recoup what has been a definite devaluation of the property price since the construction would be to change the zoning of these properties to Medium Density.
- Malvern Street not suitable for higher density housing because:
  - No bus services in weekends or night time (last bus at 6.15pm).
  - Would detract from the green/semi-rural outlook.
  - Most of street only developed on one side.
  - With play areas in Woodhaugh Garden and another one further up the valley, the area is best suited to families rather than students (or other single adults).
  - Concerns around standard of permeable surfaces (eg gravel or grass) that can present a poor appearance with a number of cars parking on it – good quality paving can look ok, not a problem to have several cars.
- Delete the proposal for a Medium Density Zone along Highgate – it will raise unrealistic expectations as to the redevelopment potential for a large number of very narrow sites. It will also cause needless worry for existing residents when they find out what the likely effects of the proposal on a neighbouring property may mean for them and their property.
- Basing increased density around bus routes is problematic – what happens if the bus company changes its routes and the people will still use their cars? The better option would be to have increased density around shopping centres so that people could walk to the local shops, thus supporting local businesses and getting them out of their cars.

### **3.2.5 South Dunedin Residential Zone**

The Q&A sheet outlines the preferred approach for South Dunedin, to maintain existing levels of development due to infrastructure limitations and the potential for issues arising from a high ground-water table and climate change.

One respondent provided feedback in support of the approach to the South Dunedin Residential Zone.

- Support a hold on further development in South Dunedin pending exploration of options relating to sea level rise. Good to see this matter is already being publically discussed.

### **3.2.6 Townships (serviced)**

The Q&A sheet set out that it is proposed to retain the minimum site size of 500m<sup>2</sup> for Port Chalmers and Brighton, and a higher minimum site size of 750m<sup>2</sup> for other serviced townships to preserve the amenity of those townships.

One respondent considered that the DCC had erred in the proposal to increase the minimum section size in Middlemarch, stating that the average age of the population in such rural towns is older, but not aged, as the sections are too big for the elderly to maintain. There is a demand for smaller units to allow people to stay in their local area, while it also creates local employment in the care industry.

### 3.2.7 Family flats

Unlike the current Plan, the 2GP will provide for family flats. The Q&A sheet explained that the intention for family flats is that they remain within the same site and ownership as the main residential dwelling with performance standards on size and scale.

Six respondents provided feedback on family flats, with two in clear support and four suggesting amendments to performance standards.

- Disagree with one room – need to allow couples to sleep in separate rooms.
- Do not wish to see the proliferation of out of character infill housing or granny flats in the Stuart Street Heritage Precinct. Family flats should be a Non-complying activity.
- Although for family members, this is not enforceable. It should be big enough for two bedrooms, so a relative or caregiver could stay, have a hobby room or somewhere to store excess furniture or mementos when they shift from their family home to a smaller flat.
- 'Family Flats' may be better termed as 'Minor Dwellings' or 'Minor Household Units'.

- Support 'granny flats' being a Permitted use in General Residential areas.
- In favour of allowing 'granny flats' as this will not only support the goal of concentrating Dunedin's urban population, but also recognise the needs of households incorporating multiple generations of whānau.

### 3.2.8 Education facilities

The Q&A sheet explained that early childhood centres with six to ten children will be a Permitted Activity and a Discretionary Activity beyond these numbers.

While the Q&A sheet only addressed early childhood centres, one respondent provided general comments on education facilities in Residential Zones.

- It is not clear from the Q&A sheets how new education activities will be provided for within these zones and/or if the Major Facilities Zone will provide for new activities as an overlay to these zones without the need for a plan change.
- At a first principle level, if new residential developments occur within these zones, education activities/schools should also be provided for, or at the very least, any new residential subdivision should be required to assess its educational capacity.
- Given the effects arising from an early childhood centre are generally well defined, an activity status of Restricted Discretionary is considered more appropriate for an early childhood centre catering for 10 children or more.

### 3.2.9 Visitor accommodation

The Q&A sheet explained that any visitor accommodation (including homestays for six or more guests, motels, hotels, campgrounds/holiday parks, backpackers and hostels) is proposed to be a Discretionary Activity in most Residential Zones, and a Permitted or Controlled Activity along some key streets in the Medium Density Zone. Visitor accommodation for up to five guests will be a Permitted Activity.

One respondent suggested alterations to visitor type accommodation.

- Density for motel/hotel type development should be calculated differently than family/long stay household units.



### 3.2.10 Student hostels

The 2GP proposes to recognise and provide for student hostels as a Discretionary Activity.

One respondent provided several comments on possible alterations to the proposed changes for student hostels.

- The proposed new definition of Student Hostels, which encompasses both high school hostels and colleges, may not be an appropriate method of recognition. There are only a handful of school hostels in comparison to colleges, of which there are over a dozen university-owned, private and affiliated institutions. School hostels also have lower student numbers compared to colleges. The DCC needs to carefully consider whether the environmental effects of both types of live-in accommodation are the same before deciding whether one definition and set of development standards is appropriate.
- Development standards for residential colleges outside the new Campus Zone need to allow for minor alterations without resource consent being required, to improve on the current circumstances where consent is required for minor projects where there is no likely adverse effect on the surrounding environment. Colleges are a well-established, largely unobtrusive part of the residential landscape, and therefore alterations should not require consent under the new plan.

- The University of Otago welcomes the inclusion of colleges as an accommodation type within the new Plan.

### 3.2.11 Rest homes, retirement villages and supported living

To accommodate an ageing population, the Residential Zone will provide for a range of retirement villages in different forms and scale. The Q&A sheet outlined that rest homes for up to 10 residents is proposed to be a Permitted Activity, while any larger will be Restricted Discretionary in the General Residential and Medium Density Zones.

Two respondents gave feedback, providing considerations and possible alterations to provisions for rest homes.

- Rest homes smaller than 20 residents are virtually not viable. Making 10 or more restrictive makes no sense.
- Plan needs to acknowledge the high number of elderly, and the increasing population, is going to put pressure on existing health and care services such as access to GPs and access to rest home/hospital-care beds for the elderly.
- Ensure there is provision for the establishment of new, and expansion of current, health and other community/residential care facilities.

### 3.2.12 Utilities

This sub-topic was not presented in the Preferred Options Q&A sheets. Three respondents made comments strongly supporting the inclusion of rules limiting the possible location and operation of cell-phone tower utilities, specifically in the Brighton area. This was in response to a proposal from 2 Degrees to establish a tower on a road reserve in the Brighton district.

- Where a road reserve is the proposed site, then the DCC should consider and consult where the community is affected.
- Provide rules/restrictions about where cell towers are allowed to be placed.
- There has been no consultation with Community Board/community – need to alter this for the future (including for visual impact of utilities).
- Telcos must be made to co-locate.
- No cell-masts within 500m of homes, schools, pre-schools, etc.
- No towers on ridgelines – if utilities will have visual impact on residential property then this should be considered under the RMA.
- Ability for the DCC to charge for use of public land.
- Reduce level of radio frequency emissions to 0.1 RE.
- Concerned about the health effects of a cell tower if installed on the lower Scroggs Hill Road. Understand that the DCC cannot change/go against the National Standards for Telecommunication Facilities, but surely they can do something to protect their citizens. NZ Standards are way out of date.

### 3.2.13 Other Residential Zones feedback

A number of comments received from three respondents did not sit readily within the sub-topics and are presented below.

- Any zoning that supports ghettoism or other forms of stigmatisation is not supported – would be interested in ways that geographic labels (eg the psychotic triangle) are removed.
  - Support action that ensures the availability of land within city boundaries for food production – would increase the consumption of healthy produce and food security. This is of particular importance within residential and high deprivation areas. Consideration could be given to zoning to permit allotments on civic/publicly owned land, and the conversion of privately held land to allotments.
  - Problem with the pre-determined yield of residential units – who picks the pre-determined yield?
  - Water Bylaw boundaries in Blanket Bay and Curles Point should be residential and have water as of right – time to sort out Water Bylaw alignment.
  - The Waikouaiti Coast Community Board has identified potential for further development on the Edinburgh Street side of the Waikouaiti Rural Centre. The intent would be a unit size sufficient to accommodate land treatment of effluent and a moderate section size.
- Agree with durable-constructed energy efficient houses, resilient townships and efficient use of land and infrastructure.

### 3.3 Residential Activity – Performance Standards

The key strategic goals for managing design in the Residential Zone is to protect residential amenity at both the neighbourhood and site level by ensuring attractive streetscapes and maintaining or enhancing residents' privacy, enjoyment of private outdoor space, and access to their sites. The preferred approach included several changes to reduce the need for resource consent, tighter controls to reduce poor development, improving the effectiveness of standards and introduced new standards to resolve existing issues.

Table 5 below presents the number of responses for each Residential Activity Performance Standards topic.

**Table 5 - Number of responses received on performance standards for Residential Activity**

Residential Activity – Performance Standards topic	Number of respondents
Proposed changes and goals	2
Outdoor living space	5
Fencing	3
Garages and carports in front yards	2
Parking in front yards	2
Parking requirements	9
Site coverage and impermeable surfaces	3
Minimum residential unit sizes	4
Accessory buildings	1
Height	4
Height in relation to boundaries	2
Removal of resource consent triggers	1
Visitor parking	1

A number of additional sub-topics were also addressed in the Q&A sheet but received no responses. These included:

- Setbacks from the road
- Internal boundary setbacks
- Landscaping

### 3.3.1 Proposed changes and goals

Two respondents provided feedback on the proposed changes and goals for performance standards for residential activity. One stated that they did not agree with the goals and thought there were other goals that were important (but did not elaborate on this), and the second respondent provided comments on further possible goals.

- Agree with the goals for managing residential activity and also suggest adding two additional goals:
  1. Enabling warm and cosy homes – this relates to solar positioning and durability.
  2. Providing accurate disclosure of known hazards – good Hazard Overlay and up-to-date climate change science.

### 3.3.2 Outdoor living space

The Q&A sheet explained that the 2GP proposes to require additional performance standards for outdoor living space to improve quality and quantity, such as a location that is directly accessible from a living area.

Five respondents provided feedback on outdoor living space, with one respondent in full support of the changes and four expressing concerns over outdoor living space for student flats and the challenge of achieving the requirements.

#### ***Student housing***

- As many student flats lack good outdoor living space, performance standards regarding outdoor areas must ensure that these are not configured as cramped areas of bare concrete, so new flat developments improve the street amenity of the area as well as providing an attractive modern living environment.
- Concern with the encouragement of multi-unit developments in the Medium Density Zone. The standards for outdoor space are not clearly outlined for the Medium Density Zone. Particularly concerned with the student area around the university and whether the unique 'vibe' of student front yard-street interaction will be maintained. Currently, flats that gain the sun on the front porch and yard are often utilised by residents. Similarly, back yards are used the same way and allow residents to interact with their neighbours. Take this into account when making rules for outdoor space for multi-unit developments.

#### ***Impracticality of outdoor living space requirements***

- Too much emphasis placed on protecting your neighbour – has this been a problem? Owners will be forced to build to the north boundary to protect neighbours from shading. Existing sites may not be wide enough to achieve the more stringent outdoor living requirements.
- Don't agree with the requirement for extra stringent controls over current rules, eg outdoor living spaces required to be bigger, in one cohesive place and adjacent to a living space – too difficult to achieve, especially on existing/brownfield sites where majority of work will be. These requirements can be reduced/averaged in medium/higher density multi-development situations where outdoor space is expected to be a lower priority.
- With Dunedin's hilly suburbs, having an outdoor living space with a grade of 1:12 is sometimes not possible unless terraced or having a deck over the living space.

- Agree with these changes, particularly as to location on the property and that these spaces cannot be used for car parking/use.
- The suggested performance standards that include diameter circles and restrict location and the amount of paving are welcomed, and it is hoped these will prove to be workable, enforceable and will serve to offset the effects of requiring less overall outdoor space.

### 3.3.3 Fencing

To improve streetscape amenity and safety, the 2GP proposes to introduce new performance standards to allow fences up to 1.4m, and up to 2m where the section above 1.4m is visually permeable.

Three respondents provided feedback on proposed fencing performance standards. One respondent was in agreement with the changes, while two suggested alterations.

- Strongly disagree with scheme changes creating a fishbowl for residential buildings. Ok for crime reduction in industrial areas – should be permeable visibility fencing, but some customers require privacy and a solid fence to achieve this. In certain areas, for instance, CDC Rappat Investments put covenants in place that there be no solid fencing as in a semi-rural native bush environment – should be more consultation on this subject.
- Having solid fences up to 1.4m is too high for people sitting in cars to see if anybody is coming when reversing out of a driveway. A better height would be 1.2m, but only down for 2m either side of the driveway and then any front fence 2m either side.

- Agree with these changes, as long as dogs will not be able to threaten passers-by.

### 3.3.4 Garages and carports in front yards

The Q&A sheet explained that the preferred approach is to allow garages and carports of a limited size in front yards in the General Residential Zone and some other Residential Zones as a Permitted Activity with performance standards.

Two respondents suggested alterations.

- There are examples of added carports and garages in front yards where the frontage of the house has been severely compromised (eg space-wise, blocking light into main rooms) and is an aesthetic disaster in terms of use of space and lack of appropriate style. Neither this, nor the practice of vehicle parking on the fronts of properties "contributes positively to the streetscape environment". There are real risks that, if garages and carports no longer need consents, the Strategic Direction – *Dunedin has an Attractive and Enjoyable Built Environment* – will be greatly undermined. The haphazard placement of such secondary buildings on properties can be seen in many parts of the city to impact negatively on the streetscape, which without planning consent, will increase.
- Garage doors should not open out over footpaths.

### 3.3.5 Parking in front yards

To maintain amenity values, new performance standards will be introduced to specify the percentage of the front yard that can be occupied for parking.

Two respondents provided feedback, neither opposing the approach but both suggesting direction for provisions.

- Individual cases might need assessing in allowing cars to park in front or wherever on the property. Eg how can there be space for one and a half cars?
- The University would not support the option of continuing to require on-site parking for new developments as this would be difficult to achieve on small lot sizes without losing quality outdoor space, and would not encourage greater uptake of sustainable transport.

- The University supports the proposal to restrict front yard space that may be used for car parking to a set percentage in the Medium Density Zone. Front yard paving has led to a significant degradation of the street scene of North Dunedin as landlords attempt to accommodate tenant vehicles and reduce the need for garden maintenance. Removal of on-site parking also encourages alternative transport. There is no real need to use vehicles in North Dunedin due to its close proximity to the central city and campus.

### 3.3.6 Parking requirements

The Q&A sheet outlined the alternatives to on-site parking requirements being considered. These include not requiring on-site parking where no constraints on on-street parking exist, managing on-street parking through a ticketing option where there are constraints for on-street parking, and, in areas where there are opportunities to improve on-street parking, explore the option of allowing a financial contribution to be made in lieu of meeting parking requirements to fund improvements to on-street parking.

Nine respondents provided feedback. Eight made comments expressing concern or suggesting alterations, and one respondent supported the preferred parking requirements.

#### ***Preferred approach to managing car parking***

- In areas where there is competition for on-street parking, don't require on-site parking but manage on-street parking through a permit or long-stay ticketing option to give priority to residents using on-street parking and ensuring there are enough parks for tradespeople and other shorter-stay visitors to those areas, and, only if there are still spaces available, providing for commuters.
- Decrease car-parking costs in Central City.
- Better public transport.
- Ratepayers get parking rights in their neighbourhood ahead of those parking for work.
- Every case judged on its merit – ie two bedroom unit with two car garage and space outside for two car visiting.
- Given the obvious pressure on free street parking around campus, it would be advisable to counteract the removal of parking requirements with the introduction of a DCC permit system for residents to reserve space, particularly if the University's current parking protocol agreement with the DCC is scrapped and it is no longer required to provide more campus parking in conjunction with increases in student and staff numbers.
- New parking requirements are too onerous – two parking spaces for a three bedroom unit? Unrealistic, especially for close-in development locations/centres where walking and biking are achievable.
- 'Transportation' issues have generally controlled development in the past/currently – don't repeat this mistake – people spaces should take priority over car spaces.

#### ***Multi-unit developments***

- Need better controls on subdivision of houses into multiple dwellings, including 'studio apartments', to mitigate the present adverse effects caused by high demand for parking that exceeds the capacity of the street.
- Could have space-sharing rather than extra visitor type parking in multi-unit projects?

#### ***Location-specific parking requirements***

- Don't create any more car parks in St Clair. Our family is happy to walk two blocks which is the most we've ever had to walk.
- Kew – houses having extra bedrooms in basement is causing parking issues resulting in buses having difficulty navigating Skibo Street. Suggest limiting on-street parking in areas that are narrow.
- The implications of the establishment of a cycleway along Highgate will be to eliminate all on-street vehicle stopping and parking over almost the entire length of Highgate. There are few viable alternatives for where vehicles may be stopped or parked especially for service, tradespersons and constriction vehicles. Losing this could negatively affect local businesses in the area such as those in the 'dip'.

- Really liked the proposal for less car parks per unit, although from an owners' point of view, they are a valuable resource.

### 3.3.7 Site coverage and impermeable surfaces

The preferred approach to managing site coverage in the 2GP is to continue to specify maximum site coverage standards, varied across the different Residential Zones. New performance standards are proposed for permeable surfaces, also varying across the different Residential Zones.

Three respondents provided feedback. None of the respondents were in opposition to these performance standards, however, two suggested other possible options for impermeable surfaces.

- A solution to many South Dunedin residences being covered with 80-100% of impervious surface would be to base land area for each unit on the number of habitable rooms. As an alternative, have stormwater holding tanks that catch water off the roof when it rains and the overflow from the tank would then flow into the DCC's system. Because of different roof areas and tank sizes, and the delay in filling the storage tanks, the run-off into the DCC's stormwater drains would be staggered.
- Preference would be for properties to be covered where necessary – driveways, yards, etc, with semi-permeable solutions (ie a surface where 50% of the area in question is covered – not bricks, stones or tiles). There need to be regulations for the provision of garden/grass/shrub/soil areas – cannot see a requirement for the provision of such natural spaces, so that householders/unit-dwellers can not only enjoy such spaces, but can also compost their own organic waste efficiently on their property. Are there current regulations around percentages of garden area per property? If so, such percentages could be retained and implemented for new sites as well.

- Approve and support the new performance standards for permeable surfaces to 'soften' the urban and residential landscape, reduce the need for new infrastructure or infrastructural upgrades, and ensure a greater proportion of green space.
- Strongly support limits to impermeable surfaces. There are examples of recently built residences where the vast majority of the site has been concreted – this is hugely detrimental to stormwater management and to the toxicity of the run-off in the Harbour and other waterways. It compromises the biota of the city and undermines the first stated strategic goal – Dunedin is Environmentally Sustainable and Resilient.

### 3.3.8 Minimum residential unit sizes

Minimum unit sizes are being considered for inclusion in the 2GP to ensure all residential housing provides adequate living areas for occupants.

Four respondents provided feedback.

- Need to ensure there is no accidental and all-encompassing blanket rule regarding unit sizes when the definition of a 'studio' might have a few different forms. Perhaps there could be additional note for Studio Rooms vs. Studio Units (being self-contained). Secondly, the minimum size for a studio unit at 40m<sup>2</sup> is 5m<sup>2</sup> more than Auckland's level. We know 35m<sup>2</sup> works fine and so this should be the minimum if required.
- The existing Residential 3 with an 11m height limit, and bonus for additional car parks, is the preferred approach to managing minimum site size.
- Minimum size for studios and one-bedroom units is probably too large – why have a limit?
- Older housing stock should be updated or replaced, but with habitable room restrictions in place this makes building them very marginal. If this allowance could be decreased to say one in 40m<sup>2</sup> then you may see a lot more property developed.



### 3.3.9 Accessory buildings

The Q&A sheet explained that small accessory buildings may be able to be constructed closer to boundaries, rather than having to comply with boundary setbacks.

One respondent provided feedback supporting the change for accessory buildings.

- Support a change allowing accessory buildings to be built closer to boundaries than currently.

### 3.3.10 Height

The current Plan specifies a 9m maximum height for residential environments. This will remain the same in the 2GP except in City Rise and the Campus where it will increase to 12m due to the topography and existing taller buildings.

Four respondents made comments about the proposed maximum height limits, primarily relating to sites in City Rise.

- Any new buildings or alterations within the Stuart Street heritage triangle should fit with neighbouring properties. If an owner wishes to alter, demolish or replace a small house in between two three storey houses, then it would be sensible to allow a maximum height of 12m. However, if the house in question has single storey neighbours, then to build or alter to 12m would seriously impact on the sun, privacy and view of several neighbours.
- 12m maximum height limits may be too hard to achieve on many existing sites as these are too narrow when applying the height plane recession angles.
- Increasing height will encourage more units to be built, or building on a smaller footprint.
- Do not agree with the goal for managing residential activity due to proposed height changes. Don't increase from 9m to 12m in City Rise neighbourhood – land is not stable enough to sustain buildings of 12m building height (ie medium density).
- View not taken into consideration, but view plays a massive part in re-sale of property. 9m is acceptable, but 12m would lose the view of the city and some of the Harbour.

### 3.3.11 Height in relation to boundaries

The preferred approach is to use a similar approach to Christchurch to allow consideration of residential site aspect. The Q&A sheet explained that the angle would differ depending on the orientation of site boundaries and would start 2.5m above ground.

Two respondents provided feedback opposing of the preferred options:

- Applying Christchurch's height plane to Dunedin at the present angles would cause the following problems:
  - It will push the buildings to the north side of the boundary causing a lopsided look to the site and will diminish options to give a northerly aspect to living space.
  - In Christchurch, this is applied to flat land, but in Dunedin it will be applied in hilly situations as well.
  - Increasing the maximum height to 12m will have little effect due to Dunedin's narrow sites and the proposed height planes means that on a 10m wide site, the maximum height you can build without going through the height planes is 7m.
- A better solution would be to have no height planes on the front half of the site or to the extent of buildings on either side, and have the proposed height planes applied to the remaining side and rear boundaries of the site.
- The 2.5m high start recession plane point is too onerous and may be too low to the practice – NZS3604 require a building clearance of about 2.8-2.9m including some height for various roof constructions – this pushes the owner's building towards the north boundary where you require the outdoor living space. Bad combination?



### 3.3.12 Removal of resource consent triggers

The Q&A sheet highlighted changes being considered for the 2GP to remove the need for resource consent in situations where existing buildings do not meet performance standards.

One respondent provided feedback supporting the removal of resource consent triggers in the Residential Zone but suggested that the DCC consider how existing use rights are maintained, stating that it seems unfair that these rights are lost immediately after demolition, and that it would be fairer if they last for up to five years just as consents do.

- The removal of some resource consent triggers makes sense – eg existing yard setback to match existing buildings etc.

### 3.3.13 Privacy

To manage privacy between multi-unit developments, the 2GP proposes approaches of performance standards (eg requiring certain distance between windows of living space, or not allowing windows to face each other), or encouraging good design outcomes through assessment matters to allow for greater flexibility.

One respondent commented on privacy for multi-unit developments in the Residential Zone, stating that 'fencing appropriately' was the approach they preferred for managing privacy.

### 3.3.14 Visitor parking

Depending on the approach to parking requirements, additional provisions for visitor parking may be required for multi-unit developments. The Q&A sheet suggested a calculation based on the number of habitable rooms within the multi-unit – eg 0.2 visitor car parking spaces per three habitable rooms.

One respondent provided feedback highlighting issues with the performance standards around visitor parking:

- The new rules are more onerous than the present rules – especially for multi-unit developments where visitor car parking has to be provided. This would be hard to achieve on small, narrow sites. In the present Residential 3 Zone, one car park is required for each household unit up to four habitable rooms. Under the proposed rules, as well as one car park per household unit, developers will have to supply 0.2 of a car park (rounded up to the nearest whole number). Presently a number of two unit developments happen on a 10m wide, 228m<sup>2</sup> site – where is the third visitor car park going to fit without dominating the front of the site with car parking?

### 3.3.15 Other residential performance standards feedback

Six respondents suggested amendments to performance standards for residential activity that did not fit in the above categories. Comments largely related to landscaping and amenities and the location and design of residential development.

#### ***Landscaping and amenities***

- The onus of organic waste disposal from multi-unit developments has been put on householders, but it needs to be explicitly stated that there will be space and provision for composting by all dwellers on a property, that is, an expectation that residents will compost their organic waste on site. To do this, there needs to be an area of natural cover.
- Amenities (drainage, rubbish, car parking, state of footpaths, etc.) currently are not enough to sustain population of area as it is [in City Rise].
- Outdoor living, site coverage/permeable surface, maximum heights, car-parking and setbacks, etc., will all be hard to achieve – in combination, these will be near impossible to achieve.
- Consideration of streetscape must include control of excavation and earthworks on street edges as poorly finished excavation reduces the character of the area.
- The Dunedin Amenities Society would like to see defined standards set in place that relate to:
  - Landscape and amenity value; and
  - Greater performance values attached to mitigating or creating value to urban biodiversity.

#### ***Existing buildings***

- There appears to be a bias for greenfield situations, but the majority of work will relate to brownfield situations – consider making a distinction as the rules will be harder to apply/comply with existing sites/buildings.

#### ***Incentives through activity status***

- To encourage 'better design outcomes' – especially for multi/higher density projects, there should be incentives provided through 'activity' status/hierarchy status - eg Permitted Activity status vs. Discretionary Activity for professionally designed projects vs. non-professionally designed. After all, a lot of good design should already be incorporated into the 'designed' option.

### 3.4 Future Urban Development Zones

To provide for Dunedin's future development needs, sufficient land is required in appropriate areas. The Future Urban Development Zones (FUDZ) Q&A sheet explained that greenfield land suitable for urban expansion will be analysed based on guidance from the Spatial Plan in areas close to existing urban development and infrastructure, and avoiding hazards, productive land and outstanding landscapes.

Five responses were received on FUDZ, mostly supporting the approach in principal, but all expressing concerns or suggesting alternatives to the location of FUDZ, potential effects from FUDZ, and inclusion of the public.

#### **Location of Future Urban Development Zones**

- Concerned about triggers and green spaces – for example, if Mosgiel (in the catchment scenario) were to be seen to have reached capacity, would subdivision on productive land then be permitted? This could work to increase urban or semi-rural sprawl – the catchment idea has serious flaws.
- Free up urban development to satisfy the Spatial Plan's vision – areas close to existing infrastructure, free of hazards, not on high grade soils and not affecting biodiversity.

#### **Potential effects of Future Urban Development Zones**

- The Dunedin Amenities Society would like more information on the effect of FUDZ on:
  - Biodiversity and landscape connectivity;
  - Pressure on available ecological and recreational space; and
  - The visual amenity of such zones.
- While the release of land based on its underlying productive capacity may be a relevant factor to consider, it is not the DCC's role to make decisions based on a narrow measure of productive capacity, given the potential impacts on private landowners (eg FUDZ designations altering land values, and issues for land-owners subdividing for retirement or succession planning). Therefore, while supportive in principle, Federated Farmers would like to see more detail on how the FUDZ will be identified and provided for.
- Why does Dunedin need to stay a compact city?
- Disagree with plan to keep section prices up; lower prices will help affordable housing.
- Why worry about ad-hoc development or urban sprawl when guided by the Spatial Plan?

#### **Public input and consultation**

- Let the Dunedin people decide where they want to live. This would save the DCC doing "robust analysis and evaluation of potential areas".
- The Ministry of Education notes that there is no planned consultation prior to notifying the Plan and would be interested in providing feedback on the proposed FUDZ in relation to existing school networks and the capacity to accommodate future growth.
- Disagree with no FUDZ analysis consultation, or the DCC land banking with trigger prices.

- Agree that sufficient land in appropriate locations is needed for Dunedin's future housing.
- Safeguards from inappropriate development are essential. A focus on the regeneration of existing urban areas is supported – makes no sense to create more infrastructure and build on arable/undeveloped land, if what already exists services people's needs.
- The Ministry of Education supports the approach being proposed.
- Support the proposal to develop FUDZ. The idea that triggers will be required before land is released for development ensures that in-fill of the current urban areas is considered first and foremost. Federated Farmers agrees this is an appropriate way of meeting the concerns outlined in the Spatial Plan, and reducing the loss of productive land.

### 3.5 Commercial Zones

Well designed and managed commercial environments are critical for an economically prosperous city. This is recognised in the proposed Strategic Directions for the 2GP.

The Commercial Zones Q&A sheet set out the goal of protecting land that is important for sustainable economic prosperity from less productive competing or incompatible uses. To achieve this, it is proposed that the 2GP will have stronger strategic policies that support rules related to retail activities distribution and 'out-of-zone' development. This will be supported by a finer-grained set of zones, objectives, policies and rules to clarify how the distribution of retail and other commercial activities should be managed.

Table 6 below shows the number of respondents who provided feedback for Commercial Zone topics.

**Table 6 - Number of respondents providing feedback on Commercial Zones**

Commercial Zones topic	Number of respondents
Proposed changes and goals	1
Central City	2
Centres	8
Trade-Related Home Improvement Zone	3
Retail	3

A number of additional sub-topics were also addressed in the Q&A sheet but received no responses. These included:

- Making it easier for light industry to locate in the city
- Offices
- Parking buildings and commercial

#### 3.5.1 Proposed changes and goals

One respondent provided feedback on the proposed changes and goals for Commercial Zones, and while supportive, provided comments related to enhancing the central city.

- Most important that the city centre is a place where shade is naturally provided where possible and appropriate – for example, deciduous trees in pedestrian precincts and along streets and where there are many areas of plantings.
  - CBD, inner retail – support the high quality pedestrian environment and DCC investment in streetscape. Dunedin needs to move rapidly to closing particular streets to through-traffic. In particular, the Lower Octagon, the adjacent block of Lower Stuart Street and some George Street blocks immediately north of the Octagon to the New Edinburgh Way.
- Agree with most of the goals in this section, especially those supporting the economic re-use of heritage buildings, and the better management of demolition sites.
  - Applaud all moves to manage on-street parking of vehicles, especially off the main CBD blocks, and applaud all moves to encourage more cycling and walking within, and into, the city.

### 3.5.2 Central City Commercial Zones

The Q&A sheet identified the Central City Zones which include four area-based zones making up the Central Business District (Inner Retail, Tourist Entertainment, Business and the Warehouse Precinct), and six discrete area-based zones comprising the Central City Edge (these zones include the Harbourside, Cumberland and MacLaggan Streets, Harrow and Lower Princes Streets, and Smith Street).

One respondent thought that the Central City Zone(s) may be too finely grained and questioned whether there was enough justification for so many areas, postulating that five may be enough to reflect the existing patterns while still providing a mix of activities.

- Supportive of the DCC's activity in regard to the Warehouse Precinct, and also support the development of the Queen's Gardens through to the Octagon that will see the vehicle experience give way to the enhanced pedestrian experience.

#### **Central City – City Edge**

One respondent provided feedback on the Smith Street Zone. The respondent was not in opposition to the role and management goals of the proposed zone, but was interested in how the goals would be achieved and raised concerns regarding commercial and residential activities in the Smith Street Zone.

- Concerns around the nature, scale and hours of operation of commercial activities, and also the effect on the rates of the existing residential properties.
- The height of buildings and proposed yard requirements could potentially affect residential amenity (a number of existing buildings are built near their southern boundary. Under the proposed recession plane rules, a new building could be erected close to the northern boundary of the adjacent southern lot).

### 3.5.3 Centres

Six zones are identified in the centres hierarchy. The zones proposed are Principal Centres, Suburban Centres, Neighbourhood Centres, Neighbourhood Convenience Centres, Neighbourhood Destination Centres and Rural Centres.

Eight respondents provided feedback on the Centres Zone Group. This feedback included comments on Principal Centres, Suburban Centres, Neighbourhood Centres, Rural Centres, and some general comments relating to all centres.

#### **Principal Centres**

- The Plan needs to:
  - Acknowledge that higher density housing around Mosgiel's Centre will compromise potential growth and development of the commercial zone/retail centre; therefore provisions should be made now to allow for expansion.
  - Remove residential zoning in parts of the town centre (consider transitional zoning for current residential properties) eg Church Street between Cargill Street and Factory Road, and possibly Irvine Street car park to Gordon Road to be rezoned commercial.
  - Acknowledge that the population of Mosgiel continues to grow and with this so will its retail requirements.
  - Acknowledge Mosgiel is becoming a 'destination' for non-Mosgiel residents (eg recent snapshot survey indicated children using playgrounds are predominantly from outside Mosgiel).
  - Allow for bigger shop sizes to be built to encourage retail development – current shop sizes are too small for most contemporary retailers.

- Consider at least one other commercial/retail 'pocket' for the Mosgiel Principal Centre – perhaps zoned down Factory Road, (north just beyond Hagart-Alexander Drive) as this is the direction of future residential growth.

### **Suburban Centres**

- Endorse the changes in the Spatial Plan and 2GP for the Roslyn Fire Station to be included in the Roslyn Suburban Centre – it makes perfect sense as there are large vacant spaces within the building that cannot be used for residential purposes (basement etc.) and even the apartments at the far right end would surely be more suitably used as offices. As it stands, however, there is a current requirement for a notified resource consent process to get any commercial activity on site, a horrendously and very time consuming process which would never be undertaken again. Owners of the building fully support the proposed changes – it makes perfect sense for this beautiful building to be able to house business activity.
- The 2GP appears to be somewhat diluted in its ability to enforce the control of retail to the CBD, and diminishes its power to maintain the vibrancy of the CBD owing to the creation of a completely new Suburban Centre around Howe Street, Great King Street and Cumberland Street for which all categories of retail, except yard-based retail, will be permitted.

### **Neighbourhood Centres**

- Agree with the DCC's observation that the traffic layout in the Maori Hill Neighbourhood Centre could be better, and pedestrian crossing points are limited. At present, a major limiting factor on the area being used more is a lack of parking in the area.

- Generally supportive of the proposed Neighbourhood Centre in Maori Hill, and the issues and options identified.
- Pleased to see that the DCC has identified an opportunity to enhance the Maori Hill Centre and its amenity by redeveloping the traffic layout (and other measures too) – this has very good potential but needs to ensure that parking is enhanced too.

### **Rural Centres**

- It would be a very good idea for a hub to be established at the Waitati Rural Centre, but also beautification, with grassy areas and plantings. The current privately owned rural property next to the railway line should be developed as a landscaped area. The Taieri Gorge Railway brings three trips of cruise ship passengers to Waitati every cruise ship day and presently the outlook is dismal with no station/platform or plantings. This should be kept in mind when developing the hub.
- Would like an extension to the Waitati Rural Centre. The Centre as currently proposed is too limited. It is also noted that allowance for the realignment of the State Highway and, more importantly, the appropriate use of the surplus land needs to be accommodated within the new District Plan.

### **General centres comments**

- Emphasis is placed on Dunedin having one City Centre. Agree that there is only CBD, but other 'walkable' community centres exist also (as identified) and could be enhanced further through surrounding higher density zones (transition?), live/work type living and more intensity encouraged through little concentrated areas – this will give identity and differentiation from the surrounding residential character zones.
- The term 'Discretionary' is used prevalently regarding permissible retail activity within the Andersons Bay Road Zone, Lower Crawford Street Zone, Rural Centres, Neighbourhood Centres and Suburban Centres. The term 'Discretionary' appears somewhat ambiguous and does not foster a stronger policy to deter the detrimental effect on the character of

Dunedin and the vibrancy of the City Centre. Rather than 'Discretionary', retail development that does not align with the District Plan should be deemed a Non-complying Activity, thus giving the DCC greater powers in fostering the prosperity of the city.

- Maybe centres should be allowed to include commercial activities on both sides of the street, not just one, so you feel you are passing through a centre/community, not just around. Increased building height will also add to the sense of 'place' and the activity could be supported with better/higher density requirements. Better support for locals as well.
- *"Residential activity also provided for in the upper floors of buildings in larger centres"* – are there regulations around providing dedicated space for residential units/apartments to manage their household waste in a manner that fits with current DCC goals of being environmentally sustainable and resilient? Are there, for example, basement spaces for inorganic recycling separated according to the current collection, and outside areas of natural cover where dwellers are able to compost and use (small gardens) organic waste?

### 3.5.4 Trade Related Home Improvement Zone

The Trade Related Home Improvement Zone includes two area-based zones: Lower Crawford and Andersons Bay Road. These zones provide for a limited range of commercial activities that show they genuinely cannot locate in an existing centre, or integrated extension to a centre, and have minimal ability to add to the social and economic success of centres.

Three respondents provided feedback on the Andersons Bay Trade Related Home Improvement Zone, both suggesting amendments to the current proposal.

- The reference to an exception for *"high trip generators"* should be removed as this is too highly ambiguous.
- It is important to restrict any residential accommodation in this zone, particularly apartments above home improvement or retail stores which could lead to reverse sensitivity issues from the occupiers around the industrial activities neighbouring them.
- As it is not the intention of the DCC to stop current industrial activities that occur within this proposed zone, it is suggested that the title of the zone is misleading and that it be renamed so that it continues to refer to the industrial nature of the area. For example, 'Industrial and Trade Related/Home Improvement Retail Zone' would be more appropriate.
- Large Scale Retail:
  - Baby City seems not to be included in the maps as large scale retail.
  - Concerned with large scale retail and how it has been rezoned.
  - Concerned that the rezoning of large scale retail areas are not being communicated properly or clearly to the public.

- Rockgas agrees with the goals for managing commercial environments so long as Rockgas can continue to operate its branch as it does currently without any need for further compliance, and that the zoning provides for minor alterations to Rockgas' activities.

### 3.5.5 Activities provided for in Commercial Zones

Retail and employment activities are the primary activities expected in all Commercial Zones, with residential activity also provided for in the upper floors of buildings in larger centres. The distribution of these activities will be managed within the Centres and Commercial Zones so the community is supported with goods, services and employment opportunities appropriate to the centre's size and catchment.

Although the Q&A sheet covered retail, light industry, offices, parking buildings/areas, demolition of buildings and restaurants/cafés, feedback on activities in Commercial Zones addressed only retail.

### 3.5.6 Retail

The current Plan manages retail by both the scale of retail activity and the type of goods sold. The preferred approach for retail in 2GP is to continue to use both the type of goods sold and scale, but at a finer level to recognise and provide for built form qualities in different commercial areas.

Three respondents provided feedback on retail activities in the Commercial Zones. Comments suggested alterations to the current rules to protect the wellbeing of the public, and some recommended definition amendments.

#### **Health and safety**

- Concerned that the needs of shoppers who walk or cycle have not been considered well enough in the current Plan, not only on their way to the shop (eg safe cycling/walking, linking retail outlets more safely), but on car parks too (eg South Dunedin Pak n' Save/Warehouse area). Need to consider making safe play spaces available for children who accompany parents – one option could be to demand retail shops build safely connected and fenced playgrounds or small parks.
- There is an increasing trend to combine petrol stations with small shops or food outlets. Although only retail spaces attached to garages require resource consent under the District Plan, there should be an 'assessment matter' to ensure safety for shoppers in both amenities.
- To improve food security, the Southern District Health Board advocates for local access to affordable, fresh food items and supports policy that enables local centres to provide this type of food retail. Large scale food retailers need to be located in areas accessible by both private and public transport. Action to control the density of takeaway outlets, especially near vulnerable communities (eg high schools and low socio-economic groups), is also needed.

#### **Definition**

- Totalisator Agency Board (TAB) should be specifically listed within the definition of an activity – analysis of the draft provisions of the 2GP concludes that TABs more easily rest within the definition of retail. The revised definition of retail will include services such as customer banking facilities, real estate and travel agents – all similar in their operation characteristics to that of a modern TAB.
- It would be helpful to users of the Plan if the definition of 'Licensed Premises' is reworded to include a list of activities/facilities which are commonly part of their operation.



### 3.5.7 Other Commercial Zone feedback

Two respondents provided general feedback that related to all Commercial Zones. Comments addressed improving public wellbeing in commercial spaces.

- Support policy that promotes pedestrianisation in all Commercial/Retail Zones.
- Do not support planning policy that promotes alcohol consumption by default – pleased that the 2GP makes no reference to the word 'bar' and instead uses the words café and restaurant. Advocate that a strategic approach to inform the future Licensing Committee's decisions would enable the new Sale and Supply of Alcohol Act to be enacted to its greatest potential.
- Would be interested in planning controls that could be applied to restrict brothels, gambling venues and venues approved for the sale of psychoactive substances.
- Wondering if there are any planning controls that could be applied that limit tobacco use by default.
- The Dunedin Amenities Society has concerns over the use of commercial space in relation to:
  - Landscape and visual effects;
  - The use, development and retention of passive or active recreation amenity space that links commercial activity with the character of the city;
  - The provision of open space to provide reflective, contemplative and useable open space or areas that adds value to the Commercial Zone;
  - The use of urban design standards that allow for the development of areas of amenity space for an improved landscape/streetscape aesthetic including the use of trees and amenity features; and
  - The retention of heritage character of buildings, streetscapes and other historical and cultural features of this zone.

## 3.6 Commercial Activity – Performance Standards

The key goals for managing the design of buildings in commercial environments are to contribute towards attractive centres and commercial areas, and to manage the public-private interface to support a high level of pedestrian amenity and accessibility in centres.

Table 7 shows the number of responses received on topics related to performance standards for Commercial Activity.

**Table 7 - Number of responses received for Commercial Activity Performance Standards**

Commercial Activity – Performance Standards topic	Number of respondents
Active edges	3
Building height	5
Parking requirements	3
Signs	1
Site coverage	1

### 3.6.1 Active edges

The Q&A sheet described the preferred approach for the 2GP as extending the active edge performance standards across other parts of the central city and most centres, as opposed to the current Plan which only addresses some parts of the Central Activity Zone. These performance standards would be grouped into two types of street frontage typologies, a collection of standards to manage the overall built form created by buildings. Type 1 would be applied to the retail core resulting in buildings built to the street frontage with a high level of glazing and parking placed behind the building if provided, while Type 2 would be applied to the edges of the retail core, resulting in buildings built to the street frontage with a lower percentage of glazing and landscaping along the street frontage where there are parking areas or no buildings.

Three respondents provided feedback on active edges, all suggesting amendments to the preferred option.

- Do not believe that minimum parking requirements are necessary for Type 2 performance standards. Support the stating of maximum parking for commercial activities to be covered in the Plan – that 'maximum' needs to be as compact and discreet as possible. Many of the parks on Crawford Street near the Chinese Gardens are often empty.
- Suggest that the requirement for verandahs be removed from the South Dunedin Precinct.
  - Building verandahs are characteristic of Dunedin's buildings and form an important part of the Central City Zone townscape, but the early buildings of South Dunedin did not have verandahs.
  - Omitting the requirements for verandahs would allow for the development of a new character, although developers may still choose to include verandahs.
- Active edge requirements appear to be too onerous – especially when a Commercial Zone abuts a Residential Zone, ie commercial standards are watered down to provide some 'transition' but a solid contrast is more 'alive' and dramatic.

### 3.6.2 Building height

The Q&A sheet explained that the preferred approach to building height for Principal Centres (except South Dunedin), Suburban Centres and North Dunedin is to allow an increased maximum height. An increase in height from the current 11m maximum is also being considered for some parts of the Central City Zone Group, but is yet to be determined.

Five respondents provided feedback. Some made supporting comments, but the majority were in favour of amendments to either the location or standards of the proposed heights.

#### ***Centres building height***

- Extra allowed heights are good (where possible, to be achieved independently of other requirements), but limit these height locations to city centres/neighbourhood hubs, not along main transport corridors as suggested – you don't clutter up passageways in your house.
  - The proposed activity changes within the Commercial Zone seem out of place with the nature of the surrounding area. The 9m height rule in largely Rural Centres, for example, changes the character of these areas unnecessarily.
  - Would like to see a 12m maximum height in the South Dunedin precinct to be aligned with other precincts in the city.
    - South Dunedin is the secondary commercial hub, thus more dense development needs to be encouraged to bring more office and service accommodation into the precinct.
    - Cannot see the logic in having a 9m maximum in South Dunedin when other suburban areas are allowing 12m – there are no special vistas or views needing preserved as could be argued for some other areas, eg St Clair.
    - Because of the north-eastern orientation of the street shading, issues would be minimised with the increased height.
    - The land to the northeast of Rankeilor Street is zoned industrial and currently has no height restriction (but this may change with the new plan).
    - Most existing two storied buildings northeast of King Edward Street are higher than 9m.
    - Modern sustainable construction generally requires addition depth or volume for insulation and air movement, thus additional height is required.
  - Implement a building height limit regardless of building type or function across all zoning. The most valuable asset Dunedin has is its views, a non-renewable resource. Currently, there are loopholes in the District Plan and the 2GP does not do enough to close them. The message must be loud and clear – no abnormally high structures in the prime city area. The current highest building is 13 stories – that is the limit developers must be clear on. The building height maximum may be exceeded by one storey only on an individual basis – ie a 23 storey building built in Dunedin would have to have had at least nine buildings preceding it, and in the same general area as those higher than the current 13 storey record (heritage type architecture notwithstanding).
- Higher density and/or heights around the cities various sub-centres will give strength to these centres, giving them extra vitality and help provide identity for the communities they support.

### **Central City building height**

- The old 9-11m min/max height limits was foolish (and incorrect). The intention of these limits was not to be used throughout the CBD, but only to help preserve the main street corridor heights. Many buildings throughout the zone exceed this so there is no need to be so restrictive – encourage intensity but limit it to already mentioned areas.
- Would like the city to recognise the spiritual role that First Church has in the foundation of Dunedin and ensure that no structure, other than those associated with industrial activities (eg silos and pylons), is ever allowed to be taller than the upper gables.

### **3.6.3 Parking requirements**

In relation to activity-specific car parking requirements in Commercial Zones, the preferred option for the 2GP is to review standards in light of current research and best practice, with a preference towards reducing minimum parking requirements where this can be achieved with little adverse effect.

Three respondents provided feedback on commercial parking requirements, all raising issues with the current situation.

- Crawford Street and parts of Andersons Bay Road are fast becoming the new, de facto, Dunedin main street. This is encouraged by the availability of free parking. By their very nature, these locations are private vehicle-orientated, which is not quite what the Transportation Strategy has in mind. George Street has become home to a plethora of cafes, AUS/NZ clothing and jewellery chains, optometrists, phone shops, etc. and north of the Octagon are but three shop front premises with a predominantly local content. The change from limited time and free to expensive on-street parking in the CBD was a retrograde step as far as retaining business and attracting people to use the George and Stuart Street retail areas. Dunedin is only large enough for a given number of viable retail businesses and the relocations to the south are rapidly making a bad situation worse.
- There should be a car parking provision provided with new developments.
  - Street car parking is at a premium in South Dunedin. Recent work on street improvements and the loss of some car parks has added to this problem.
  - This requirement is not entirely straightforward as the size of many of the lots is not conducive to provide economical car parking layouts.
  - Provision of car parking could help define a logical amount of site coverage.

### **3.6.4 Signs**

One respondent provided feedback on commercial signage, suggesting that there should be pedestrian signage/connections to Careys Bay Hotel.

### **3.6.5 Site coverage**

The Q&A sheet did not address site coverage, but one respondent provided suggestions for site coverage performance standards in South Dunedin.

- Would like 100% site coverage allowed in South Dunedin to be aligned with the CBD.
  - The currently allowable 70% site coverage does not seem to have a logical basis and does not allow for efficient use of the land.
  - Many of the lots are narrow and do not allow efficient car parking layouts.
  - The effects of allowing full site coverage could be mitigated by requiring new developments to provide some form of car parking, to give a logical basis.
  - There are no yard requirements for the adjoining industrial land.
  - A high percentage of the existing buildings currently have 100% site coverage.
  - No benefit or need to have landscaped areas adjoining the Industrial Zones.

## 3.7 Rural Zones and Landscape Overlay

Dunedin's rural environment is essential to the city's environmental, social and economic wellbeing based on its:

- economically productive activities such as farming and forestry;
- ecosystem services such as biodiversity and water catchments; and
- significant landscapes which have important social and cultural values, as well as economic benefits generated through tourism.

The Rural Zones and Landscape Overlay Q&A sheet highlighted goals for protecting important land, maintaining or enhancing Dunedin's coastal environment, outstanding landscapes and areas of indigenous biodiversity and ensuring public infrastructure is used as efficiently as possible. These goals are to be achieved through a review of the Rural Zone and Landscape Overlay Zones and a move to a finer grained zoning approach.

Table 8 below shows the number of responses received for the range of topics relating to Rural Zones and Landscape Overlays.

**Table 8 - Number of responses received for Rural Zones and Landscape Overlays**

Rural Zones and Landscape Overlay topic	Number of respondents
Proposed changes and goals	5
Review of Rural Zone	1
Hill Slopes Zone	2
Coastal Zone	2
Hill Country Zone	1
Peninsula Zone	6
Review of Landscape Overlay Zones	9
Review of provisions related to landscape	2
Review of approach to managing tourism	1
Review of provisions related to rural industry	4
Review of provisions related to forestry	3

### 3.7.1 Proposed changes and goals

Five respondents provided feedback on the proposed changes and goals for the Rural Zone, mostly in support, with one comment suggesting an addition to the wording of a goal and another wanting more emphasis on local food supply.

- Support the goals for managing the built environment, with some additions – the first goal should read "economically productive activities such as farming, forestry *and renewable energy generation*."

- The proposed Strategic Directions for the 2GP include the following objectives: *Land that is important for sustainable economic prosperity, including parts of the Central Business District, industrial areas, key transportation routes and gateways, and the most productive rural land, is protected from less productive competing uses or incompatible uses.....*” Realising this objective is necessary for local food supply. Economic prosperity in the Rural Zones has competing activities. Ensuring ‘sustainable economic prosperity’ and that ‘Dunedin is Environmentally Sustainable and Resilient’ will be competing strategies. Core principles for decision-making would provide direction. Given Objective 2, Policy 1 under Strategic Directions (ie *identify areas important for food production and protect them from land fragmentation via subdivision or residential-oriented development which may diminish food production capacity.....*), Rural Zones should be reviewed so as to enable achieving this objective.

- Generally agree with Q&A goals.
- Support proposed changes in the Rural Zone.

### 3.7.2 Review of Rural Zone

It is proposed to replace the current single Rural Zone with seven zones to enable 2GP provisions to focus on issues specific to different parts of Dunedin’s rural environment.

One respondent commented on the proposed Rural Zones, cautioning that the approach could promote rural land fragmentation.

- The ‘finer grained’ approach to the Rural Zone (distinguishing the wide range of characteristics within the current undifferentiated Rural Zone) makes sense, but there is a danger that it will lead to further fragmentation of rural land in the those areas closest to major settlements, particularly Dunedin.

- Purakaunui Environmental Group concurs with the objectives as stated and believes the review of the rural sector into seven distinct zones is a positive approach, recognising the different characteristics of each zone.
- Recognising the different rural areas is way overdue - it's about time!

### 3.7.3 Hill Slopes Zone

The Hill Slopes Zone includes the slopes forming the northern backdrop to the main urban area of Dunedin, the hillsides on both sides of the upper Otago Harbour, and the north and eastern hill slopes above the Taieri Plains.

Two respondents provided feedback on the Hill Slopes Zone, both commenting that no alterations should be made to the existing boundaries and function of the zone.

- In relation to the North-West Peninsula area, particularly that surrounding Macandrew Bay, and the suggestion that in areas such as this there is pressure for the conversion of small farms into lifestyle developments. Capitulation to this pressure would be contrary to the proposed Strategic Directions for the 2GP, particularly that “the natural character of Dunedin’s outstanding and significant landscapes is maintained” and the urban form strategic objective to “have a compact city with resilient townships”. Under the current District Plan, the higher rural land in the North-West Peninsula area is designated as a Landscape Conservation Area and its visual importance to the wider city is described. The important role of this landscape should continue to be recognised in the review of the Landscape Overlay Zones.
- Oppose any reduction in the size of the landscape zone which includes Mt. Cargill.

### 3.7.4 Coastal Zone

The Coastal Zone comprises the South Coast hills, the western flanks of the lower Otago Harbour, and the North Coast from Heyward Point to Waikouaiti. It provides the backdrop to the coast in these areas, extending to include the hill slopes east of the Taieri Plains and the immediate hinterland of Blueskin Bay and the Waikouaiti area.

Two respondents provided feedback on the Coastal Zone, both expressing concerns.

- The lack of protection offered through the preliminary material is of significant concern to the Waikouaiti Coast Community Board. The areas identified as coastal landscape may well, in some locations, be far too narrow. Concern regarding the minimal extent of protection for the Mopanui and Heyward Point ridgelines and why this zone finishes at the outlet of Hawksbury Lagoon and does not extend further north.
- Concerned by the lack of any skyline protection effectively from Puketeraki through to Warrington and around Blueskin Bay – the skylines within the area contribute to the special character of the Coastal Zone.
- The change of name from the North Coast Landscape Preservation Area to a Coastal Landscape Zone is of concern to Blueskin Baywatch – the loss of the word ‘preservation’ signals a reduction in the level of protection given to the area.
- The huge reduction in the size of the overlay zone to a very small coastal margin in some places will not help achieve the aim of “maintaining or enhancing the natural character of Dunedin’s coastal environment.” Pleased to see that there is now the inclusion of some land, albeit equally thin, surrounding the Blueskin Bay Estuary.
- Restricted Discretionary activity status will not provide strong enough control over residential and other development in the sensitive coastal area. Outstanding Natural Landscape protection has been given to the Otago Peninsula, but both from a landscape perspective, and as habitat for important biodiversity, the coast northward from Aramoana to Karitane is equally as impressive.

- The Waikouaiti Coast Community Board are supportive of Council’s intent on providing additional protection for our coastline.

### 3.7.5 Peninsula Coast Zone

The Peninsula Coast Zone is a biodiversity hotspot comprising the coastal side of the Otago Peninsula and the eastern side of the lower Otago Harbour.

Six respondents provided feedback on the Peninsula Coast Zone, largely in opposition to any changes and desiring a stricter approach to residential developments as well as policy in general.

#### **Fragmentation and residential development**

- Agree that fragmentation has negative effects on rural character – once the fabric of the rural environment is lost, it cannot be turned back. Decisions have been ‘only one more house’, but the cumulative effect means the Otago Peninsula will have lost the wildlife and therefore wildlife tourism.
- Lack of public notification of resource consents and building consents in rural areas on the Otago Peninsula has been one of the main reasons that have led to problems arising later from inappropriate land use and dissatisfaction/irritation with the siting and visibility of dwellings. Save The Otago Peninsula would like to see such activities requiring permission and able to be scrutinised at the consent point.
- Concerned that we will see rules that would suddenly allow massive urbanisation of the Otago Peninsula due to the large number of smaller sections already in place.

- Lifestyle subdivisions benefit one person to the long term detriment of the community – issue with the DCC succumbing to pressure from consultants, lawyers etc. to allow flexibility, ie letting inappropriate development happen.
- The coastal areas of Dunedin need to remain unblemished. Ocean Grove is alive with rural activities – any added housing would ruin the aesthetic of this 'Outstanding Landscape' for others in Dunedin who look toward this area. The area is also popular with walkers and cyclists – the roads do not need to be any busier with cars than they are as it will add to the dangers of this enjoyable past-time.
- Do not want the Peninsula to look like the Gold Coast. Dunedin needs to build up and not out and protect Dunedin's uncluttered coastlines from urban sprawl at all costs.
- The 2GP should not allow Residential Zones to encroach on rural land. Sensitive coastal land, particularly, needs greater protection from urban development.
- Not in favour of rezoning Centre Road from rural to residential – this is an area that consists mainly of farming activities and would not combine well with residential. The area is also extremely windy and would not be good for growth in residential properties. The windswept landscape is a tourist attraction and would be spoilt by the building of houses should a new subdivision be allowed.
- Harbour Cone: too much land – subdivide south of Portobello Road and get rid of DCC not farmers – sell off as farmland.

### ***Overarching concepts***

- Need to keep the big picture and the long term view in mind. The mechanisms should reflect this, as should decisions and following up of conditions.
- Need recognition of the Otago Peninsula's special character and nature in the new Plan.
- The 2GP does not emphasise strongly enough the importance of Dunedin's coastline. Save The Otago Peninsula would like to see more stringent guideline rules imposed on decision makers. Instead of them 'having regard to', they should instead be instructed to 'give preference or priority to' those landscape criteria that are considered important.

- Glad to see tourism recognised.
- Support the DCC's goal to create more housing for residents while inhibiting the break-up of rural land for lifestyle blocks.

### **3.7.6 Hill Country Zone**

This zone incorporates large areas of Dunedin's inland rural hinterland, including the hill and valley systems of the Silverpeaks, Taieri Gorge, Waipori Valley and Waikouaiti Valley.

One respondent commented on the possible boundaries of the zone and guidelines for shelter belts.

- The boundaries of the 'Outstanding Landscape' area should be clearly defined. The northern boundary could be set parallel to and 500m south of Kidds Road, and the southern boundary parallel to the rest area on State Highway 87. South of the rest area, there are trees and buildings and the rocky outcrops become fewer.
- Shelter belts are an important part of farm properties; the protection of stock from the elements is a part of good farming practice and overseas customers require that there are sound animal welfare systems in place and audit properties to see that this is practised. Shelter belts also protect the pastures from adverse weather – Strath Taieri is noted for severe winds. Shelter belts could have guidelines regarding appropriate species.



### 3.7.7 Review of Landscape Overlay Zones

The 2GP will refine the current Plan approach of managing Significant Landscapes through the identification of Landscape Management Areas. Changes will involve better alignment of terminology and approach with the RMA and best practice.

Nine respondents provided feedback on the proposed Landscape Overlay Zones, recommending the inclusion of further areas, the justification behind the zones and activity status within the Coastal Overlay Zone.

#### **Boundaries and zone extent**

- Brighton/Ocean View Coastline, including Lower Scroggs Hill Road, should be classified as an Outstanding Coastal Landscape.
- The 'balance' of zones could be managed better/fairly, ie some large lot residential areas (or rural-residential) within areas available 'close in' that will not put pressure on existing infrastructure and/or services. Limit the extent, as per policy, but show some balance and practicality. Some residential invasion seems to have been allowed in some remote places (already existing?) whereas other more practical areas have been ignored.
- A 'Harbourside and Peninsula' zone is recommended as this area is Dunedin's wildlife and tourism hotspot with obvious connection and continuity between the two areas.
- The lower boundary of the north-west Peninsula Landscape Conservation Area [existing Plan] traces an irregular path above the boundary of Macandrew Bay. At times, the boundaries meet, while at others there is a gap between the two. As the landscape character of the lower slopes looks no different to those of the higher slopes, the lower boundary of the Landscape Conservation Area should be aligned with the boundary of Macandrew Bay as shown on the District Plan map.
- Save The Otago Peninsula would like to see Portobello Peninsula given the outstanding landscape status that it deserves.
- It is unclear how the DCC intends to protect Outstanding Natural Features and Significant Landscapes and Natural Features and what the DCC considers to be the extent/boundary.
- Need recognition of major landscape features as outstanding or significant, eg Mopanui, Mihiwaka, Mapoutahi and Porteous Hill. Also include Orokonui Ecosanctuary as part of a landscape zone and the creation of a buffer zone around it and other areas with important biodiversity such as Blueskin Estuary in order to control development impacts.

#### **Rationale**

- Under the District Plan, large sections of rural land adjacent or highly visible from the coast were part of the North Coast Landscape Preservation Area. The proposed 2GP coastal landscape area appears to be significantly reduced which suggests that much of what was previously protected will be rezoned as rural land. Purakaunui Environmental Group questions the reasoning for the difference in zoning between the Peninsula Coast and the Northern Coast – there are several features in the North Coast that should be given Outstanding Natural Feature or Significant Landscape and Natural Feature status.
- The Waikouaiti Coast Community Board is confused about the rationale for the areas selected, especially considering those areas/features that have been excluded from protection, i.e. in the 'Coastal Zone'.

#### **Activity status**

- All land use activity in the Coastal Overlay Zone has 'Restricted Discretionary' status. This will impede the DCC's ability to consider all matters that may not be covered by the Plan – the status should be 'Discretionary'.

- Approve the proposed Landscape Overlay Zones and value the inclusion of inner Blueskin Bay in the 'Coastal Landscape Zone'. In particular, Blueskin Resilient Communities Trust congratulates the DCC on an excellent rational review of overlay zones that provides serious improvement on the status quo.

### **3.7.8 Review of provisions related to landscape**

The Q&A sheet explained that changes to the Landscape Overlay Zones may affect the management of residential activities in areas of significant and outstanding landscapes.

Two respondents provided feedback on landscapes in the Rural Zone. The first wanted to see well defined landscaping, neutral non-reflective colour, and bulk and height restrictions on any new dwellings (including farm buildings) in the coastal Rural Zone, including sites zoned rural-residential. The second respondent felt that any development in all rural areas (not just significant landscapes) should be made to blend in with the topography and colours.

### **3.7.9 Review of approach to managing tourism**

The Q&A sheet explained that the 2GP will allow tourist activities as a Permitted Activity (subject to performance standards) in the rural environment, as long as they are linked to farm operations or surrounding natural environment.

One respondent provided feedback requesting that in order to assist with the sustainability of Coastal Zone communities, and in the absence of defined town centres, the DCC provide the opportunity for boutique-type business opportunities within these towns. The intended result of this direction is to allow communities to capitalise from, and cater for, tourism opportunities resulting from the development of the coastal scenic route.

### **3.7.10 Review of provisions related to rural industry**

Due to the restrictive nature of the current Non-complying Activity status for industrial activity in the rural environment, it is proposed to change the status of rural industry such as sawmills and agricultural contractors' depots to have a Discretionary Activity status.

Four respondents made comments on rural industry, all wanting different variations on the proposed approach.

- Save The Otago Peninsula would oppose a review of provisions related to rural industry in the zones 'Hill Slopes', 'Coastal' and 'Peninsula Coast' whose landscape features and importance to tourism would be adversely affected – should remain Non-complying.
- Concerned about loosening of any rules relating to, or the inclusion of, additional Permitted Activities of an industrial nature in the Rural Zone. The North Coast area has a mix of villages and small settlements interspersed with farmland. Allowing less restrictive rules around rural-related industry could lead to these businesses being sited closer to residential areas or creating problems, such as increased heavy traffic or pollution issues.
- Our Food Network supports a less restrictive approach to rural industry, especially where this relates to food processing and the like.
- Permitted Activities should be 'listed', not 'Discretionary'. Any unforeseen activities not on the Permitted or Restricted Discretionary list can be accommodated by a plan change.

### **3.7.11 Review of provisions related to forestry**

It is proposed that forestry will remain a Permitted Activity in Rural Zones, with any new forestry requiring resource consent in Landscape Overlay Zones.

Three respondents provided feedback on forestry in the Rural Zone, all suggesting changes to the section.

- Further consideration needs to be given to clear guidelines and rules about what forestry can occur and where. Also need defined obligations with regard to reinstatement post harvesting.

- Standard plantation forestry should be a Prohibited Activity in all Landscape Overlay areas. Sustainable stewardship forestry should be encouraged, but would need to be a Discretionary Activity so that a forest management plan could be approved.
- Issues of erosion if all trees are harvested at once, which of course is the economical way to do it. The clause about forestry should have a reference about taking into account the Emissions Trading Scheme regulations and restrictions. Mostly they require replanting unless the area is exempted.

### **3.7.12 Other Rural Zone feedback**

Four respondents made comments on the Rural Zone that did not fall directly under one of the above sub-topics. These comments reflect a demand for additional or amended rules, policies and definitions in the Rural Zone.

- Enable the use of composting toilets – do rules in the current District Plan control/hinder these?
- Diverting grey water from septic tank, and separating black from grey waste – investigate any ways in which the 2GP could facilitate this.
- The Dunedin Amenities Society would like better definition of the many significant areas of outstanding or high value landscape around Dunedin, and higher standards for any proposed development in terms of the effects that proposed development may have on:
  - ecological connectivity;
  - landscape and visual preservation;
  - effects of infrastructural development; and
  - effects on traditional agricultural land use.
- The Outstanding Landscape provisions are in place for the benefit of everyone else, but the landowner is faced with all the extra costs for the benefit and enjoyment of others. Farmers are substantial ratepayers, trying to run an economic business, which in the end provides a much greater return to the local economy. Why should they be faced with the extra cost of resource consents, when others farming outside an Outstanding Landscape Area are not faced with these costs?

### 3.8 Rural Zones and Landscape Overlay – Changes to the Management of Residential Activity

The goal for managing residential activity in the Rural Zone is to protect land that is important for sustainable economic prosperity from less productive or competing uses. Proposed changes to ensure this include a review of minimum site size, undersized sites, and provisions related to landscapes and high class soils.

Table 9 below shows the breakdown of responses received in relation to changes to the management of residential activity in Rural Zones and Landscape Overlays.

**Table 9 - Number of responses received on Residential Activity in the Rural Zone**

Residential Activity in Rural Zones topic	Number of respondents
Proposed changes and goals	6
Review of minimum site size	12
Review of provisions related to high class soils	3
Review of approach to undersized sites	6
Sale of surplus dwellings	2

#### 3.8.1 Proposed changes and goals

Six respondents provided feedback on the proposed changes and goals for residential activity in the Rural Zone. Most feedback was supportive with two respondents making comments related to providing more flexibility in determining the productive capacity of land.

##### ***Flexible approach to land use***

- Federated Farmers is concerned at the indication that rural character and landscape values are likely to face further regulatory protection. Broadly, a planning approach to addressing these issues in effect tends to hinder the development of farming practices by taking a planning 'snapshot' of farming at one point in time and developing rules that meet the current farming practices. This is a particular concern where the DCC is attempting to develop rules to manage the perceived negative effects on rural character and landscape values. For example, soil type is only an indicator of the overall productivity of a farming operation; another is the flexibility to make land use decisions in response to changing markets and input/output factors, including resource management planning challenges. While fragmentation of land may be considered a negative effect, this should be balanced against the need to ensure that landowners have the ability to make land use decisions in response to the pressures of farming. We agree that there needs to be some planning response in respect to the likely adverse impact on urban infrastructure and service demand. This can in part be addressed through the strategic planning outlined in the Future Urban Development Zones. In addition, we encourage the DCC to consider these issues in respect to the pricing of these services.
- Need to consider allowing areas that comply with the Spatial Plan vision to be developed by the stakeholder if they want. This will allow a variety of sites on the market and help to keep land price down, which is what we need for affordable housing.

- Agree with the goals for managing residential activity in the rural environment.
- We agree that reverse sensitivity issues should be addressed.
- Agree with the goals and proposed changes that encourage development to give a wide variety of choice of sites and sizes.
- Agree with goals for managing residential development in the rural environment – changes to better manage subdivision, to prevent sprawl in semi-rural and rural areas and the protection of native biota is the correct direction for citywide development.

### ***Review of minimum site size***

The Q&A sheet explained one option to address minimum site size is to promote an approach to subdivision that encourages the best use and management of rural land using two methods – making subdivisions that do not involve residential development easier, and having a requirement for a management plan for subdivision.

12 responses were received on the review of minimum site sizes in the Rural Zones. Comments mostly referred to the current 15 hectare minimum and the proposed management plan approach, with some respondents suggesting that different rules should be employed depending on the area and circumstances. Protecting productive land and ensuring minimal fragmentation of rural land were also common themes along with site placement and ensuing landscape changes and reverse sensitivity issues.

### ***Current 15 hectare minimum***

- The following comments relate to the proposed Hill Slopes Rural Zone in the North-West Peninsula area, particularly that surrounding Macandrew Bay. Given that the current 15 hectare requirement for managing the spread of lifestyle block development “has been relatively effective” and no evidence is presented to confirm that “it may be having the unintended negative effect of encouraging very large lifestyle sections” what justification is there for the alternative “management plan” approach? Many of the stated positives of the management plan approach could be incorporated in the current minimum size requirement of 15 hectares.
- Stronger rules required to discourage subdivision of land, particularly to avoid the loss and fragmentation of productive rural land. All rural land in the Coastal Zone should retain a minimum lot size of 15 hectares with strong enforcement of this through the planning department and resource consent processes.
- The 15 hectare rule has served the DCC well in the sense that it has:
  - a. been relatively easy to administer; and
  - b. effective in protecting Dunedin from the indiscriminate loss of productive land.
- With regard to local food production, the 15 hectare rule serves to keep existing farming units intact. But it does not necessarily help those wishing to set up new, small-to-medium scale operations in the Rural Zone.
- Average site size/clustering – limit cluster size to three houses. Also require attached garages, grouping of curtilage, etc. as 'performance standards'.
- Federated Farmers agrees that the current 15 hectare minimum site size is too large, inflexible and has the potential to reduce the availability of productive areas by requiring an often unnecessary lot size. Would hope that a reduction in site size would provide for more small lot subdivision on a farm, for instance to provide for subdivision of a small part of a farm in response to economic pressures, or to accommodate family, or to allow for succession planning (as would some greater provision for family flats in the rural area).

### ***Management plan approach***

- A management plan for subdivision is complicated, involving considerable interpretation and regulatory input. The negatives of the management plan approach are well identified in the Q&A sheet.
- Blueskin Resilient Communities Trust values the acknowledgement of risk around a management plan in this document and agree that negatives may be experienced. This risk of increased subdivisions is the one of most concern among the risks of a 'management plan approach'. Such risks can be mitigated by ensuring that the Plan's Strategic Directions are up front and highlighted at every opportunity.
- Do not want to see further fragmentation of rural land but acknowledge that people other than farmers wish to live in rural areas. Most concerned with development which reduces the rural amenity of the area through poor siting of houses on prominent ridge lines, lack of landscaping and controls on design. The management plan approach to lifestyle development may allow smaller lot sizes and a greater number of houses in a subdivision by the well planned offer of environmental compensation. This may present well on paper but the follow through by land owners and the checks and balances by the DCC may be very poor.
- The 'management plan' approach sounds attractive in the abstract but is likely to be:
  - a. expensive;
  - b. complicated to administer; and
  - c. open to exploitation by land developers.
- The positive effects of the management plan are admirable goals but who will decide which parts of the property will be set aside from development? From Purakaunui Environmental Group's experience of observing developments within the North Coast Landscape Preservation Area, these decisions should not be left up to the developer, and as you note, it will be a complex matter for the DCC to administer. The Plan needs to be far more specific and prescriptive if these goals are to be achieved, including direction on minimum lot size. As the changes are currently worded, potential for a significant increase in rural-residential sites is very real.
- Extend the requirement for a management plan to all new residential activity in non-urban zones. The intention of this is to reinforce the DCC's goal of having productive farming as the primary land use in the non-urban areas. The management plan requirement can simply be triggered by, and be a required ancillary element 'attached' to, one of the building permitting activities, such as utility extensions/connecting new roadway entry approvals for driveways, etc.

### ***Different rules depending on the geographic area***

- The minimum block size needs to relate to particular areas, not a blanket designation over the whole of the Dunedin area. Thus, on the Taieri Plain or in the Middlemarch area, for example, it should be large enough for viable farming, but in Opoho, with appropriately-sited building platforms and building profiles, there need be no loss of rural character – indeed with the removal of gorse (manageable with small blocks), and sympathetic planting of trees, the appearance of the land would be enhanced, avoiding negative effects on rural character and landscape value.
- 15 hectare minimum subdivision has always been less than perfect. Agree with the proposals putting this up for rethinking – sometimes 15 hectares is far too big, and sometimes far too small. There are, as the 2GP acknowledges, pockets that may be ideal for cluster type rural subdivision below 15 hectares, and some areas where subdivision should not happen at all. Referring to the Otago Peninsula, but would assume it could apply to other areas as well.
- In the Rural Zone south of Dunedin, minimum site sizes should not be applicable, but based on factors such as effluent disposal, direction of residences and easy access.

### ***Lifestyle blocks and land management***

- Very careful consideration needs to be given to the size of lifestyle blocks. These are often not maintained to a high standard and noxious weeds become an even bigger problem. It needs to be recognised, if lifestyle blocks are sold, that this is a farming area and normal farm activities, eg cropping, cultivation, spraying and fencing, do take place. These activities should not face criticism and complaints as long as they are in line with safe farming practices.
- The threat of climate change and the increasing demand for homes in Dunedin that are close to the city, close to public transport, more energy efficient, better insulated and lie well to the sun for passive solar heating need to be taken into account when considering subdivision decisions.
- Must protect biodiversity of the city environs by ensuring that productive farming is not eroded in favour of hobby farming which changes the landscape immeasurably.

- The DCC is on the right track overall.
- The method of making subdivisions which do not involve residential development easier seems sensible.
- Blueskin Resilient Communities Trust favours the 'management plan approach' as an additional way to build in good process for changing times and new residential options such as 'co-housing' and to have processes for instances of managed retreat from climate change 'hot-spots' to more suitable zones.
- Federated Farmers agrees that the current 15 hectare minimum site size is too large, inflexible and has the potential to reduce the availability of productive areas by requiring an often unnecessary lot size. Agree in principle with the proposals to provide greater flexibility.
- Agree with goals for managing residential development in the rural environment – changes to better manage subdivision, to prevent sprawl in semi-rural and rural areas and the protection of native biota is the correct direction for citywide development.

### **3.8.2 Review of provisions related to high class soil**

Changes are proposed to strengthen the management of residential activities on high class soils with resource consent being required as a Discretionary Activity for any new residential activity in areas of high class soils.

Three respondents provided comments on high class soils, all in favour of prioritising protection of these soils from residential activity.

- Subdivision on high class soils should be Non-complying to protect our productive sector.
- Lots of vacant land in city already – don't want any more sprawl (eg Blackhead, Green Island – Bush Road and Waldronville shouldn't have happened). No more development of rural land – protect high class soil areas.

- Our Food Network strongly endorses the strengthening of the rules regarding high class soils.



### 3.8.3 Review of approach to undersized sites

The Q&A sheet explained that, as a result of historical patterns of subdivision, Dunedin has about 1000 historic rural sites of at least 1 hectare and under the current 15 hectare minimum that do not have dwellings. Detailed land analysis is being undertaken to determine whether these sites may be better suited to being areas for future urban expansion, zoning correction or areas to provide for additional rural-residential living.

Six respondents made comments on undersized sites in the Rural Zone. Two respondents stated that they wanted more information on the topic while others made suggestions about possible approaches for these sites.

#### **Additional information**

- The method and results of this review are needed for an informed comment to be made. Undersized sites in Macandrew Bay appear to be used for farming through lease arrangements between farmers and owners.
- Reserve comment on the matter of undersized historical sites until there has been a full analysis of these, and it is presented in a public arena.

#### **Possible approaches**

- There should be no weakening of rules governing undersized rural lots. These need to be dealt with on a case-by-case basis through the resource consent process.
- The Strategic Directions should guide decision making together with carefully prepared interpretations of key terms such as 'sustainable', 'long term', 'best uses', and 'sustainable economic prosperity'.
- Give preference to family legacy holdings and only allow building on lots subdivided prior to 1997. A workable idea for dealing with all the other undersized lots is for the DCC to sponsor their amalgamation and sale. The DCC's legal department would advise on a boilerplate incorporation agreement that would include, say, three neighbouring land owners of 5 ha each, combining to form a 15 hectare parcel that would then be put up for sale by their 'corporation'.
- Should not be looking at one small section of the past to justify more sub-development – should be looking to the long term future.

### 3.8.4 Sale of surplus dwellings

Approaches are being considered for allowing the sale of excess dwellings existing before notification of the 2GP, with the proviso that they do not fragment farmland.

Two respondents provided comments on the sale of surplus farm dwellings, one in support and one suggesting an activity status.

- Must be a Discretionary and not a Permitted activity.
- Agree that this should exclude future construction so as not to provide incentives for small lot development in a way that would work around the DCC's relevant planning provisions.

- Federated Farmers agrees with the DCC's proposal to investigate the potential sale of surplus dwellings not needed on-farm.



### 3.9 Information for farm owners in the rural environment

The Q&A sheet outlined information for farm owners about specific activities in the rural environment, including construction of farm buildings and tracks, selling and processing produce on site, operating tourist and commercial activities, and planting forestry blocks.

Table 10 presents the number of respondents who provided feedback on farming activities.

**Table 10 - Number of respondents providing feedback on information for farm owners**

Topics related to farm owners in the rural environment	Number of respondents
Farm buildings	1
Farm tracks	2
Farm produce (processing and sale)	2

#### 3.9.1 Farm buildings

The Q&A sheet explained that, in most of the rural environment, erecting farm buildings will be a Permitted Activity in the 2GP, subject to performance standards.

One respondent provided feedback agreeing with erecting non-residential buildings in the rural environment, stating that the performance standards for construction of non-residential development in the rural area do not appear to be overly onerous and will reduce the potential adverse effects on amenity values and head off potential reverse sensitivity issues.

#### 3.9.2 Farm tracks

Under the 2GP, most earthworks undertaken as part of normal farm practices will be permitted, with additional requirements where earthworks are located in Areas of Significant Conservation Value or in groundwater protection areas.

Two respondents provided feedback on the construction of farm tracks, one in support and one suggesting further provisions to ensure farm tracks blend into the landscape.

- Support the proposal to ensure that the construction of farm tracks, fencing, cultivation and harvesting remain Permitted Activities, though await the potential changes to these rules in Areas of Significant Conservation Value, or in groundwater protection areas to ensure these remain workable and appropriate.
- Farm access tracks should follow the contours of the land and, where this is not possible, have landscape plantings to help them blend in.

#### 3.9.3 Farm produce

The 2GP will make it easier to process and sell produce from a farm property. Selling produce from a property will be a Permitted Activity, subject to performance standards, while the processing of produce grown on-site will not require resource consent.

Two respondents provided supporting comments on the processing and sale of farm produce.

- Support the proposals to provide greater flexibility for the sale of produce and processing on-farm, and the intention to ensure there is sufficient planning flexibility for the development of complimentary commercial activities.
- Our Food Network strongly supports the 'enabling' approach to the sale of rural produce.

### 3.10 Rural-Residential Zones

To protect land that is important for sustainable economic prosperity, the 2GP will reinforce the expectation that residential activity in the Rural Zones should be for people engaged in farming activities, with rural-residential activity expected to locate in the Rural-Residential Zones provided for this purpose.

Table 11 below shows the number of respondents who provided feedback on Rural-Residential Zones

**Table 11 - Number of respondents providing feedback on Rural-Residential Zones**

Rural-Residential Zones topic	Number of respondents
Proposed changes and goals	3
Review of approach to undersized rural sites	1
Review of existing Rural-Residential Zones	6
Review of provisions for Rural-Residential Zones	4

#### 3.10.1 Proposed changes and goals

Three respondents made comments on the proposed changes and goals for the Rural-Residential Zone. While generally supportive, these comments focused on alternative zoning boundaries and the expected use of rural/rural-residential land.

- Agree to a point with the goal for managing rural-residential activity – a lot of farmland has been developed into rural-residential areas that are far from the Dunedin residential area, eg Brighton/Taieri Mouth Road. Also good farmland on the Taieri has been chopped up into 5 acre blocks while Abbotsford, which is closer to Dunedin (eg McMeakin Road, Abbotsford), is zoned rural and cannot be farmed or sub-divided. This seems to contradict the DCC's plan of preserving valuable farmland and does not appear to make any logical sense.
  - Other goals that are important – land use should be considered on an individual basis, eg farms of 16 acres that have poor soil (clay in the Abbotsford areas not suitable for good farming) or have been wrongly subdivided in the past.
  - Save The Otago Peninsula (STOP) is concerned that farming is defined as essentially the only productive use for rural land. Much of the land on the Peninsula is not economically viable as farm production units, especially for pastoral farming, but dedication to conservation is effectively an alternative productive use. Thus, the statement in the rural-residential Q&A sheet that residential activity in the Rural Zone should be for people engaged in farming activities is, in STOP's view, too narrow and should also encompass conservation activity.
  - Proposed changes are great if 15 hectares does not have to be strictly adhered to, especially if close to town (eg 10 minutes away).
- The new overlays that allow for activity status based on conservation and cultural landscapes, and the protection of discrete landforms, as well as farming, is supported.

### 3.10.2 Review of existing Rural-Residential Zones

The review of the location and extent of Rural-Residential Zones includes an analysis of the density of development in the rural-residential sites, undeveloped land in the Rural-Residential Zones, and the types of land uses that rural-residential land is being used for.

Six respondents provided feedback on the review of existing Rural-Residential Zones. All comments supported more rural-residential zoning and the majority of these comments made reference to specific areas that should be subject to rural-residential development.

#### **Additional Rural-Residential Zones**

- Disagree with 2GP urban form objectives which are to encourage more urban and less rural-residential. More good quality rural-residential will help attract and give more choice to new incoming residents. If landowners are willing to develop, they should be given the freedom to do so. A change that should be considered is side boundaries for buildings in rural-residential with odd shape being put back to 20m.
- Would like to see more Rural-Residential Zones to give people more choice of location – more sections available will help to keep section prices down, provide options for affordable housing and enable the open market to function. Encouraging development around existing infrastructure and established rural townships can increase economies of scale and service delivery and provide an alternative to development in areas subject to flood risk, land instability and areas prone to liquefaction in earthquakes (eg Taieri Plains).

#### **Rural-residential rezoning**

- The Chalmers Community Board supports the rezoning of the small cluster of houses at Blanket Bay from rural-residential to residential.
- It would be acceptable to apply rezoning to all properties over 1 hectare (but not allow them to be subdivided down to that minimum size) in the area between the lagoon and the DCC recreation reserve above Edinburgh Street (Waikouaiti) if:
  - houses blend in easily to the landscape and neighbours approve the change;
  - waste is managed from own properties, not extending the current sewerage system; and
  - submit resource consent application and build modestly, sustainably and in keeping with current landscape values.
- Accommodate potential residential developments with rural being rezoned to smaller blocks as there is increased demand for these – the most likely direction for rezoning being north of Mosgiel into Wingatui (when Tirohanga Road reaches capacity).

### 3.10.3 Review of approach to undersized rural sites

As part of the 2GP, consideration is being given as to whether any of Dunedin's many historic small sites are suitable for additional rural-residential living options, with the creation of new Rural-Residential Zones as one possible approach where a number of small sites exist in proximity to each other.

One respondent provided comments on undersized rural sites becoming rural-residential, stating that they do not support any 'blanket' approach based purely on the pragmatic principle of doing away with 'anomalous' entities.

- Note the potential conflict here with one of the stated aims for the Rural Zone ("*prevent the spread of rural-residential lifestyle block development*"). As a general principle, Our Food Network does not believe that, even if a block of land is not suitable for food production, this means that residential activity should automatically be considered as a permitted activity. Also note that, where these undersized lots are close to the city limits, these could be ideal for small-scale intensive food production in years to come.

### 3.10.4 Review of provisions for Rural-Residential Zones

The Q&A sheet explained that as part of the 2GP development process, the policy framework and rules that apply to Rural-Residential Zones will be reviewed. This included a review of whether the minimum site size of two hectares is still effective and whether any additional building or site design performance standards are needed.

Four respondents provided feedback on the review of provisions for the Rural-Residential Zones. Comments related to specific requirements that should apply, and many reinforced the important role that the Rural-Residential Zone plays in Dunedin.

#### ***Visibility, location and size of rural-residential sites***

- As the Q&A discussion paper notes, the restriction of residences to areas zoned rural-residential is fraught with difficulties. Save The Otago Peninsula (STOP) has, in the past, argued for such aggregates but is also aware that under the 15 hectare rule, the majority of owners of such blocks in our local area have also been very cognizant of biodiversity values and have undertaken conservation projects. The crucial thing here seems to be the visibility of the dwelling and driveways. Where the land owner has made the blending of their dwelling into the landscape a priority, combined with conservation covenants and/or revegetation, there is a win-win situation. However, this is not always true, and STOP feels that more stringent rules on siting of the building (preferably dug into the slope with no visibility on ridge lines), the colour of the building materials and the reflective nature of glass used is essential.
- Rural-residential section sizes should be dictated by their ability to handle sewage and storm water. Need to simplify subdivision applications, speed up time to process and reduce cost of application, as they all add to the cost of the section – communication with the public should be undertaken on how to achieve this.
- Agree with Rural-Residential Zones which protect the most productive soils – should stop subdivision on high class soils and areas prone to flooding.

#### ***Value of Rural-Residential Zones to Dunedin***

- The Rural-Residential Zones could have a significant part to play in the development of a more resilient local food system and agree that it is desirable that residential activity in these zones should be linked to farming. Rural-Residential Zones are significantly different from the Rural Zone and they also have their own unique character. There are currently many opportunities for these zones that are being missed under the current planning rules.
- Such a review needs to include careful consideration of food productivity, ecosystem services and place an emphasis on future-focussed design. Our Food Network would welcome the opportunity to provide input into this process. A planning process guided by a clear vision for the Rural-Residential Zones – one that promotes sustainability through integration of development within ecosystems and the enhancement of economic, social and environmental benefits – would be an immense service to the community.
- Lifestyle blocks can add to the biodiversity of land use – a small block means someone can have a mixture of vegetables, fruit and livestock, and permaculture would use the land to produce in a positive way.

- In agreement with the proposal for a thorough review of the zones and provisions for Rural-Residential Zones.
- Our Food Network strongly supports the suggestion that more analysis should be undertaken and that a full review of the provisions for the Rural-Residential Zones be conducted.

## 3.11 Industry

The 2GP will reinforce and significantly strengthen the policy approach of the current District Plan, which is to protect the Industry Zone from encroachment or competition from activities which pose a threat to the operational and economic success of industrial activities. Greater protection will be provided through a stronger policy framework and by giving activities such as residential and retail activities a Non-complying Activity status.

Table 12 below shows the number of respondents who provided feedback on the Industrial Zone.

**Table 12 - Number of respondents that provided feedback on industry**

Industrial Zone topic	Number of respondents
Provision for compatible non-industrial activities	2
Maximum height of buildings in the Industrial Zone	2
Clearer rules for landscaping	1
Storm water management	1

### 3.11.1 Provision for compatible non-industrial activities

The industry Q&A sheet explained that a limited number of commercial activities will be provided for on the basis that they are not suited to centres due to their low amenity, frequent heavy traffic movements or requirement for large yard space.

Two respondents made comments on non-industrial activities in the Industrial Zone. One suggested a change of activity status, while the second respondent desired the retention of the current zoning combination in Mosgiel.

- Would like to see residential activity made a Prohibited Activity rather than a Non-complying one in this zone; except for allowing, as a Controlled Activity, one dwelling per industrial site to allow for occupation by an owner, manager or night-watchman.
- Retain the land that is zoned industrial/commercial in Mosgiel.

### 3.11.2 Maximum height of buildings in the Industry Zone

It is proposed to set a maximum height limit in the 2GP for buildings in the Industrial Zone, with an exception to allow for structures associated with industrial activities.

Two respondents provided feedback supporting the proposal to set a maximum height limit.

### 3.11.3 Clearer rules for landscaping

It is proposed that performance standards will be redrafted to be clearer and possibly extended to be applied to where Industrial Zones adjoin other key routes or other zones.

One respondent made comments in favour of performance standards for landscaping in the Industrial Zone, stating that they support this aspect and the extension to where the Industry Zone adjoins other routes and zones, such as along the Southern Motorway into Dunedin.

### 3.11.4 Storm water management

The industry Q&A sheet presented one option for the inclusion of rules that require on-site storm water management systems to be constructed at the time of development of a site.

One respondent provided supporting comments around storm water management in the Industrial Zone, stating that moves to support greater efficiency of storm water management are essential.

### 3.11.5 Other industry comments

Three respondents made comments on the Industrial Zone that did not fall under one of the above topics. These comments related to the Portsmouth Drive Industrial Zone, requirements that should be included for industry in the 2GP, and a recommendation for additional provisions.

- Pleased to see that Portsmouth Drive is not listed as a Commercial Zone, as it is a prime area for location of hotels, entertainment, restaurants and sports facilities. A Sports and Hospitality Zone is what seems to fit. With new land available at Carisbrook, plus Burnside, the supply of industrial and commercial land may be adequate and current business owners could be encouraged to vacate Portsmouth Drive by very gradual restriction of the issuance of building permits. At present, this prime waterfront is an eyesore and a vastly misdirected Dunedin resource.
- The Plan needs to:
  - Ensure services are in place to support industrial zoned land to function as per the District Plan, ie Dukes Road lacks service infrastructure.
  - Acknowledge the huge demand for freehold land.
  - Support the development of land to allow it to be used for a set purpose.
- A TAB outlet at the corner of Waverley Street and Hillside Road remains zoned as industrial in the draft 2GP. It is important to recognise this established activity within the District Plan rather than the owner/operator relying upon existing use rights under the RMA. It is more appropriate to provide for this outlet's on-going operation within the new planning provisions, for example: *Retail activity where existing and 'legally established' at the date of the proposed District Plan shall be a Permitted Activity in the Industrial Zone.*

### 3.12 Major Facilities Zone

The importance of Dunedin's major facilities to the city's social and economic wellbeing will be recognised in the 2GP to provide for their on-going operation and development, while also managing their effects on surrounding environments, through a new Major Facilities Zone.

Four respondents provided feedback on the Major Facilities Zone. Most of these comments sought more information on the types of facilities to be included in this zone and how certain activities would be treated to ensure their continued operation.

#### ***Ensuring flexibility in the Major Facilities Zone***

- The University would only support the inclusion of the campus within this new zone if it has status as a campus sub-zone with its own objectives, policies, activity definitions and development standards. It is acknowledged that the DCC wishes to recognise the contribution of major facilities to the city via an appropriate regulatory regime which allows for growth. However, there is only limited similarity in the development needs of each user group, for example the Stadium does not necessarily require flexible development standards for new multi-storey buildings, but the University does to facilitate the vision of the Campus Master Plan. It is vital that the tertiary sector maintains its identity while continuing to be an integral part of the city community.
- Any policies developed for this Major Facilities Zone must not be restrictive to the extent that commercial activities associated with sport, recreation, and education use are too restricted. Sport and recreation is increasingly dependent on sponsorship and private investment that would expect recognition, profile, and the opportunity to gain exposure.

#### ***Further information***

- Does the proposed Major Facilities Zone include the Edgar Centre, Dunedin Bowls Centre, Dunedin Ice Stadium, Sunnyvale Stadium and Mosgiel Stadium? It is noted that Moana Pool is included in this proposed zone, which would indicate that other pools in Mosgiel, Port Chalmers, and St Clair would also fall within this zone.
- How are the most significant major sports fields/complexes to be classified? Will, for example, the Oval and Logan Park fall within the 'new recreation' zone or 'Major Facilities Zone'? Sport Otago would suggest that, while the Oval would most likely fall within the 'new recreation' zone similar to Peter Johnstone Park, Bishopscourt, Corstorphine, Brockville and Bayfield, Logan Park would best sit in the Major Facilities Zone and be treated as one entity encompassing the hockey turf, tennis complex, bowls, Caledonian Athletic and Football Stadium, University Cricket Oval, and surrounding fields, including the Sargood Centre housing Sport Otago and the Otago Polytechnic Institute of Sport and Adventure. This would allow for this sport and recreation precinct to be treated as one all-encompassing area consistent with the Logan Park Development Plan which should also be cross-referenced within the proposed District Plan.
- Will the Major Facilities Zone contain specific performance standards, objectives and policies to schools as distinct to other Major Facilities? Will the Ministry of Education have an opportunity to provide feedback on the Major Facilities Zone performance standards proposed prior to the notification of the proposed plan? What will the process be for making a change to the Major Facilities Zone if a school was closed or a new school opened? How would an early childhood education centre (ECE) on an existing school site be treated – would it come under the MFZ for schools? Does an ECE on a 'stand alone' site qualify as a major facility?

➤ Acknowledge and support the Major Facilities Zone and approach.



### 3.13 Major Facilities – Port

A major goal for managing ports in the 2GP will be to enable the ports to continue operating and to change over time, while managing their effects on the surrounding environments, especially residential ones, by including performance standards that require port operations to minimise effects such as noise and glare on neighbouring areas.

The current Plan approach of identifying the likely extent of port noise, mapping a Port Noise Boundary and Port Outer Control Boundary, and requiring new residential dwellings to be acoustically insulated will continue. The 2GP will include a new Outer Control Boundary that is based on revised modelling which reflects the Port Otago Limited 'Next Generation' project.

Table 13 below presents the number of respondents who provided comments on the Port Zone.

**Table 13 - Number of responses received related to Ports**

Port topic	Number of respondents
Review of Outer Control Boundary	6
New standards for light spill	7
Review of height limits	10

#### 3.13.1 Review of Outer Control Boundary

Six respondents made comments on the Port Otago Outer Control Boundary and noise emissions from the Port. These comments were largely in favour of much stronger regulations around noise pollution.

- Performance standards for this area are highly technical and it is acknowledged that progress has been made on resolving this issue over the years. Keen to see standards aimed at protecting public health maintained and advanced.
- Port Otago Limited (POL) considers that basing the new location of the Outer Control Boundary on noise modelling that reflects the POL 'Next Generation' project is appropriate. This reflects the stated goal by recognising that the Port will change over time and that the associated noise effects can be managed by extending this tried and tested off-site mitigation work. POL considers it appropriate that performance standards for acoustic insulation are set requiring the achievement of specified indoor design levels for new residential buildings within the Outer Control Boundary. POL supports the continuation of the current approach to noise management in Port Zones through the identification of the likely extent of port noise and mapping a Port Noise Boundary and Outer Control Boundary, and requiring new residential dwellings to be acoustically insulated. For existing buildings, the Port Noise Management Plan will enable a range of options for noise mitigation taking into consideration land owner preferences.
- Port Otago continually fights off any discussion on how to mitigate their noise at the source – we're talking about the hours of 11pm-7am – night time hours. Port Otago Limited needs to become good corporate citizens and work towards compromise for the health and welfare of the residents. It is possible for both to exist. It requires fair mindedness and thinking outside the box – hush technologies/getting rid of generators/cold ironing – there is a myriad of new hush technologies available but Port Otago has no consideration for compromise.
- It is outrageous to say that the community has been consulted with, and go ahead with whatever the Port Company wants. The Port is allowed to make as much noise as it likes



in Careys Bay and expects the residents of Careys Bay to suffer for that decision. The residents of Careys Bay had to take the Port Company to the Environment Court to get the minimal restrictions that are in place – big cost in terms of energy/money and now you think it is ok to remove them. This is the 21st century – the DCC should take into account more than economic benefit.

- Rules on reclamations at Port Chalmers should be rewritten to give effect to the conditions that the Environment Court originally placed at the time of construction. Port noise needs to be controlled by both Lmax and L10 noise controls in line with other industrial zones adjacent to residential uses.

### 3.13.2 New standards for light spill

The current rules for lighting do not include any measurable standard. It is proposed to limit light spill from Port operations to a limit of 10 lux onto any site used for residential purposes from 10pm to 7am.

Seven respondents provided feedback on the proposed new standards for light spill from Port operations. The majority of respondents, with the exception of Port Otago Limited, opposed the 10 lux proposal.

- The Southern District Health Board appreciates the need to introduce controls for light spill and is supportive of those. While ships fall outside the DCC's jurisdiction, we would like to see that identified as an issue and a plan put in place to address it.
- 10 lux seems a very high allowance for night time light intrusion. The Institute of Lighting Professionals recommend a maximum of 5 lux for town/city centres with high levels of light night time activity and recommend 1 or 2 lux for a small town centre or suburban location. The light the Port company produces is enormous (you can see it from many coastal vantage points) – should be made to reduce this and not increase it.
- Oppose changes to lighting levels proposed by Port Otago Limited at the Port and surrounds. Lighting in Careys Bay should be a 1-2 lux maximum.
- Port Otago is encroaching on our space and think that the compensation package that was laid out in 1994 should be acceptable now in the 21st century. There has been no effort made on the part of Port Otago, DCC or ORC to even contemplate compromise in this 2GP scheme.
- It has taken 15 years for the Port to turn off their lights when there is no activity. Understand that a healthy shipping industry is good for the region, but to be consistently ignored for over 20 years of the creeping loss of amenities, especially in sleep hours, with no independent monitoring, is undemocratic.

➤ Port Otago Limited (POL) supports greater specificity and certainty around management of light spill in the Port Zone. The inclusion of a measurable standard for light spill from port operations will provide this certainty. POL considers that a limit of 10 lux onto any site used for residential purposes is appropriate and consistent with the management of light spill in the rest of the city.

### 3.13.3 Review of height limits

The Port Q&A sheet explained that, to increase efficiency and meet growing demands, it has been suggested height limits should be increased. There is a desire to increase height limits in Port Chalmers from 8.7m at Boiler Point and 10m at Back Beach to a height of 15m which will enable containers to be stacked five high, and from 15m to 25m in other areas, allowing containers to be stacked eight high.

Ten respondents provided feedback on the review of height limits for Port Otago. The majority of comments strongly opposed any increase in height limits for the Port.

- District Plan rules around container height stacking need to be strengthened to meet the intent of Environment Court Decision C66/2002 – ie that the storage height at Boiler Point is limited to three high other than when necessary immediately before and after super-ship visits. Allowing an increase in height of the container stack will result in negative impacts on amenity within Careys Bay as follows:
  - Loss of visual amenity (blocking of Harbour and Peninsula views);
  - Increased noise nuisance due to intensification of use;
  - Increased stack height will mean increased height of light towers and therefore more light pollution;
  - High illuminated container stack would affect night time visual amenity; and
  - Loss of overall character.
- Reject Port Otago's application to increase container storage on Boiler Point because:
  - The Company has already desecrated a once beautiful vista with high stacking and now wants to completely destroy what is left.
  - The noise generated by the 'management' of the existing stack is the cause of much discontent among residents, and can surely only get worse with the construction of what will be an absolute eyesore.
- Oppose the plan to increase container stacking heights because:
  - This would mean that there would be a permanent seven high container stack as they flaunt the rules already meaning a permanent five high container stack (they see moving them every two weeks as keeping to the rule);
  - There is a court ruling for the three high stacks. If they flaunt the court, what would they do to a DCC ruling;
  - A seven high container stack would be an eyesore and block off all views of the harbour;
  - Seven high container stacks would be dangerous for visitors to Boiler Point – the path has to be closed now in high winds, so it would have to be closed more often as a seven high container stack would obviously be more unstable than a five; and
  - The Port Company was given the right to reclaim Careys Bay and Back Beach for container and log storage. They then proceeded to build large warehouses on the reclamation. Should remove warehouses or store containers in another location (as they do with logs/chips) if they need more space.
- Do not agree with Port Otago's proposal for extra height for container stacks due to the devaluation of living standards for neighbours.
- Port Otago Limited confirms its support for the increase in container stack height at the Boiler Point and Back Beach areas of Port Chalmers to 15m, provided there is the ability for short term stacking of up to seven containers in these locations. For the other areas at Port Chalmers, the suggested height limit of 25m, enabling the containers to be stacked eight high, is supported. The exemption from height limits should apply to lighting towers as the spillage of light is now proposed to be controlled by the new lighting standards.

The plan also needs to clearly state that the height limits do not apply to cranes both at Port Chalmers and Dunedin.

- Environment Court made a final considered judgement that containers could only be stacked three high, with occasionally five high. The environment has not changed – why is a change being considered? Port Otago Limited want to change the rules on a decision that they already break the rules on – they continually flagrantly disregard the Court rules with no redress, any concerns expressed are arrogantly ignored. When are there going to be enforceable consequences and what will be the monitoring process to address Port Otago's appalling attitude to its residential neighbours!
- The Chalmers Community Board does not support increasing stack heights at Port Otago to 15m at Boiler Point/Back Beach and from 15m to 25m in other areas.
- Oppose the Port's proposal to increase container stacking heights to seven containers on a continuous basis. This is excessive. At present, the Port stores containers five high on a regular basis at Boiler Point – to increase this to seven will create more noise and block views from Careys Bay of the Harbour and Peninsula beyond. Rather than increase the height to seven, the current three high height limit should be implemented with five high only before the arrival and departure of super ships.
- Strongly disagree with increased height limits at Boiler Point. Already dissatisfaction with noise and light levels and an increase in the number of containers will lead to further increase in noise and light, and also be extremely visually intrusive.
- 25m not a problem but keep sight line clear from main street through to Harbour.

## 3.14 Community and Recreation Activities

Dunedin has a range of accessible social and cultural facilities and spaces, which are managed to enable arts, culture, recreational and other community events and activities. These will be managed in the 2GP through changes to recreational areas and reserves, temporary activities and community activities.

Table 14 below shows the number of responses received for topics related to community and recreation activities.

**Table 14 - Number of responses received on community and recreation activities**

Community and recreation activities topic	Number of respondents
Proposed changes and goals	2
Temporary activities	2
Recreational areas and reserves	6
Community activities	3

### 3.14.1 Proposed changes and goals

Two respondents provided feedback on the goal and proposed changes for community and recreation activities. One respondent felt that the direction of this section was lacking while the other suggested an addition.

- Not sure if the goal for this chapter is sufficiently forward looking.
- Suggest the 2GP could include a statement to address access issues to cliffs around the city environs for rock climbing (including Long Beach, Mihiwaka, Lovers Leap and more). These cliffs contain some of the easiest and some of the most challenging for the rock climbing community. You may even want to add a policy for bolting (anchors drilled in the rock for protection) and also for the protection of flora and fauna. Many of these issues have been faced throughout the country by various councils and with the assistance of the New Zealand Alpine Club, invariably good outcomes emerge.

- The goal for managing community and recreation activities is good.

### 3.14.2 Recreational areas and reserves

The current Plan does not specifically identify open space or recreation locations or values, which are instead zoned the same as the surrounding environment. The 2GP will recognise the values of reserves, and provide for and manage the activities occurring on them using a proposed Recreation Zone along with better provision for reserves within other zones where they exist.

Six respondents, all representative of larger organisations, provided feedback on recreational areas and reserves. Responses were all in favour of amendments to the proposed Plan. Many comments related to additional provisions, health and safety, and the recognition and protection of certain areas.

## **Rules and definitions**

- Who will determine the policies, rules and procedures for the management of recreation areas and facilities? Sport Otago would expect that this function would continue to reside with Parks and Recreation and assume that its input and comments in influencing the District Plan will be taken regard of. Currently, even small changes such as the movement of earth to improve and reconfigure a BMX track at Forrester Park require the BMX Club to apply for resource consent and it exposes them to costs that a small sport struggles with. Where an existing use exists, we would advocate providing a mechanism for the DCC to consider small improvements, enhancements and developments without the necessity of exposing sports and clubs to major planning processes, consent procedures, and hefty costs.
- The arbitrary defining of formal and informal recreation in its current form is confusing and likely to create problems of definition. For example, 'informal recreation' actually occurs on a frequent basis in areas of formal recreation. It is extremely difficult to separate out the two, but a better definition and clearer delineation is required between formal organised sport and what is now determined to be casual utilisation.
- The Dunedin Amenities Society is concerned the 2GP will undermine the legal status of reserve areas and their defined activities within legislation such as the Reserves Act 1977. This is particularly pertinent in relation to the reserve management plans whereby activities are publicly to be undertaken as defined in the management plan for that particular reserve. This adds another layer of management that is largely unnecessary. Performance standards over development could be appropriate in the 2GP, but not in relation to defining or regulating recreation activities defined by the Reserves Act.
- It seems counter to the proposed Plan that *"smaller neighbourhood reserves and small reserve areas in commercial centres would retain the zoning of the surrounding environment"* and that they would have *"policies and rules that recognise the value of reserves, recognise informal recreation and temporary activities that take place on them, and address any effects of these activities."* These areas have existed and been managed quite successfully without the definition of the District Plan, often for more than 100 years. It is not the role of the DCC to define how or for what purpose the community can use these areas for. That is defined by the Reserves Act.

## **Health and safety**

- The Southern District Health Board (SDHB) is aware that a number of councils have adopted management plans for the various parks under their control and wonder if this is an approach that would be worth doing for Dunedin (if it is not done already). It is through these management plans that controls can be put in place regarding smoke-free, healthy public policy as it applies to event management etc. The open space and facilities section in the 2GP provides the DCC with a unique opportunity to contribute to the goal of a smoke-free New Zealand by 2025 through designating zones within the city smoke-free (e.g. Campus Zone, playgrounds, sports fields, beaches and outside cafes).
- The SDHB advocates for the protection, expansion and maintenance of off-street recreational areas for safe play and informal sporting activity. This is of particular importance within residential, rural and high deprivation areas. By providing sufficient opportunities for informal play, vulnerable populations that often have less opportunities for formal physical activity are enabled to be physically active.
- Concerns that children's needs have not been considered well enough in the current Plan and should be more firmly integrated beyond playgrounds – it is important to promote all spaces as child-friendly play spaces, which has implications for traffic, public spaces, sidewalks, etc. Need environments that can engage children in diverse play activities independently and encourage their creativity (eg choice of activities: green spaces with climbable trees, bushy areas, water features).

### ***Recognition and protection of recreational areas***

- There is no specific reference to Ocean Beach Domain, virtually exclusively recreational in nature, with a significant number of sports fields and sport and recreational facilities. Due to coastal erosion issues, the future of this area is uncertain. Suggest that a 'special designation' be developed to allow the DCC to carry out any mitigation and remedial work with certainty and in a timely manner.
- Recognising the recreational values of surf breaks along the Otago coastline – although these surf breaks lie outside of the area of the District Plan which only extends to the mean high tide water line, they are affected by activities on land within the jurisdiction of the District Plan. These surf breaks can only be accessed from the land, therefore safe and public access to these surf breaks must be maintained.
- The University supports the introduction of a new Recreation Zone for parks and reserves in the city, and assumes that Logan Park will be included in this zone under the proposed formal recreation category. It is hoped that as the owner, the University's formal use rights will be recognised in the 2GP and that University activities will not be unreasonably restricted by new development standards.

### **3.14.3 Temporary activities**

The current Plan does not define temporary activities or provide any standards or guidance for when consent is required. It is proposed that the 2GP will define temporary activities and make them a Permitted Activity on reserves and roads where they meet a set of performance standards.

Two respondents provided feedback on temporary activities. One was supportive of provisions with the expectation that current annual events would be able to continue in the same manner as at present, but the other believed the section to be too restrictive.

- The University hopes that activities will be permitted on the Museum Reserve and the campus grounds to allow for Otago University Students Association activities such as Orientation Week and the International Food Festival.
- The three-day limit for temporary activities/events does not represent current reality and must be amended – it is far too limiting, particularly as it relates to sport and recreation. Provisions must therefore reflect the nature and extent of activities and not restrict the economic gains these events bring into the city. The provision for temporary events/activities therefore needs to be more flexible and extend for a longer period and also be adaptable considering the nature of the event. Going forward, the city will be hosting events running for two weeks or more, eg NZ Special Olympics Summer Games, NZ Masters Games, NZ Athletic Championships, and the FIFA Under 20 World Cup.
- The provisions for creating temporary structures are far too restrictive and totally unworkable and need to be reviewed in conjunction with Parks and Recreation.
- Sound for events/activities is far too restrictive, eg athletics events at the Caledonian Ground start earlier than the time suggested in the draft provisions. This ensures that the full range of events is completed within the time available during daylight hours. Any move to impose restricted hours for sound/announcing needs to be discussed fully with all sports to ascertain the real impact and together develop a set of guidelines that are practical and do not impact on the city's ability to attract and host events, whilst also ensuring that local sport is not handicapped and constrained.

- The University supports the inclusion of temporary events such as markets and fairs in the new Plan.

#### 3.14.4 Community activities

The Q&A sheet explained that changes are proposed to improve Plan effectiveness and clarity with respect to community activities. The current Plan contains a definition for Community Support Activity which covers a broad mix of activities. It is proposed to split this definition to better recognise and provide for where these activities typically occur, and to tailor appropriate performance standards to each activity based on their likely effects.

Three respondents made comments about community activities, expressing concern that the section was too restrictive in places.

- Must not constrain community use of school facilities, but rather develop provisions that encourages use, ensuring that within school grounds, facilities, and buildings there is a range of Permitted Activities including the ability of schools and the Ministry of Education to carry out repairs, maintenance, enhancements, and developments within reasonable and practical guidelines, inclusive of being able to charge and gain revenue from community use.
  - The definition of community activity needs to be broadened to include 'sport and recreational activities'.
  - Important for the University that campus related activities are afforded their own definitions as tertiary education activities under the 2GP. The suggestion that all education activities – primary, secondary and tertiary, should be defined as 'Education Activities' does not recognise the fundamental differences in scale, development needs and potential environmental effects between types of education services.
- The Ministry of Education notes the proposed changes with respect to community activities and supports the inclusion of Early Childhood Centres in Residential Zones and Suburban Centres.

### 3.15 Heritage

The heritage Q&A sheet sets out that the 2GP will aim to ensure that significant items and collections of built heritage are retained, well-maintained, and actively used. This will be achieved following the same format as the current Plan, with changes to the Heritage Schedule and a review of Heritage and Townscape Precincts.

Table 15 below presents the number of respondents who provided feedback on topics related to heritage.

**Table 15 - Number of respondents providing feedback on heritage topics**

Heritage topic	Number of respondents
Proposed changes and goals	4
Heritage Schedule	4
Review of Heritage and Townscape Precincts	9

#### 3.15.1 Proposed changes and goals

Four respondents provided feedback on the proposed changes and goals for managing built heritage. The majority of these comments related to the proposed Stuart Street Precinct and ensuring the retention of the precinct. Other comments were based on amendments to activity status and the importance of character and amenity value protection as well as the buildings within precincts.

##### ***Stuart Street Heritage Precinct***

- Goals that are important for the Stuart Street Precinct:
  - No 'infill housing' or 'granny flats' be allowed in this heritage precinct.
  - Gardens, trees and green spaces be seen as important aspects of the precinct.
  - A streetscape plan be developed to complement the buildings in the precinct.
  - Pedestrian traffic be given more consideration so walkers can appreciate heritage.
  - Encourage homes to be owner-occupied to engender inner city community.
  - Owners of rentals to take more responsibility for their buildings and streetscape.
- Another goal should be to retain the current, comfortable mix of owner-occupied homes and investment properties. We do not want to see the area deteriorate or develop into a medium density extension of the Campus/North Dunedin area which will discourage family ownership.
- Stuart Street is very long and this precinct would be better identified with its outstanding heritage building and be called Otago Boy's High Precinct [two respondents supported this change in title].
- Concerned at the idea of higher density zoning – would like to keep the family character of the area and not be dominated by student rentals and witness the negative social and visual changes that have crept into other parts of central Dunedin.
- Don't want the medium to high density housing like student area in Cargill Street.
- Agree that resource consent should be required for all new buildings within this heritage precinct. However, if they are to be seen as a Controlled Activity, then the rules for the zone need to be tight enough to ensure that the characteristics of this precinct are retained – ie green space behind, maximum height and height of neighbouring properties, sun/shading, boundary setbacks etc.
- It is not only the streetscape that should be protected, but that which is within the triangle, so that consent would be required for additions and alterations, demolition, and



construction of new buildings not just visible from a public place, but those which might affect other properties within the triangle – their green spaces, views, and sun etc.

### **Activity status**

- Agree that any new buildings or alterations must be of good design. Allowing non-character contributing buildings without resource consent as a Permitted or Controlled Activity has the potential for disaster as far as high quality design is concerned. These are the very properties that need some consideration before they are altered, rebuilt or added to. Would support an architectural review panel to consider all alterations and new buildings and offer advice as required. Suggest the panel consist of an architect, planner/s, landscape architect and heritage specialist.
- Agree with the concept of a finer-grained approach, whereby rules are targeted to 'character-contributing' buildings, but consent as a Restricted Discretionary Activity should be required for alterations to non-character contributing buildings.

### **Character and amenity values**

- Agree with this goal for managing built heritage but disagree with the focus on the buildings alone. The goal should be amended to state: *"Significant items and collections of built heritage, as well as the character and amenity values of the heritage areas, are retained, well-maintained, and actively used."*
- Green space at the rear of sections is just as important as the view from the street.
- New buildings should not have to replicate surrounding buildings, but the design must be sympathetic to the character of the area. An architectural review panel to consider new building design would be a good idea.

- Agree that significant items and collections of built heritage should be retained, well-maintained and actively used.
- The proposed heritage overlay in the Stuart, Cargill, Arthur Streets, and York Place triangle is an excellent example of the city's growth/social history.
- Agree with the principle of preserving Dunedin's character and heritage.

### **3.15.2 Heritage Schedule**

The Q&A sheet explained that the Heritage Schedule is being reviewed and is likely to lead to new buildings being added to the list, while some will be removed where their heritage values are no longer considered significant enough.

Four respondents made comments, mostly raising concerns around the cost and restriction placed on building owners and developers.

- Nervous that, once rules are made, they may be administered in ways that create barriers for valid and worthwhile new building developments. Possibly also making repairs to old buildings expensive and complex, so that the buildings are left to decay even worse.
- Owners have to pay mortgages, maintain repairs and manage tenants. A lot of Dunedin housing is old, some beyond repair, so if the owner wants to demolish a building, it is their right. Maybe the rebuilding architectural design should be sympathetic to surrounding buildings if they are good quality and possess longevity in their main structure, more so in heritage precincts. A lot of old buildings need to be replaced and it is sometimes more economical to rebuild. Planning regulations on old buildings must become more flexible allowing 45m<sup>2</sup> per habitable room down to 35m<sup>2</sup>; this will make managing renovations on old buildings more economically viable. There should also be flexibility on site coverage and outside amenity area. Given the difference among Dunedin's old properties (age, layout, configuration in rooms, the way they face, etc.), planning rules should vary for each individual building and be looked at with their own

merits – good and bad. If something is Non-complying, it can be overlooked because owner is going to add another room, renew kitchen, add another bathroom, etc.

- Without viable tenants, heritage buildings will continue to be lost from neglect or from the owner's inability to pay for earthquake strengthening. The more retailers that relocate south to Andersons Bay Road/Crawford Street, the less chance for finding viable tenants for the old buildings south of the Octagon.
  - It is hoped that the review of the current District Plan Schedule of protected buildings will allow for careful consideration of the needs of building owners, so low value buildings and parts of buildings, and those buildings which are scheduled for extensive redevelopment that would benefit the city such as the upcoming Dental School (Walsh Building) project, are not subject to overly restrictive development standards in the new Plan.
- The proposals to allow for repairs and earthquake strengthening works without resource consent to encourage building owners to improve their buildings are considered appropriate. The consent controls over restoration and redevelopment are also accepted.

### 3.15.3 Review of Heritage and Townscape Precincts

Currently, there is confusion between Townscape and Heritage Precincts. The 2GP proposes to simplify this regime and focus the precincts on heritage values. There are two new Heritage Precincts under consideration (Queen Street and Stuart Street) and Townscape Precincts in South Dunedin and St Clair are to be removed.

Nine respondents provided feedback on Heritage and Townscape Precincts. Along with a number of supporting comments, feedback related to areas that should (or should not) be designated, provisions for heritage precincts, and the activity status given to new buildings and alterations.

#### ***Specific heritage areas***

- Re-visit areas of historic importance as many have been missed out, such as Canongate, Arthur, Brown and Duncan Street, etc. Canongate is one of the older residential areas in Dunedin, with original constabulary cottages circa 1870s – need to protect and embrace the heritage of this area.
- Support the removal of the South Dunedin historic precinct and historic façade identifications because:
  - The buildings in South Dunedin are somewhat of an eclectic mix of size, quality and styles, and are of a much lesser quality than other historic precincts in the city.
  - Some of the façades are lower than the current 6m height requirement.
  - Many of the current façades are 'old' rather than 'historic'. Because something is old should not merit its retention.
  - There are other ways to preserve the character and history of a precinct other than retention of façades.
  - Allowing contemporary design without the need to comply with heritage values could be an exciting step forward for the city and precinct.
- Dunedin has enough heritage precincts – no more.

#### ***Content of Heritage Precincts***

- Concern about the siting of infill housing in these precincts – where the character-giving buildings in a precinct are built facing the street and parallel to each other, in-fill structures, if they are visible from the street, should also be parallel to each other and street-facing. Some of the provisions of the Residential Zone, such as the encouragement of placing outside areas where they will receive sun, may conflict with the preservation of this characteristic of some heritage precincts.

- New developments need to fit in with the existing surrounds. Old architecture needs to be preserved and respected. New architecture should either imitate or totally work in with the juxtaposition – there are too many bland, cheap looking boxes.
- The heritage overlay should have precedence over 'Medium Density'. All current green areas should be protected within the precincts.
- Despite best efforts, it is not possible to make an old timber home fit for purpose in this climate. One cannot appropriately insulate old weather boards and lath/plaster walls, or double glaze traditional-style windows. In a 'first world' country of the 21st Century, it is not right that people should still be living in these unhealthy old homes. Ultimately, homes are for people to live in, and heritage comes second.
- Would like to see rules that are not too prescriptive, to avoid 'faux heritage'. Instead, rules that encourage interesting and innovative new design (quality, sustainability, energy efficiency and aesthetics). Design that not only complements the heritage precinct, but, in 100 years from now, are also appreciated as heritage buildings. Now is the time to build our future heritage, as well as preserve our past.
- The 'retention and maintenance of built heritage' has to include not only the structures but also the historic pattern of development, including streetscape elements (such as the relationship of street to site frontages), and building density, otherwise the 'character' that the character-contributing buildings bring to a heritage area will not be maintained. For example, Queen Street area has a conservation value that includes the original relationship of its wooden villas to the narrow street carriage and stonewall and original planting remnants that characterise it.
- The details of rules for buildings that do, or do not, have heritage value, do not need to be the same. Concerned that the proposed approach will not prevent significant degradation of the character of the area as the amenity effect of proposed development appears to only address the 'street-view'.

### **Activity status**

- Additions and alterations to non-character contributing buildings should be a Restricted Discretionary Activity, with the requirement that, at a minimum, the character of the area will not be reduced, and preferably any additions or alterations will improve it, for example, by reference to the design guidelines that are proposed for new buildings in the area.
- New buildings should be a Restricted Discretionary Activity within the proposed Heritage Overlay as buildings of an inappropriate size or placement have been shown to reduce existing amenity value. Consideration of the amenity and heritage values of the area requires a greater level of discretion than that provided by a Controlled Activity.

- The rules for alterations to character-contributing buildings should be as proposed.
- Agree that a good baseline for design approval (of new buildings) would be 'quality' of materials, design detailing, habitable quality and aesthetics.
- Support collapsing the townscape and heritage precincts and support the other ones identified.
- The University gives its preliminary support to the creation of a new Heritage Precinct in North Dunedin which includes University property on Castle Street, and it is hoped that private property owners will also support the introduction. The retention of the existing Campus Heritage Precinct is also supported.
- Support comments made regarding criteria for designating a building as 'character'— ie would you live in it?

### 3.16 Renewable Energy Generation

The Q&A sheet explained that Renewable Energy Generation (REG) technology has developed significantly since the first District Plan was written and is likely to become an increasingly common and desirable form of energy production. The 2GP will aim to enable REG in appropriate locations and the generation of energy for use on-site, and small-scale energy generation in general. Large-scale will also be provided for, subject to remediation of potential adverse effects.

Table 16 presents the number of respondents commenting on topics related to renewable energy generation.

**Table 16 - Number of respondents providing feedback on renewable energy generation**

Renewable Energy Generation topic	Number of respondents
Proposed changes and goals	6
Energy resource investigation devices	1
On-site energy generation devices	6
Small and large-scale renewable electricity generation	8

#### 3.16.1 Proposed changes and goals

Six respondents made comments on the goals for REG. All respondents were supportive of the goals, with a few additional suggestions.

- Don't have wind turbines in residential environments as they are noisy. Respondent lives in a rural area and can hear one 1000m away.
- Should consider incentives to install solar panels.
- These are related goals – are there provisions for residents to install composting toilets and provide black water re-use (in rural areas)? Is there provision for all residents to be able to install rainwater tanks and use that water necessary for their gardens and other outside use? These provisions are necessary.

- Agree with the goal for managing renewable energy generation.
- Extremely supportive of the new provision for REG within the 2GP. Agree with the goal for managing REG and would go further to suggest that REG is the most desirable form of energy production and should facilitate growth in REG as a priority to provide for our environment, our communities and our economy.
- Generally strongly support the goals and proposed changes.
- Chalmers Community Board supports the concepts laid out in the plan to enable renewable energy generation in appropriate locations, including the generation of energy for use on-site, and small scale energy generation in general.

#### 3.16.2 Energy resource investigation devices

The REG Q&A sheet explained that devices needed to investigate or assess the availability of a renewable energy resource on a particular site would be Permitted Activities in Rural and Industrial Zones, subject to performance standards. In other more sensitive zones, these devices would be Restricted Discretionary Activities.

One respondent provided feedback requesting that temporary masts should also be permitted (subject to performance standards) in Residential Zones, Recreation Zones, and some Landscape Overlay Zones. The respondent also approved the table of activity statuses as set out, with the provision that some improvement could be made in applying a wider set of permissions for energy resource investigation devices.

- Approve the removal of resource consent requirement for meteorological masts.

### 3.16.3 On-site energy generation devices

This category includes devices that generate energy primarily for the use of an activity that is taking place on the same site, for example, a roof-top solar panel, a micro-hydro system or a domestic-scale wind turbine. The Q&A sheet explained that the activity status of an on-site energy generation device would be the same as the status of the activity to which the device is providing power.

Six respondents provided feedback on on-site energy generation devices. Comments were generally supportive, with some respondents providing suggestions to encourage the uptake of on-site REG.

- The University is an advocate for sustainability in operations management and in building design where possible, and its academic staff are involved in various community projects for the introduction of wind turbines and other energy installations for sustainability and community resilience. It is hoped that the 2GP will also allow for businesses and institutions to install small appliances as well as residential households.
- A non-regulatory method of providing education, information and advice could be a better option if the DCC is serious about encouraging renewable energy's uptake (rather than just allowing for it). Rules can create unintended outcomes. Effective non-regulatory methods, where there is uncertainty about the outcomes of rules, can help give the expected outcome.
- Wind turbines create noise nuisance and adverse visual effects for neighbours when located in front of their main windows. Having to look at a rotating wind turbine outside one's main window would be an intensely annoying experience.
- Protection for existing solar panels and proposed solar operated devices can be compromised by adjacent development. When one seeks to purchase a home, one can see what is next door and up-sun, and judge what the maximum development can be, and what effect it may have. That can be taken into account in whether a solar device can be installed. That device should then have its sun penetration protected.
- Would prefer that no resource requirement be made for small wind turbines, ground-mounted solar panels and micro-hydro in Landscape Overlay Zones. Do not favour more restrictive performance standards for roof-top solar panels in Landscape Overlay Zones.
- The removal of the need for consents and the relaxation of present rules will help to reduce costs and paperwork for people who want to move to a more sustainable way of powering their homes. Distributed energy, (ie production of energy at the site where it is used) is the most efficient use of resources and increases the resilience of households and local communities to be able to cope with future challenges.

- Most definitely agree with solar-heated water.
- The intention to make the use of small scale household power generation easier for residential dwellings is very welcome.
- The University welcomes the introduction of development standards to govern renewable energy products of domestic, community and national scale in Dunedin city.
- Blueskin Resilient Communities Trust supports the suggested changes for on-site generation.

### 3.16.4 Small and large-sale renewable electricity generation

It is proposed to manage wind farms, hydroelectric generators, biomass generators and arrays of solar panels as Restricted Discretionary activities, Discretionary Activities or Non-complying Activities, depending on their scale and location. Large-scale and small-scale classification is to be determined depending on whether the activity meets a set list of performance standards or not.

Eight respondents provided feedback on small and large-scale renewable energy generation. Although these comments referred to large-scale and small-scale generation generally, they were mostly based on concerns for wind farms and wind generation with two respondents also mentioning hydroelectric.

#### ***Large-scale renewable energy generation***

- Large wind projects, dams and solar arrays should be Non-complying regardless of where they are sited and it is essential that they are notified. Non-notification has been one of the main causes of residents' annoyance and disquiet about such proposals and has, for example, with a wind farm proposal at Greta Valley, North Canterbury, often led to expensive and long drawn out litigation for the proposers, opponents and councils alike. The draft Plan suggests extra protection of Significant Natural Landscapes, Outstanding Natural Landscapes, Outstanding Natural Features, Areas of Significant Conservation Value and Recreation Zones, but this still leaves huge areas of rural land with inadequate protection.
- The draft plan fails to take account of the infrastructure and construction issues associated with power generation projects. Road formation and power lines could have a major impact on landscape values and these also need to be fully scrutinised through the resource consent process. The aim of making it easier for power generation projects in the DCC area may be seen as a good thing for sustainability but projects beyond the household scale are commercial businesses and, even if they have community involvement, must be open to wider assessment and feedback.

#### ***Small-scale renewable energy generation***

- Small scale power generation on any 'commercial' level, be it community, co-operative or corporate-owned needs more controls. The proposal that such projects in the Rural Zone should be Restricted Discretionary only will limit the full assessment of the impacts of such proposals. Notified resource consent is essential for commercial scale projects so that local people can have input into the size, number, location and other possible impacts.

#### ***Wind energy generation – scale and location***

- The Waikouaiti Coast Community Board is not supportive of the extent that the DCC seeks to loosen the rules around wind generation, but is supportive of self-production for individual properties where there is little or no effect on neighbours. It is unlikely that any generation scheme can be considered a truly community scheme as such. Commercial structures will need to be put in place, assets in community ownership today may well end up in private ownership tomorrow. If wind generation is to be permitted, then the DCC should define specifically the locations where this is to be allowed and more importantly, the scale and extent. This will allow the community to have a direct input into these matters through the District Plan process.
- Concerns regarding some of the draft proposals relating to the activity status of suggested provisions for renewable wind energy generation. This has a particular negative effect as any wind turbine above 45m has considerable impact on those living close by. Wind farms will create considerable damage to the rural landscape from several points of view including the loss of the reasonable enjoyment of amenities – eg horse riding. It will also obviously have a negative effect on property and landscape values not



to mention the creation of adverse effects such as unacceptable noise levels and the horrific visual pollution. The same level of protection should be given to rural ratepayers in regards to the effects of wind turbines as those that live in the city and therefore the DCC planners should make it mandatory for all applications relating to wind turbine resource consents to be publicly notifiable.

- Much greater attention needs to be given in the District Plan to questions of scale and performance standards in relation to potential wind farm installations in the Dunedin area. Under the draft 2GP rules, the door remains wide open to wind generation schemes which can easily utilise 'soft' rules around community-based renewable energy projects – and what reasonable person does not wish to support such initiatives? These projects are manifestly industrial in scale and have very little actual community benefit. Dunedin citizens paying residential rates in rural or semi-rural areas of the city deserve the same level of protection from the adverse effects of wind turbine installations as our city dwellers. For these reasons, the DCC needs to make publicly notifiable resource consent mandatory for all wind turbine applications.
- Of particular concern here is the definition of 'small-scale' in the section of the proposal relating to wind farms. Need to take into account the fact that a reasonable number of Dunedin citizens actually live in hillside dwellings that are close to potential wind farm sites. Turbine installations of a maximum height of 85m or 125m considerably exceed the ordinary person's view of what is small scale. At this level, REG shifts from being a reasonable individual or community project activity to becoming a commercial and industrial activity. It should now be clear to planners from the New Zealand and international evidence of the negative impact of wind farm turbines of 45m and above on the wellbeing of those living nearby is considerable. Solar generation is silent and of low visual impact, large turbines on the other hand represent a considerable incursion into the rural landscape from several points of view including the loss of the reasonable enjoyment of amenities, a negative effect on property and landscape values, and the creation of adverse effects such as unacceptable noise levels, the damaging of water catchment areas and the destruction of wildlife habitats.
- Concerned about the cumulative effects of lots of small-scale wind farms – better to have one big wind farm than lots of little ones.
- Concerned about land being used for wind farms near where residential development is likely to increase in the future (eg Blueskin Bay). They should be put in less visually intrusive locations where there is less likely to be residential development. Light on the rotating blades pulses and causes significant visual impact and attracts the eye – wind turbines should be located in places where they will have less visual effect.
- Concerned about fairness/precedent – if you allow a wind farm on one site, then why not every site (eg around Blueskin Bay).
- Wind turbines should not be allowed in or near Areas of Significant Conservation Value, other conservation areas or sites with high biodiversity, primarily due to the potential for bird strike but also due to the potential alteration of drainage, groundwater and vegetation etc. resulting from infrastructure requirements associated with turbine construction and maintenance. Wind turbines, for example, would not be appropriate near the Orokonui Ecosanctuary (now a Permitted Activity in the adjacent land rezoned rural) as they might threaten valuable re-introductions such as Kaka and would certainly preclude the re-introduction of bats and colonial seabirds such as Titi, both of which are active at night. Similarly, turbines should not be sited close to areas with high concentrations of birds, especially those that migrate and travel in flocks or are endangered. Estuarine habitats such as Blueskin Bay, harbouring up to 2000 godwits and oystercatchers and several hundred endangered endemic Black-billed Gulls, are especially vulnerable. Essentially, there should be a requirement for a 'buffer zone' around sensitive

sites. Expert assessment of potential sites is needed to establish these types of hazards and this is unlikely to occur under a Restricted Discretionary consent.

- Blueskin Resilient Communities Trust (BRCT) supports the use of technology-specific performance standards instead of mega-watt (MW) thresholds. The performance standards for wind farms are still on the restrictive side (max five turbines at 85m, or max three turbines at 125m height), given that technology is changing. While BRCT does not anticipate anything bigger at present, it may be wise to increase height limits to 125m and 165m respectively. To avoid confusion, it would be best to designate that the heights refer to hub height (if they do – preferable) or blade tip (if that is the case).

### ***Hydroelectric energy generation***

- Dams should not be permitted on watercourses in, or that subsequently traverse, Areas of Significant Conservation Value, other conservation areas or sites with high biodiversity, eg the streams that feed into the Orokonui Ecosanctuary, one of the rare examples of a stream with no introduced trout and a high number of native fish species.
- These comments are in relation to potential installation of offshore wave power generating machines, which if placed in the swell corridor of the surf breaks will adversely affect the surf-able quality of the waves. Future placement of these energy producing wave machines should consider the effects on these surf breaks.

- Support and congratulate the DCC for the proposed changes to encourage smaller scale Renewable Energy Generation.
- Blueskin Resilient Communities Trust supports the proposed changes to hydroelectric generation.
- Agree that large-scale REG should have Non-complying status within Outstanding Natural Landscapes.



### 3.17 Natural Hazards

The Natural Hazards Q&A sheet sets out that the preferred approach to managing the risks from hazards is based on considering the overall risk from the hazard in terms of both frequency and effect. The key priority is the protection of people, including loss of life, injury, the risk of being cut off from Civil Defence assistance, or the failure of key infrastructure required to ensure the health and safety of communities.

Table 17 shows the number of respondents who provided feedback on Natural Hazards.

**Table 17 - Number of responses for Natural Hazards**

Natural Hazards topic	Number of respondents
Goals	3
Creation of Hazard Overlay Zones	5
Management of activities in South Dunedin	2
Hazards posed by earthquakes	2

#### 3.17.1 Goals

Three respondents provided feedback on the goals for managing hazards in the 2GP. Comments mostly agreed with the approach, but a number of additional goals, or amendments to stated goals, were suggested.

- Goals should include protecting key services such as hospitals, bulk fuel supply, and bulk food storage facilities.
  - When assessing risks, vulnerabilities as well as hazards must be identified. Loss of, and damage to, buildings and infrastructure have significant flow-on social and economic effects. Consequently, when weighing the costs and benefits of hazard mitigation to the built environment, more than life safety must be considered. Multi-faceted, long-term strategies for dealing with Dunedin's key hazards should be developed. For example, for areas identified as vulnerable to liquefaction (eg South Dunedin). These strategies should, and must, include measures to promote sustainability and citizen self-efficacy in disaster risk reduction, and otherwise develop and build community resilience.
  - Agree, in general, with the goals for managing natural hazards. However, mention should be made of the risk of natural hazards as being a 'dynamic risk' in that often what are described as singular risks (sea level rise, flooding, storm surge, alluvial fans) combine dynamically to present significant risk to people and property.
  - A goal of 'managing any retreat from climate change hot-spots' could be added, as residents (in Waitati at least) desire local government participation in confronting the challenge of maintaining residential activity in climate change hot-spot zones and any transition out of hot-spots into safer areas. This part of the 2GP would ideally have an ability to adapt, as the situation changes. As NIWA scientist Andrew Tait said, "we no longer live in a world of stable climate change and stable coastlines" and none of us knows what that means or what it will bring.
- Support DCC's goals for managing natural hazards, and the fact that the DCC intends strengthening the controls they propose putting in place.
  - Generally strongly support goals and proposed changes.
  - Applaud the DCC for being clear about the risk in climate change 'hot-spots', the largest of which is South Dunedin.

### 3.17.2 Creation of Hazard Overlay Zones

The current Plan does not itself identify the extent or location of any hazards. The 2GP will have three overlay zones relating to flooding, coastal and land-based hazards.

Existing activities will be able to continue operating based on existing use rights, but alterations to buildings in higher risk areas which increase site coverage will be Non-complying or Discretionary activities.

Five respondents provided feedback on the creation of Hazard Overlay Zones. Comments were generally positive, with one respondent requesting further information and another suggesting a requirement for permits for deforestation to reduce risk of land instability.

- Would like additional information on the proposed hazard zones in order to better understand the limitations proposed on these areas.
  - Have seen the repercussions of uncontrolled removal of forestry from commercial forestry blocks over the past four years. Any significant deforestation or change of vegetation cover from significant areas (quantity open to discussion, but say 1acre+) should require a permit, much in the way that earthworks requires consent if over a certain threshold. The consenting process would then be able to assess the proposed vegetation removal in light of knowledge on natural hazards, and provide pragmatic advice on staged removal over time and re-planting requirements, or insist on professional opinions supporting the vegetation removal activity. This would also offer an opportunity to record such requirements in perpetuity on future LIM or PIM searches.
- The Ministry of Education supports the introduction of the Hazard Overlay Zones to the District Plan and the proposed additional rules and controls based on the level of risk faced for a particular site. This ensures any future development on sites will be informed of existing hazards associated with the site.
  - Pleased to see a move by the DCC to acknowledge hazard areas and to restrict development or provide more comprehensive information to potential property buyers.
  - Support the intention to specifically allow for farming in in Hazard Overlay Zones and ensure farming will be subject to fewer performance standards. This is appropriate given the different scale of risks to farming activities compared to residential or other land use.

### 3.17.3 Management of activities in South Dunedin

The 2GP approach to South Dunedin is to continue providing for commercial uses in the Industry and South Dunedin Centre Zones, but limit residential development to existing levels. The difference in approach reflects the overall approach in the 2GP to manage sensitive activities, such as residential activities, more cautiously when located in areas which are vulnerable to a natural hazard.

Two respondents supported the approach for South Dunedin.

### 3.17.4 Hazards posed by earthquakes

The risks from earthquakes relating to the safety of people are addressed to some extent through building design, which is primarily managed by the DCC's Building Services under the Building Act. The safety of existing buildings is being addressed at a national scale through measures such as those relating to the earthquake strengthening of buildings.

Two respondents commented on earthquake hazards, both suggesting that liquefaction should be addressed in hazards relating to earthquakes, especially in vulnerable areas, eg South Dunedin.

### 3.18 Natural Environment and Biodiversity

The retention and restoration of Dunedin's natural environment and biodiversity is important. It is proposed that this be achieved by policies to:

- Identify and protect areas of significant indigenous vegetation and fauna as Areas of Significant Conservation Value and/or QEII covenants.
- Identify green and blue corridors.

Table 18 below shows the number of respondents who provided feedback on topics related to the natural environment and biodiversity.

**Table 18 - Number of respondents commenting on natural environment and biodiversity**

Natural environment and biodiversity topic	Number of respondents
Proposed changes and goals	5
Review of Areas of Significant Conservation Value	4
Review of Urban Landscape Conservation Areas	2
Conservation activity	2
Options to improve biodiversity	2
Green and Blue Corridors	5

#### 3.18.1 Proposed changes and goals

Five respondents provided feedback on the proposed changes and goals for the natural environment and biodiversity. Most responses were supportive, but comments were made about communication between councils, archaeological sites, potential effects on landowners and effective compliance monitoring.

- In some sections of the 2GP, liaison with the Otago Regional Council has been mentioned. This is a section where that needs to be a stated procedure, so that waterways and adjacent land are managed in a synchronised manner between the councils.
  - When restoring and/or increasing areas of biodiversity, it is most important to investigate any archaeological sites that are present in such areas. If not covered adequately in other sections, there is a need to state this here.
  - Federated Farmers is concerned at the proposed policies. Appreciate and support the intention to incentivise and liaise with landowners to achieve these goals. However, without details around what this may mean for landowners, it is difficult to assess.
  - Save The Otago Peninsula (STOP) agrees with many of the proposed changes, but notes that a revised plan is just the start. Implementation of the Plan requires well informed decisions at hearings committees followed up by effective compliance monitoring. In STOP's opinion, compliance monitoring of resource consents on the Otago Peninsula is poor and we hope that new rules will address this.
- The Chalmers Community Board agrees that the natural environment of Dunedin and the significance of its biodiversity is widely recognised and valued by the community and supports the objectives of the 2GP where it states that "areas of indigenous biodiversity are extended with improved connections and resilience."
  - Blueskin Resilient Communities Trust supports the goals for managing the natural environment and support the preferred option of green and blue corridors.

### 3.18.2 Review of Areas of Significant Conservation Value (ASCV)

A project to update the ASCV schedule has been undertaken involving the identification and assessment of potential ASCV with a view to protecting them within the Plan where landowner agreement has been obtained. Sites are only included within the Plan as an ASCV if landowners agree. Currently, clearance or modification of indigenous vegetation in Rural and Rural-Residential Zones requires resource consent. This rule is referred to as an interim rule and is intended to be removed when updating the ASCV schedule.

Four responses were received on ASCV. Two respondents were concerned with the content and boundaries of the ASCV, while two opposed the removal of the interim rule.

#### **Content and boundaries of ASCV**

- In Save The Otago Peninsula's (STOP) view, assessment, identification and protection of ASCV through a schedule in the Plan is a reasonably effective method, but additional methods are required. In our opinion, the criteria for acceptance as an ASCV is set at a high standard. There are landowners on the Peninsula with a strong interest in the biodiversity on their property, but the assessment does not meet the significance criteria. The existing method excludes these landowners, which is unfortunate. STOP suggests an additional category called 'Areas of Conservation Value' (ACV) that sets the bar lower and also takes into account the future potential of the site. ACV would be listed on a schedule in the Plan and property owners eligible to apply to the Dunedin Biodiversity Fund. It would not be expected that ACV would be approved by QEII Trust for Open Space covenant status. An ACV scheme would fit well alongside the proposed green corridors. A landowner with indigenous vegetation on a property within the green corridor network may be encouraged to manage the vegetation for biodiversity if incentives are available. In the long term, an assessment of the biodiversity values and range of ecosystems in all the identified ASCV needs to be undertaken and appropriate protection applied to ensure the on-going viability of native flora and fauna in Dunedin.
- Agree that the objective to control the amount, type, scale and design of subdivision activities will help enhance the natural environment of Dunedin. However, the reduced area boundaries that have been set, with particular reference to the Northern Coastal Landscape Zone, have diminished the ability to protect the natural environment and biodiversity of this area. The legal challenges in the courts contain determinations of land values which have clearly not been reflected by the DCC in the compilation of this consultation document. Purakaunui Environmental Group is disappointed and respectfully request that you review the court documents with a view to incorporating outcomes of the case in the new 2GP.

#### **Removal of the Interim Rule**

- The Waikouaiti Coast Community Board does not support the removal of the 'Areas of Significant Value Interim Rule' – concerned that this has the potential to lead to degradation of biodiversity in the Coastal Zone and throughout the city.
- Left with only tiny areas of native vegetation and natural habitats in the DCC area – essential that a very high value is placed on existing remnants. The new District Plan clearly outlines a set of guidelines to provide protection for these areas. Concerned, however, that the Plan proposes the removal of the 'Interim Rule' that prevents destruction of these areas by land owners who have little interest in, or understanding of, the importance of these natural assets. The DCC has been working on a process of establishing ASCV, but at the good will of the land owner volunteering to be part of the process, so the likelihood of on-going protection of any area containing important biodiversity is not guaranteed under the ASCV concept. Any clearance or modification of indigenous vegetation in the Rural or Rural-Residential Zones must continue to require resource consent in the new plan, as applies under the 'Interim Rule'.

### 3.18.3 Review of Urban Landscape Conservation Areas (ULCA)

A review of ULCA has determined that it has been applied in most cases to public reserves. A large number of these reserves are sports grounds with limited vegetation cover and do not meet the intent of a ULCA. The Q&A sheet explained the preferred approach in the 2GP is to zone large reserves as part of a new Recreation Zone which will better recognise the values of reserves, reducing the need to include such areas as ULCA.

Two respondents made comments about the ULCA. Both valued the role that ULCA played in protecting Dunedin's natural environment.

- The protection and management of natural environments is one of the core values of the Dunedin Amenities Society. ULCA are extremely important mechanisms within the current Plan for the protection of these areas.
- Concerned about the ULCA being superseded. Sport/field reserves should not have been included and need their own category. Many bits of bush around town presently under the ULCA need protection as they are. Automatic transference of the right to build a number of units on a proportion of a bigger estate needs addressing. The city prides itself on its beauty of setting within nature to be viewed, and possibly appreciated, from a multitude of points.

### 3.18.4 Conservation Activity

The current Plan does not specify clearly whether planting and restoring areas of biodiversity is permitted. A new definition for Conservation Activity is proposed under the 2GP.

Two respondents commented on the new definition for Conservation Activity, both supportive of the definition but also suggesting additions.

- Include conservation as a recognised productive activity.
- It is important to legally establish Conservation Activity and endorse the definition and that it should be a Permitted Activity in the relevant zones. As a result of subdivisions of large pastoral farms, the new owners of lifestyle blocks are increasingly undertaking activities to protect and enhance biodiversity on their land. The Plan should acknowledge this change and recognise Conservation Activity as a productive use of land in the goals for rural land.

### 3.18.5 Options to improve biodiversity outcomes

To improve the effectiveness and efficiency of methods relating to biodiversity and the natural environment the preferred option is to develop a Green and Blue Corridor Overlay.

Two respondents made comments about the options to improve biodiversity. Both favoured the preferred option of Green and Blue Corridors.

- Save The Otago Peninsula strongly endorses the proposal for the development of a Green and Blue Overlay to provide an overall framework for Dunedin. It is important to have a long term vision so opportunities can be taken up as and when they arise.

### 3.18.6 Green and Blue Corridors

The Q&A sheet explained the preferred option to improve biodiversity outcomes is to develop a Green and Blue Corridor Overlay that will provide a framework for the management of biodiversity and its associated values (including open space, recreation and landscape) with an emphasis on restoration of ecological integrity in the longer term.

Five respondents provided feedback on the proposed Green and Blue Corridors. Comments mostly related to possible additions and alterations within the corridors, strengthening of rules and definitions, and relationships with landowners.

### **Green Corridors**

- ULCA are often unique and might get blanket-treatment under the green corridor regime. Their wildness is crucial to balance the over-development that constitutes a city. Some of these areas are threatened by potential development that would not necessarily be the best use of land. Another concern is to do with the clearance of indigenous vegetation, especially what is called 'scrub'. This could be a healthy mix of coprosma, mahoe, manuka, fuchsia, wineberry, etc., all self-generating without needing to be planted or taken care of but clearance of grass is important in most cases. Gorse in big patches is very special to this area of the world and needs to be maintained – their bloom is the gold in Otago's colours (but any new plants should be taken out by the roots as well as Pinus Radiata). A lot of so-called weeds are useful, at least for firewood, and should not be denigrated. Sycamore, for example, is a good maple wood that has a variety of uses – the syrupy leaves are a favourite of sheep and possums (which will eat sycamore before eating natives). So having a few sycamores isn't a problem, but an asset – however, if any of those trees seed-up, those branches should be removed.
- In the existing Plan, sites that are important for biodiversity are scattered in terms of 'planning' and some UCLA sites are not recognised for their value to biodiversity. Green Corridors could incorporate a whole range of biodiversity on public and private land. As well as the existing areas listed, Save The Otago Peninsula (STOP) suggests the inclusion of specified road reserves. Road reserves on the Otago Peninsula, often steep banks with no access for grazing stock, can have a surprisingly high number of the less common indigenous plants, eg silver fern, three finger, and lancewood. The policies to protect and enhance Dunedin's biodiversity rely quite heavily on private landowners. However, by identifying particular road reserves in the Green Corridor overlay, this would enable the DCC to demonstrate what can be done to enhance biodiversity with appropriate management. Road reserves are very visible to the public and some targeted work, eg weed removal or planting quick growing native trees among gorse to reduce spraying, would be an excellent way to educate the public.
- To get the full benefit of a Green Corridor network, the gaps in the network need to be shown on the overlay so that opportunities to create links are clearly identified in the plan. STOP does not agree that incentives to encourage restoration and/or planting should be restricted to when development occurs. Would like to see incentives available for any resident within the Green Corridor. Incentives need not be expensive, for example a few native trees that provide food for native birds.
- STOP has concerns about the clearance or modification of indigenous vegetation in existing Green and Blue Corridors being a Discretionary Activity, as well as the proposal that indigenous vegetation clearance in Green Corridors is related to a certain area threshold. Will this threshold be a proportion of the total area? In our experience of similar instances, Council hearings committees lack appropriate expertise when decisions are made that affect the ecology of an area. The DCC might go to an ecological consultant in connection with a major resource consent application, but not for a smaller matter. At present, landowners present witnesses and technical evidence, but DCC planning reports rarely include ecological aspects of the proposal.
- A particular concern is the proposal to identify and manage Blue and Green Corridors. While these areas have value to both the community and the individual landowner, the DCC is strongly encouraged to consider the on-farm costs (both present and future) of these proposals. Farmers have generally proven happy to provide protection to biodiversity values where these have been identified on-farm, and where these values have been explained to them. However, protected areas have generally been easy to



fence off, manage and exclude stock from. If the areas of protection are being expanded to include smaller patches of biodiversity, this will be more difficult for landowners to manage around. The proposal to make land management within these Green Corridors a Discretionary Activity will create significant costs for farmers. Landowners are better at both protecting and policing areas of biodiversity than councils are where they are appropriately informed and incentivised. Many of the areas of biodiversity that currently exist on-farm are there specifically because farmers have opted to forego economic production to protect these. Rather than a planning approach to protection of 'Green Corridors', the DCC is encouraged to fully adopt the landowner liaison role, with the aim of explaining these inherent values to landowners, providing land use options and information, and incentives for landowners to protect these areas. Support the proposal to make conservation activities a specifically Permitted Activity.

- The last sentence of this Q&A paragraph on page 4 reads "It could include ...." Change the word 'could' to 'shall'.
- In addition to providing "incentives when development occurs" in Green Corridors (restoration linkages), include more incentives to landowners of undeveloped properties.
- Add a third bullet point for activities in Green Corridors (restoration linkages) that reads: "House building performance standards that are more rigorous than for zones or overlays." Include restrictions on curtilage and require attached garages.
- There is merit in the proposed Green and Blue Corridors because of the attention to restorative habitat potential, but the definition of these requires very careful consideration. To name only areas of indigenous vegetation does not include the biodiversity value of areas with a predominance of weed or exotic vegetation.

➤ A network of Green Corridors shown as an overlay in the 2GP would be excellent.

### **Blue Corridors**

- The Dunedin Amenities Society (the Society) would like to see a coastal corridor included in this part of the proposed Plan for discussion and emphasis on wetland values included in the Blue Corridor, particularly in Rural Zones. While the concept of the corridors looks appealing, the Society hesitates to endorse the concept without further information.
- A network of Blue Corridors would be excellent. Support the inclusion of coastal habitat, but do not agree with the restriction to important waterways. The Otago Peninsula lacks any large waterways, possessing instead a network of creeks and small streams. For example, the extensive Smith's Creek catchment extending from the upper slopes of Peggy's Hill to Bacon Street, Broad Bay. Small creeks in Portobello and Macandrew Bay are currently being restored by local communities. A network of creeks extending from Pukehiki to Boulder Beach flow mostly through farmland at present, but have great potential for future enhancement. Because of the likelihood of subdivision, STOP would like these creeks included in the Blue Corridor Overlay.
- STOP supports the identification of areas within Blue Corridors where esplanade/reserve strips are required upon subdivision, but has concerns over any reduction in these requirements. Also concerns over the implementation of the rule on clearance or modification of vegetation within 5m of a waterway identified as a Blue Corridor being a Restricted Discretionary Activity. Migratory Galaxiid native fish require riparian vegetation to lay their eggs; therefore clearance of this vegetation will prevent the fish from breeding. The small creeks on the Otago Peninsula have no introduced trout and provide important habitats for Galaxiid fish. However, it is quite acceptable to modify the vegetation by replacing weed species with native species to enhance freshwater habitat.
- Provide a better definition of important waterways. Consider the option of including small streams if the distance between larger important waterways exceeds one kilometre. This would be in order to protect against localised species extinctions by providing a broader matrix of habitat.

### 3.18.7 Other biodiversity comments

Three respondents provided general comments about the natural environment and biodiversity. These related to the effects of onshore activity on surf breaks, long term protection for the Peninsula, and consideration of potential effects of climate change on biodiversity:

#### **Surf breaks**

- Otago Coastal Guardians wants to ensure that sand dune systems are included in potential protection as an indigenous environment. Natural sand dune systems are vital for the stable functioning of the dunes themselves, as well as the beach profile leading down to the tide mark. These elements are significant in the natural cycles of sandbank formation offshore in the surf zone which dictate the surf-able quality of the waves in the recreational surf zone activity area.
- When development on land has the potential to affect surf breaks, the effects must be considered on the surf breaks. For example, the lowering of the natural landscape feature at the Blackhead headland from quarrying changes the dynamics of the wind patterns which, in turn, affects the formation and quality of the waves at the Blackhead surf break.

#### ***Framework for protection on the Otago Peninsula***

- Natural ecosystems on the Otago Peninsula are fragmented and many lack long term protection. However, the number of covenants that have been established by private landowners in the past 30 years, plus the biodiversity on public land, provide a framework on which to build.

#### ***Climate change and biodiversity***

- The draft Plan makes no reference to the impacts of climate change on biodiversity and specific habitats. Although some aspects of this may be difficult to determine, predictions of things like sea level rise and increased extreme weather events are well documented and the consequences of such changes need to be considered in assessing the continued viability of Areas of Significant Conservation Value and the potential changing importance of other areas and habitats.



## 3.19 Other

A number of comments were received about issues that did not relate directly to any of the categories presented in the Q&A sheets. These either related broadly to a range of topics, or topics not covered by the Q&A sheets. Comments highlighted issues such as protected trees, community involvement, rainwater harvesting and amateur radio operators.

### 3.19.1 Significant Trees

Four respondents made comments about protected trees. These comments were largely in favour of extending protection for significant trees, with two respondents also suggesting that protected trees should be treated with similar rules to buildings and be removed or pruned if they are oversized or shading properties.

- Recommend protection of all native trees over 6m in height, requiring Discretionary consent for removal.
- The scheduling of significant trees, while a useful exercise in defining and creating an inventory of significant trees, does not add weight to their overall protection in the landscape. The Dunedin Amenities Society (the Society) would prefer to see all trees over a certain height/mean breast width/species protected across the entire city. This would then require owners of trees wishing to have them removed or pruned brought into contact with professional advice from the city arborist who could assess the tree for its value and whether removal or pruning was appropriate. After that stage, the applicant could then pursue resource consent for the removal/pruning proposal. The Society feels that the DCC should be taking a greater advocacy role for the protection of trees as opposed to a regulatory one. The issue here is dialogue between arboriculture professionals and the applicants, who in some situations may be ill advised as to the best options for the tree in the property. Once that dialogue is created, better options for the protection of the tree maybe arrived at through consultation and discussion. That is a better outcome for the applicant, the DCC and the environment that is less adversarial.
- People who have significant trees on their property who protect them should be feted and rewarded for their efforts. The Society would like to see:
  - Rates or similar remissions for owners of significant trees that protect them.
  - An advocacy and advisory role provided by the DCC's arborist for tree owners.
  - A binding arbitration system for removals rather than a consenting process.
  - Publicity and public recognition of individual landowners who are good tree owners.
  - Greater encouragement for people to plant trees in the landscape, particularly urban areas.
- Trees keep on growing – what starts off as an attractive sapling can quite quickly become an oversize, out of place nuisance to the neighbours. When one seeks to purchase a new home, one can see what is next door, and judge what the maximum development can be, and what effect it may have. Trees are a 'moveable feast'. To protect the neighbour's sun penetration and amenity on residential sites, trees should be subject to the same bulk and location restrictions as buildings.
- Protected trees that shade properties should be allowed to be removed.

### 3.19.2 Community involvement

Three respondents made comments about transparency for the community and the consultation and submission process. These comments specifically related to informing the public of all changes to the Plan, making it easier for the public to partake in the submission process, ensuring transparency around the intention of zones, and no reduction in requirements for notification of resource consents.

- There are many other 'changes' which should be considered for the Q&As above, but public input can only practically focus on the Q&A changes released on 5 August. All sections of the current Plan need to be sequentially sent to the public and identified as 'No Changes' where that is the case. It would be a consultation phase error in assuming that the public have any knowledge or recollection of all the topics addressed in the current District Plan.
- DCC personnel need to consider making it easier for the public to make a submission on this 2GP, especially as it is such an important and strategic planning document. Need to have summary documents easily accessible/obtainable to be picked up or sent on request (rather than having to find a large number of files online), as well as detailed documents available on request.
- The 2GP needs to provide for increased transparency and definition around the intended purpose of any given zone – ensuring the intent of the zone is honoured and there is no room for (mis)interpretation and ad-hoc decisions, while allowing some flexibility for unforeseen requirements where the community will benefit, eg if a community centre was required and the preferred site was not zoned favourably.
- There should be no reduction in the requirements for notified resource consents for local projects or developments so that people in our community can be fully informed and have input into DCC decisions. Notified resource consents help to measure the level of community concern, provide a local perspective and local knowledge to help planners and councillors make good decisions and allow all sides to be heard if the proposal is contentious. The process can also help applicants have a better understanding of the effects of their proposals and agree with conditions more readily.

### 3.19.3 Citywide rainwater collection

One respondent considered that it is important to encourage rainwater collection across the city, stating that: "we should all have rain barrels collecting the rainwater run-off from our roofs. Not everyone in the city can afford the barrels and implementation, but you may want to think of some kind of subsidy and consider in the longer run, that our ability to harvest and save rainwater will save us millions, if not billions of dollars."

### 3.19.4 Amateur radio operators

Although radio operators were not mentioned in the Q&A sheets, two responses were received on behalf of the Otago Branch of the New Zealand Association of Radio Transmitters. Comments related to ensuring the activities of radio operators were not restricted.

- Clarification is required to define where in the Plan amateur radio services fall. If the rules which are to regulate amateur radio configurations are those in the various zone sections of the proposed Plan, then the rules and standards controlling buildings would appear to apply to amateur radio aerials and antennas, and their supporting structures. The application of such standards without recognition of the requirements of the amateur radio services would be an egregious error.
- Amateur radio operators also play a pivotal role in times of emergency by providing communication options and should be provided for accordingly in the Plan.
- Amateurs object to the sometimes prohibitive, non-refundable application filing fees to obtain a permit to erect an antenna installation and those provisions in ordinances, which regulate antennas for purely aesthetic reasons. The amateurs contend that antenna installation is no more aesthetically displeasing than other objects that people keep on their property (eg, motor homes, trailers, solar collectors, gazebos etc).
- The 2GP should be amended to incorporate amateur radio antenna configurations as permitted uses which will reasonably accommodate the legitimate objectives and requirements of the amateur radio services. Amendments are needed to the proposed performance standards to become more accommodating to the amateur radio service, so providing for more effective long distance communications than the limitations of the proposed performance standards would otherwise allow. Such rules must:
  - Increase the amateur radio antenna and aerial Permitted Use supporting structure heights to 20m in the living zones, and 30m in the Rural Zone.
  - Allow surmounted whip and discone antennas above the mast heights.
  - Reduce the setback requirements to a minimum dimension of 1.5m on internal site boundaries, and 3m on road boundaries.
  - Allow setbacks less than 1.5m on internal site boundaries with consent of adjoining lot owners.
  - Allow penetrations of any daylight control recession planes.

## 4.0 Appendices

### 4.1 Appendix 1 – Public workshops

Location	Date	Number of attendees
Central City	6 August 2013	17
South Dunedin	7 August 2013	17
Port Chalmers	8 August 2013	12
Green Island	14 August 2013	15
Mosgiel	15 August 2013	12
Otago Peninsula	20 August 2013	14
Strath Taieri	21 August 2013	13
Dunedin North	22 August 2013	14
North Coast	27 August 2013	9
Hill Suburbs	28 August 2013	2
Central City	29 August 2013	20

## 4.2 Appendix 2 - List of respondents

1. A & T Molteno
2. Aileen Crawford
3. Alan Starrett
4. Allison Beck
5. Andrew Robertson
6. Andy Barratt
7. Anonymous 1 (name not provided)
8. Anonymous 2 (name not provided)
9. Blair Smith
10. Bob Wyber
11. Bronwen Thomas
12. Cameron Crawford
13. Caroline Davies
14. Chas Tanner
15. Christina Ergler
16. Christopher Hilder
17. Clare and John Pascoe
18. Cliff Seque (on behalf of the Otago Property Investors Association)
19. Craig Werner
20. Dale Benson
21. Darel Hall
22. David Chalmers
23. David Cooper (on behalf of Federated Farmers)
24. David McCaskill
25. David Mulder (on behalf of the Otago branch of the NZ Association of Radio Transmitters)
26. Derek Onley (on behalf of Blueskin Bay Watch)
27. Derek Onley, Geraldine Tate, and Rosemary Penwarden
28. Derryn and Rodger Fewtrell
29. Elizabeth Cotton
30. Eryn Makinson
31. Ethan Archer
32. Gerard Auckram
33. Gerard Collings (on behalf of Waikouaiti Coast Community Board)
34. Gordon Davidson
35. Graeme Bennett
36. Grant Miller
37. Hilary Allison
38. Ian Millington
39. Ian Stephenson
40. Jacky Tate
41. Jacob Edmond
42. Jamie Lyons (on behalf of Signature Property Ltd)
43. Jamie Pickford
44. Jan (last name not provided)
45. Jan Tucker (on behalf of the Chalmers Community Board)
46. Jeanette Spooner
47. Jenny Neilson
48. Jenny Winter (on behalf of Save The Otago Peninsula)
49. John Baker
50. John Brimble (on behalf of Sport Otago)

51. John Cocks (on behalf of Sustainable Dunedin City)
52. Joseph Cecchi
53. Josephine Regan
54. Judy Fisher
55. Judy Martins
56. Julie McMinn (on behalf of the Ministry of Education)
57. Juliet Jones (on behalf of Matarae Station Ltd and Tor Ridge Trust)
58. Karen Hanna
59. Katrina Roos (on behalf of Otago University Property Services Division)
60. Ken (last name not provided)
61. Kim Rapley (on behalf of Caliz Developments)
62. Kris Nicolau
63. Larry Nichvolodov
64. Laura McElhone
65. Lee Paterson
66. Lincoln Coe (on behalf of Port Otago Limited)
67. Liz & Maurie Angelo-Roxburgh
68. Louise Burnside
69. Mark Thom
70. Marie Grills
71. Michael Newman (on behalf of the Otago branch of the NZ Association of Radio Transmitters)
72. Michael Ovens
73. Michael Porter (on behalf of Meridian Mall)
74. Nicholas Beach (on behalf of Roslyn Fire Station Ltd)
75. Nicky Jackson
76. Nicola Reeves (on behalf of Otago Coastal Guardians Incorporated)
77. Norcombe Barker (on behalf of the Harbourside and Peninsula Preservation Group)
78. Our Food Network Dunedin
79. Pam Gardner
80. Patricia Priest
81. Paul Douglas
82. Peter Innes-Jones
83. Peter Mulvihill (on behalf of Pioneer Generation Ltd)
84. Philip Gilchrist
85. Purakaunui Environmental Group Incorporated
86. Ray Faigan
87. RG & R Cunninghame
88. Robin Hyndman (on behalf of the Dunedin Amenities Society)
89. Roger Oakley
90. Rosemary Dixon (on behalf of Contact Energy/Rockgas Ltd)
91. Rosemary McQueen
92. Ross Price
93. Sam & Christine Neill
94. Sarah Mooney
95. Scott Willis (on behalf of Blueskin Resilient Communities Trust)
96. Simon Ryan
97. Suzanne Speer (on behalf of the NZ Racing Board)
98. Taieri Community Wellbeing Strategy Group
99. Ted Palmer
100. Tom Scott (on behalf of the Southern District Health Board)
101. Tony MacColl
102. Trevor Baines

### 4.3 Appendix 3 – Stakeholder workshops

Stakeholder group	Date
Port Otago Limited	16 May 2013
Public Health South	17 May 2013
Community Resilience Forum	19 June 2013
Preferred Options key stakeholder presentation	13 August 2013
Otago University Students Association (OUSA)	05 September 2013
North End Property Developers	05 September 2013
Queen Street Heritage Precinct	18 September 2013
Local Food Network	19 September 2013
Chamber of Commerce	23 September 2013
Mosgiel Social Wellbeing Group	24 September 2013
Ministry of Education	24 September 2013
Transforming Dunedin	25 September 2013
Mornington Mens Probus	08 October 2013
Edinburgh Realty	18 November 2013

## 4.4 Appendix 4 – 2GP Reference group meetings

Reference group	Date
Surveyors	17 April 2013
Rural	02 May 2013
Surveyors	29 May 2013
New Zealand Heritage Places Trust	17 June 2013
Surveyors	26 June 2013
Heritage Building Owners	3 July 2013
Designers	4 July 2013
Developers	5 July 2013
Heritage Building Owners	10 July 2013
Heritage Building Owners	08 August 2013
Natural Environment	11 September 2013
Surveyors	16 September 2013
Developers	20 September 2013
Designers	23 September 2013
Natural Environment	10 October 2013
Rural	14 October 2013
Designers	07 November 2013
Natural Environment	21 November 2013
Surveyors	25 November 2013
Developers	05 December 2013
Retail and Commercial	09 December 2013
Rural	09 December 2013