



SECOND GENERATION DISTRICT PLAN

Variation 2 – Additional Housing Capacity

Section 32 Report

February 2021

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LIST OF ABBREVIATIONS

2GP	Second Generation Dunedin City District Plan
Act	Resource Management Act 1991
ASBV	Area of Significant Biodiversity Value
CBD	Central Business District Zone
CMU	Commercial and Mixed Use Zones
DCC	Dunedin City Council
DI Airport	Dunedin International Airport
FDS	Future Development Strategy
GR1	General Residential 1 Zone
GR2	General Residential 2 Zone
HETZ	Harbourside Edge Transition Overlay Zone
ICMA	Infrastructure Constraint Mapped Area
ICR	Inner City Residential Zone
IndTZ	Industrial Transition Overlay Zone
LGA	Local Government Act 2002
NC	Non-complying
NCC	Natural Coastal Character Overlay Zone
NDMA	New Development Mapped Area
NECC	Neighbourhood Convenience Centre Zone
NEDC	Neighbourhood Destination Centre Zone
NES	National Environmental Standard
NPS-UD	National Policy Statement on Urban Development 2020
NPS-UDC 2016	National Policy Statement on Urban Development Capacity 2016
P	Permitted
Plan	Second Generation Dunedin City District Plan
Rec	Recreation Zone
RC	Rural Centre Zone
RD	Restricted Discretionary
RMA	Resource Management Act 1991
RPS	Otago Regional Policy Statement
RTZ	Residential Transition Overlay Zone
S32	Section 32 of the RMA
SWMP	Stormwater Management Plan

T&S	Township and Settlement Zone
The Spatial Plan	Dunedin Towards 2050: A Spatial Plan for Dunedin
UBMA	Urban Biodiversity Mapped Area
VA	Visitor Accommodation
WCMA	Wastewater Constraint Mapped Area

1 INTRODUCTION

1. This report provides a summary of the evaluation undertaken by Dunedin City Council (DCC) of proposed changes included in Variation 2 to the Second Generation Dunedin City District Plan (2GP). This assessment is required by Section 32 (s32) of the Resource Management Act 1991 (RMA).
2. A variation is a set of proposed amendments to a proposed plan before it is made fully operative. Under Clause 16A of Schedule 1 of the RMA 1991 a local authority may initiate variations to provisions in a proposed plan at any time before the approval of the plan. Variation 2 is the second variation to the 2GP; the first (Variation 1, notified in 2019) addressed minor errors and omissions which could not be addressed under Clause 16. The changes made under Variation 1 are now operative.
3. Variation 2 is being proposed primarily to give effect to the requirements of the National Policy Statement on Urban Development 2020 (NPS-UD). Under Section 55(2B) of the RMA, a local authority must make amendments to a proposed plan to give effect to provisions within a national policy statement. These amendments must be undertaken using the process in Schedule 1 of the RMA. Analysis and monitoring required by the NPS-UD has identified that Dunedin has a shortfall in housing capacity over the short, medium and long terms. Variation 2 addresses the requirement to provide sufficient development capacity for the short and medium term (up to 10 years). Development capacity for the longer term is not required to be included within a district plan and will be addressed through other means.
4. Variation 2 addresses the shortfall in housing over the short and medium term by zoning more land for housing (adding new residential areas, known as 'greenfield' development, through new General Residential 1, Township and Settlement and Large Lot Residential 1 zoning), enabling a higher density of housing in parts of the city through new General Residential 2 zoning, and changing rules and policies to allow increased development density and flexibility of development in many residential areas of the city.
5. Additional housing capacity for greenfield land is also expected to be achieved through resolution of residential zoning appeals on the 2GP. These are currently in a pre-mediation phase, which is running concurrently with the Variation 2 development process. Variation 2 does not, with a small number of exceptions, include land that is already the subject of an appeal to rezone it to a residential zone.
6. Variation 2 also responds to wider housing-related issues in Dunedin, including those addressed in the Mayor's Taskforce for Housing 2019 report, *Housing Action Plan for Dunedin 2019-2039*¹. The Action Plan includes sixteen recommendations to address the city's housing needs into the future. One recommendation is particularly relevant to this proposal: developing tools to ensure new developments help meet Dunedin's social and affordable housing needs (Action 2.4). Variation 2 responds to this Action by enabling

¹ Housing Action Plan for Dunedin 2019-2039 (Dunedin City Council and Community Housing Solutions, April 2019)

medium density social housing in most areas where standard density residential zones apply (General Residential 1 and some Township and Settlement zoned areas).

7. In addition, Variation 2 makes changes to several other 2GP housing related provisions. These include:
 - a. Changes to ensure that the subdivision of large areas of greenfield residential land is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated yet flexible way;
 - b. Changes to the Residential Transition Overlay Zone provisions;
 - c. Clarification of the policies relating to 3 waters infrastructure and changes to assessment rules to better implement those policies; and
 - d. Other changes to clarify provisions, correct errors, implement the NPS-UD or improve plan usability.
8. This report outlines relevant background information, including the planning and strategic framework for decision making. It identifies the purpose of each proposed change and evaluates each change against identified alternatives.

2 SCOPE OF CHANGES PROPOSED

9. Variation 2 is not a full plan review, but a focussed suite of changes to enable additional housing capacity through specific rule and policy changes and through rezoning specific sites. A full review of all the residential zone provisions and residential zoning across the entire city was not undertaken as this was recently done through the development of the Second Generation Dunedin City District Plan (2GP). The 2GP is still in the appeal phase and re-opening large parts of the plan to a new variation will slow the progress towards making the plan fully operative. Until the 2GP is operative, parts of the 2006 District Plan continue to apply along with the 2GP provisions, which increases the complexity and costs of processing consents. The changes proposed in Variation 2 are therefore as focussed as possible, and scope has been deliberately limited to avoid re-consideration of a wide range of provisions.
10. The scope of each proposal is identified in the 'purpose of proposal and scope of change' section for each proposed change. Submissions may be made on matters encompassed by these scope statements. Submissions are encouraged to improve and fine-tune the changes proposed, or to suggest alternative methods of achieving the purpose of the proposal, so long as these suggestions are within the limits of the scope statement.
11. For each change, a limited number of alternatives has been considered. In some cases, the only alternative considered is the status quo. This reflects the narrow scope of these proposed changes, which has naturally limited the number of reasonably practicable alternatives.

3 THE NEED FOR ADDITIONAL HOUSING CAPACITY

12. The National Policy Statement for Urban Development 2020 (NPS-UD) sets out requirements relating to planning for growth and development in urban environments, including for the provision of sufficient development capacity for anticipated residential growth. The objectives of the National Policy Statement on Urban Development 2020 (NPS-UD) are outlined in Section 5 below.
13. The NPS-UD came into force in August 2020, building on and replacing the National Policy Statement for Urban Development Capacity 2016 (NPS-UDC 2016). As required under the NPS-UDC 2016, a housing capacity assessment was completed in early 2019. This indicated a shortfall in housing capacity over the medium and long term of approximately 1,000 and 4,600 dwellings respectively². Since then, several factors have changed, including:
 - a. Market conditions (particularly a significant increase in land values and house prices)
 - b. Development has occurred, reducing the remaining development capacity
 - c. The NPS-UD has replaced the NPS-UDC 2016, with different requirements around assessing development capacity

² See the **Housing Capacity Assessment Dunedin City** (January 2019): https://www.dunedin.govt.nz/_data/assets/pdf_file/0010/704962/Housing-capacity-assessment-for-Dunedin-City.pdf

- d. Improvements to the residential capacity modelling
 - e. New population projections
 - f. Additional information on the types of housing preferred by Dunedin's residents; and
 - g. The impacts of Covid-19.
14. As a result, new demand and capacity figures have been calculated. These indicate a shortfall in housing over the short term (230 dwellings), medium term (1,640 dwellings) and long term (4,830 dwellings).
 15. Consideration of the preferences of Dunedin's population for different housing types, particularly standalone housing and attached housing (duplexes, townhouses and apartments), indicates that the shortfall of housing will be more marked for attached housing types. Variation 2 addresses this by enabling multi-unit development in a wider area of the city (through new General Residential 2 zoning), allowing duplexes through General Residential 1 and some Township and Settlement zones, and removing the restrictions on the occupancy of family flats.
 16. The assessment of housing demand, capacity and housing preferences is discussed in more detail below.

3.1 Population growth

17. In 2019 DCC commissioned an updated set of growth projections³. The updated set is based on Statistics New Zealand's 2017 projections and incorporates further datasets and analysis. A key assumption behind the updated growth projections was that Dunedin's growth would lie between the medium and high growth scenarios between 2018 and 2028, falling back to the medium growth scenario for the remainder of the projected timeframe. This follows the recommendations for Dunedin by Statistics New Zealand⁴.
18. As the projections were developed shortly prior to the Covid-19 pandemic, consultants (Infometrics) were commissioned to assess the likely impact of the pandemic on the population and dwelling projections⁵. While the assessment suggested that there is likely to be a significant economic impact from Covid-19, it concluded that the impact on population and dwelling growth is likely to be relatively minor and short-lived. As such, the pre-Covid growth projections have been retained by DCC as draft significant forecasting assumptions for the 2021-31 10 Year Plan.
19. The new projections suggest population growth of 916 people and 488 households per year between 2018-23, gradually decreasing to a plateau around 2038 (Figure 1). There is a medium-high degree of uncertainty in the projections due to the unknown impacts of Covid-19 in the short-term and inherent difficulty in projecting growth into the medium and long-term.

³ Growth projections review (Russell Jones, 2020)

⁴ 2013-base subnational population projections update: Advice to users (December 2019), Statistics New Zealand

⁵ Dunedin City Growth projections, Infometrics (June 2020)

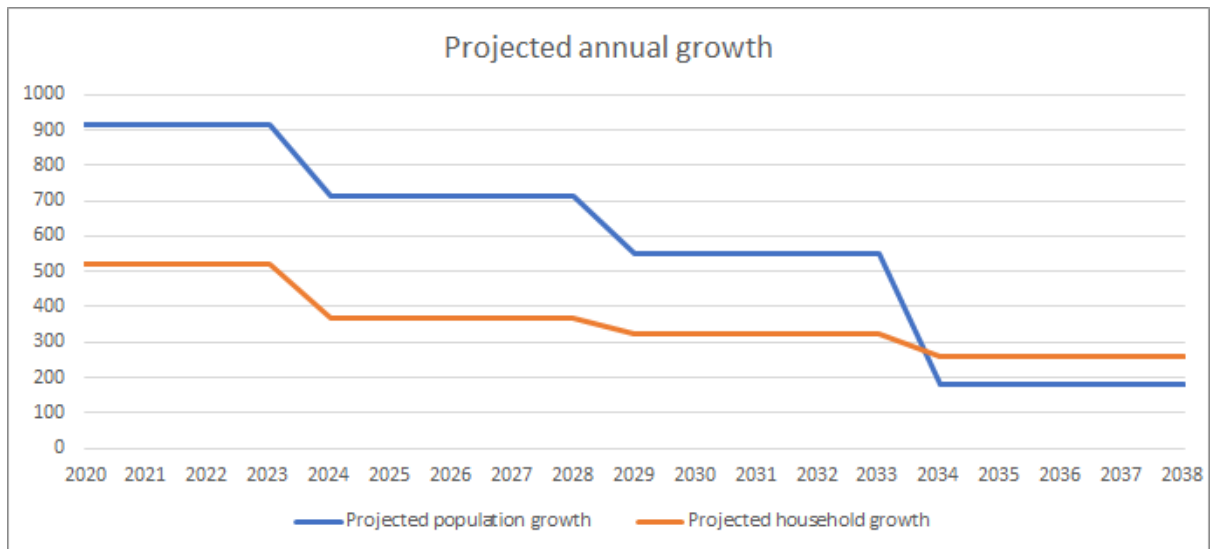


Figure 1: Growth projections

20. The updated 2019 projections significantly exceed previous projections on which the Second Generation Dunedin City District Plan (2GP), 2018 10 Year Plan, and 2019 Housing Capacity Assessment were based.
21. Dunedin's net population growth is expected to be almost entirely within the 65+ age group (Figure 2). There is a low-medium degree of uncertainty about the changes within this age group. The aging of the existing population is comparatively easy to forecast compared to migration, which typically impacts significantly on growth in younger age groups.

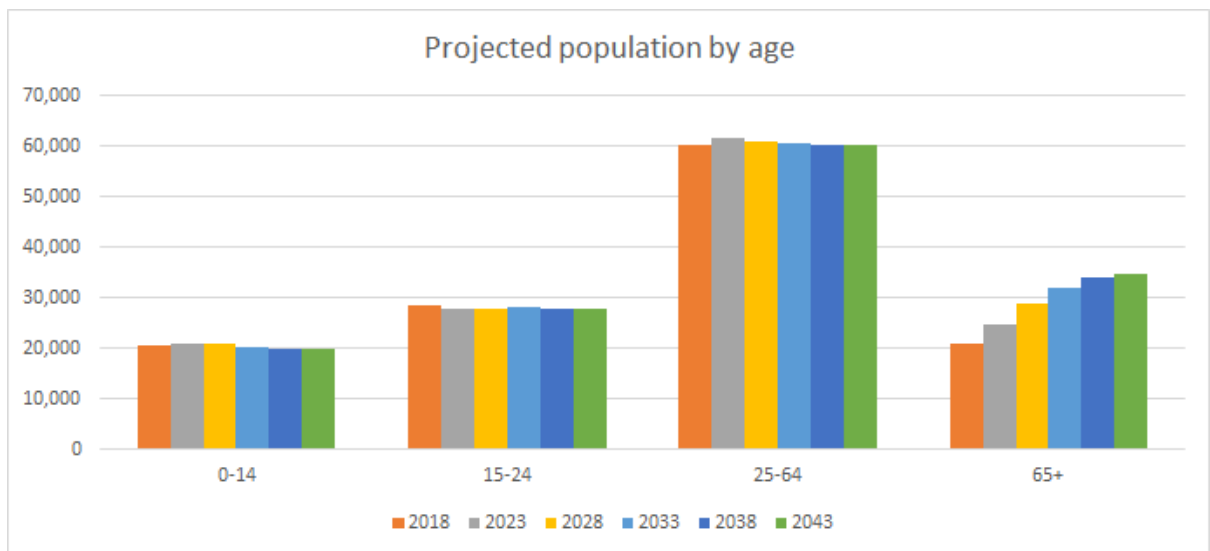


Figure 2: Projected population by age

22. Due largely to the ageing population, Dunedin's population growth is expected to be concentrated in one and two-person households (Figure 3). This is likely to result in a strong future demand for attached units, driven by the housing preferences of these groups (discussed below).

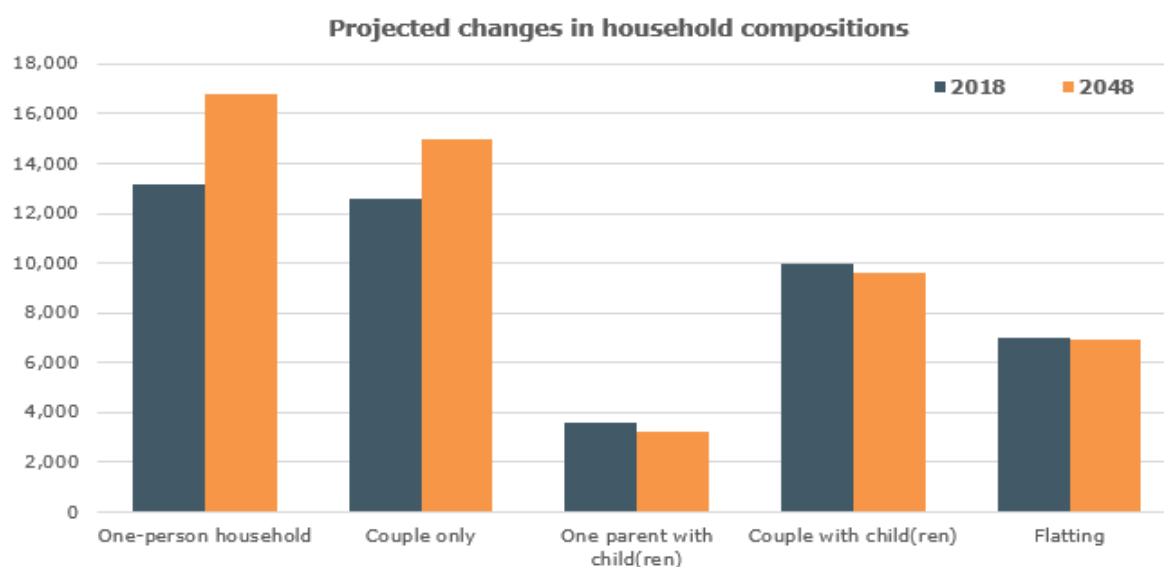


Figure 3: Projected household growth by type

3.2 Housing preferences

3.2.1 'Dunedin Housing We'd Choose' Survey 2019

23. Research into the housing preferences of Dunedin's residents was undertaken in 2019⁶. This study 'Dunedin Housing We'd Choose' surveyed 770 Dunedin residents, with the aim of estimating the level of demand for different types of dwellings in different locations.
24. The survey asked a range of questions around respondents' current housing, what they looked for when purchasing a dwelling, financial status, place of work, and where they would choose to live. Based on the affordability profile calculated by the survey, the respondents were then presented with different housing options, from which they could choose their preferred house type, size, and location.
25. The study divided the city into six 'catchments': inner city (Central Business District Zone (CBD) and adjoining commercial zones), inner suburbs, outer suburbs, South Dunedin, Mosgiel and outer areas (Figure 4). For this report, South Dunedin has been incorporated into the inner suburbs due to its small size relative to the other catchments.
26. The findings from the survey, along with population structures and projections, were used to develop a housing choice model to predict volume and location of future growth in Dunedin.

⁶ Dunedin City Council Housing Framework Predictions: The Housing We'd Choose (Research First, December 2019)

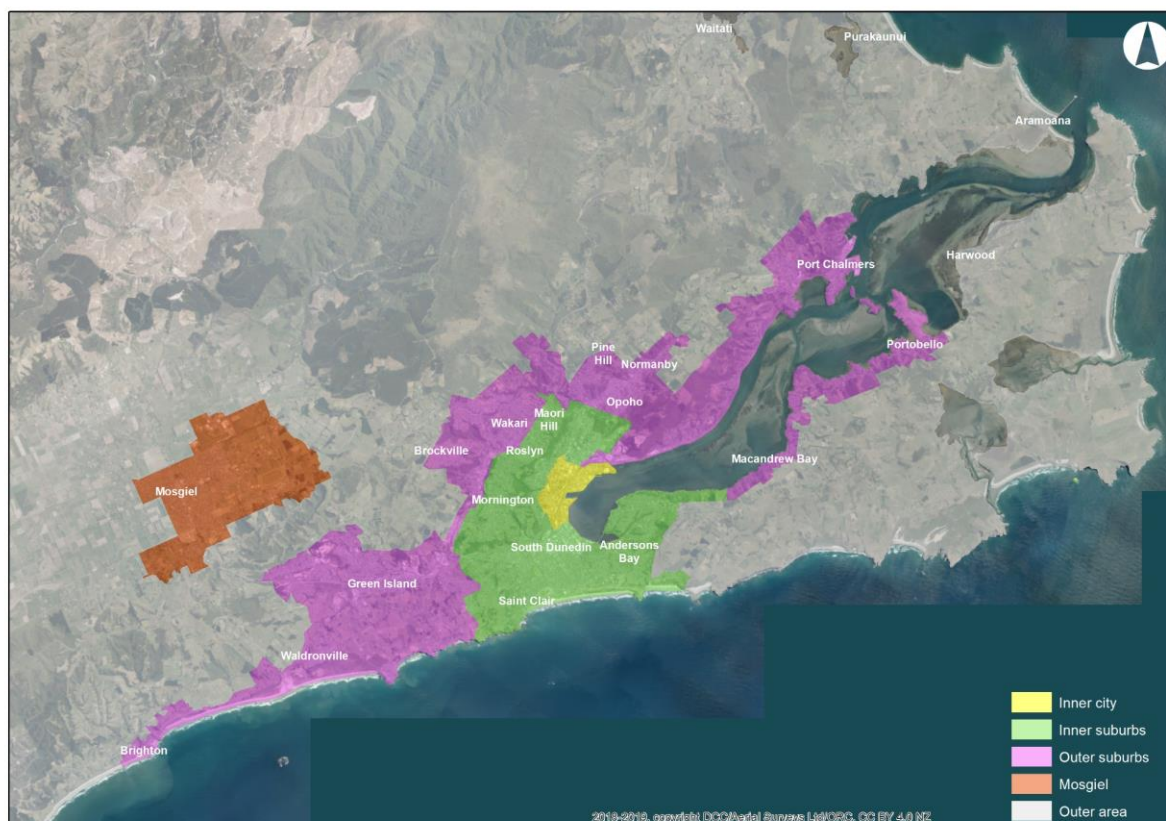


Figure 4: Housing catchments

27. The survey results showed that there is a preference for standalone housing, particularly for younger couples and households with children. However, over 40% of couples aged 65+, and people of all ages living alone, would choose to live in an attached housing typology (e.g. duplexes, townhouses and apartments) (Table 1). As these are the demographic groups that are projected to increase (see Figure 3 above), this has a significant impact on demand for this type of housing.

Table 1: Housing preferences by typology

Preferred housing typology	One person households (<65 years)	One person households (65+ years)	Couple without children (<65 years)	Couple without children (65+ years)	Parent(s) or caregiver(s) with children	Other multi-person household	All households
Standalone	56%	57%	84%	57%	83%	76%	75%
Attached	44%	43%	16%	43%	17%	24%	25%

28. A comparison of preferred housing with Dunedin's existing housing stock shows that there is an existing discrepancy between preferred housing types and housing supply, even before considering future growth and demographic trends. There are 5,250 more standalone

houses and 6,500 fewer attached homes than are needed to align with the preferences of Dunedin's current population.

29. The Housing We'd Choose study also revealed the preferred home locations of respondents (Table 2). This showed a strong preference for inner suburbs (located close to the CBD) and outer suburbs. However, there is significant variation between household types. Of the household types expected to grow (see Figure 3 above), one person households aged 65+ are more likely to want to live in the inner city (compared to the general population) and couples aged 65+ without children are comparatively more likely to prefer South Dunedin or Mosgiel.

Table 2: Housing preferences by location

Preferred location	One person households (<65 years)	One person households (65+ years)	Couple without children (<65 years)	Couple without children (65+ years)	Parent(s) or caregiver(s) with children	Other multi-person household	All households
Inner city	12%	12%	1%	4%	4%	6%	5%
Inner suburbs	44%	38%	33%	39%	35%	45%	37%
Outer suburbs	36%	26%	34%	18%	37%	31%	34%
Mosgiel	6%	21%	21%	29%	11%	12%	14%
Outer area	2%	2%	10%	11%	13%	6%	10%
Total	100%	100%	100%	100%	100%	100%	100%

3.2.2 'Planning for Housing Survey' 2019

30. A second, more informal, survey of people's views on housing types and locations was conducted by the Dunedin City Council in October 2019⁷. This consultation, the Planning for Housing Survey, provided the wider community with an opportunity to share their views on the provision of housing capacity in Dunedin, to inform changes to the 2GP and development of wider, housing-related strategic policy. This survey was self-selected, so is not statistically representative, and was part of the community consultation to develop Variation 2, that also included discussions with key stakeholders. It used an online questionnaire that included questions about which areas of the city should be rezoned to residential to provide for the development of new houses (greenfield development) and where more homes, such as apartments and townhouses, could be built in existing urban areas (intensification).
31. There was a total of 252 respondents to the survey. Support for some form of intensification to provide for growth was strong (42% preferred an emphasis on intensification and 41%

⁷ Planning for Housing Survey Report, Dunedin City, February 2020

preferred and even split between greenfield rezoning and intensification – 83% of responses overall). Relatively few respondents preferred an emphasis on greenfield rezoning (10%).

32. Intensification was considered by respondents to be most appropriate in the inner city, inner suburbs (from Maryhill to Maori Hill), and suburbs in the north of the city (North Dunedin, North East Valley and the Pine Hill area). Intensification was considered least appropriate in the Town Belt green space, Halfway Bush and areas subject to natural hazards. Intensification was both supported and opposed in South Dunedin, Otago Peninsula, Mosgiel and areas with heritage buildings.
33. Greenfield development (rezoning to residential) adjacent to the main urban area of Dunedin, especially areas closest to the central city, was generally supported. Areas attracting both support and opposition included the Mosgiel/Taieri area, Halfway Bush and the Otago Peninsula. Greenfield development was generally opposed in areas of productive rural land, natural hazards, green space and natural landscapes.

3.3 Housing demand

34. The updated population projections and housing preferences analysis have been combined (along with other data) to determine the most likely scenario for housing demand over the medium and long term. This is shown in
35. Table 3 and Table 4 below. These also incorporate an existing shortfall of 743 dwellings caused by the number of homes built over the last five years not keeping pace with projected demand over the same period and include the market efficiency buffers of 15-20% required by the NPS-UD.

Table 3: Projected total demand and capacity required

Timeframe	Demand for dwellings ⁸	Capacity required ⁹
Short-term (2020-23)	1,516	1,819
Medium-term (2020-30)	4,437	5,325
Long-term (2020-50)	9,101	10,688

36. Of total net household growth over the next 30 years, 97% is considered likely to be from one or two person households. As a result of this demographic shift (together with changing housing preferences), there is expected to be a strong future demand for attached units (Table 4).

⁸ Incorporating the existing shortfall of 743 dwellings

⁹ Incorporating the market efficiency buffers of 15-20%, as required by the NPS-UD.

Table 4: Projected dwelling capacity required by housing type

	2020-23	2020-30	2020-50
Standalone house	1,144	3,261	6,680
Attached units	674	2,064	4,008
<i>Total</i>	1,819	5,325	10,688

37. Demand by location is focussed on the inner suburbs, outer suburbs, and Mosgiel (Table 5).

Table 5: Projected dwelling capacity required by location

Catchment	2020-23	2023-30	2030-50
Inner city	136	415	768
Inner suburbs	744	2,210	4,272
Outer suburbs	473	1,325	2,626
Mosgiel	365	1,110	2,271
Outer area	101	264	752
<i>Total</i>	1,819	5,325	10,688

3.4 Existing housing capacity

38. An updated assessment of housing capacity has been undertaken in accordance with the requirements of the NPS-UD.
39. As shown in Table 6, this assessment shows that, under the existing planning framework, there is insufficient development capacity over the short, medium and long terms. Dunedin City Council are currently in mediation on a range of appeals seeking residential zoning. The settlement of these appeals could add feasible development capacity for up to 1,000 dwellings, all of which are likely to be taken up over the next ten years. All the capacity that may be added through settlement of appeals would be for greenfield development.

Table 6: Sufficiency of housing capacity

	Short-term (2020-23)	Medium-term (2020-2030)	Long-term (2020-50)
Capacity required ¹⁰	1,818	5,325	10,688
Capacity currently provided	1,591	3,684	5,760
Shortfall	-227	-1,640	-4,928

¹⁰ Incorporating existing shortfall of 743 dwellings, as well as a 20% buffer over 2020-30 and 15% over 2030-2050, as required by the NPS-UD 2020

40. The existing shortfall in capacity (compared to demand) is most pronounced for attached housing (Table 7).

Table 7: Relative capacity for attached and standalone housing

	Short-term (2020-23)		Medium-term (2020-30)		Long-term (2020-50)	
	Demand	Supply	Demand	Supply	Demand	Supply
Standalone housing	1,144	1,352	3,261	3,190	6,680	4,629
Attached housing	674	240	2,064	494	4,008	1,131

41. Geographically, the shortfall in development capacity is most pronounced in the inner city and inner suburbs (Table 8).

Table 8: Sufficiency by catchment

Catchment	Short-term (2020-23)		Medium-term (2020-30)		Long-term (2020-50)	
	Demand	Supply	Demand	Supply	Demand	Supply
Inner city	136	11	415	27	768	27
Inner suburbs	744	360	2,210	883	4,272	883
Outer suburbs	473	572	1,325	1,336	2,626	1,336
Mosgiel	365	520	1,110	1,093	2,271	1,093
Outer area	101	125	264	346	752	346

42. As shown in Figure 5, if population growth occurs faster than projected under the medium-high growth scenario, the identified housing capacity shortfall will be exacerbated. The impact would be greater on standalone housing, assuming the relative demand for housing types remains the same.
43. If population growth followed the low growth projection, then there would not be a shortfall of standalone housing; however, the supply of attached dwelling capacity would still be insufficient to meet demand.

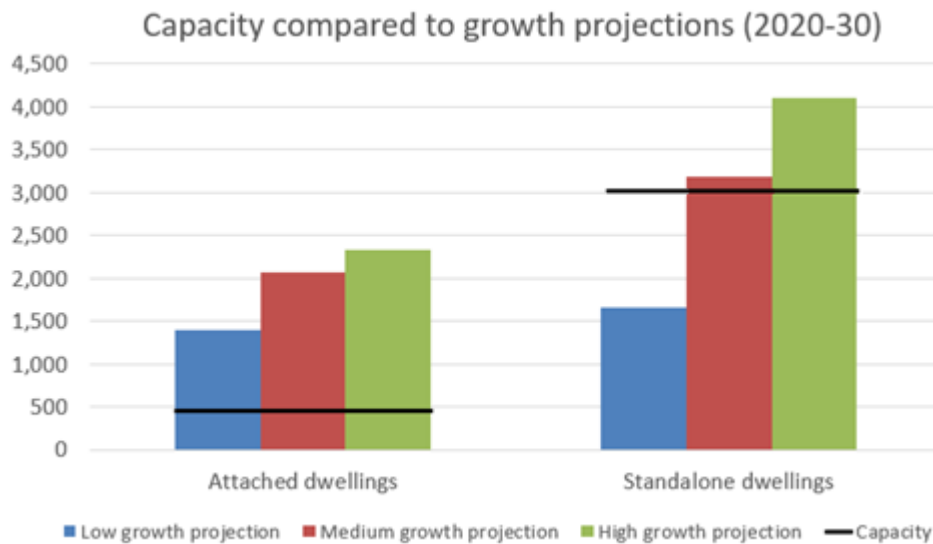


Figure 5: Capacity compared to growth projections

44. In conclusion, based on the most likely population projections and housing preferences research, additional housing capacity is required over the short, medium and long term, and a significant increase in the number of attached housing types is needed. The greatest need is likely to be in the inner suburbs.

4 CURRENT 3 WATERS ISSUES

45. One of the key constraints to providing additional housing capacity through the Second Generation Dunedin City District Plan (2GP) was capacity constraints within the 3 waters (stormwater, wastewater and water supply) infrastructure networks across much of the city. Many of the same constraints continue to present a barrier to urban growth and intensification.
46. Work is progressing to resolve the capacity constraints, with some upgrades already undertaken or programmed. However, the remaining network issues are significant and will require substantial investment and infrastructure works programmes into the long term. Funding is also being sought for additional projects through the DCC's 10 Year Plan 2021-2031 process to assist in resolving these issues.
47. New development needs to be carefully managed to ensure that effects on 3 waters networks are acceptable. New approaches are being considered through Variation 2 to ensure that additional housing development can take place while managing 3 waters effects, as outlined below. This is supported by a report entitled *3 Waters Strategic Direction Position Paper* (December 2020) by AR & Associates (see Variation 2 supporting documents).

4.1 Wastewater

48. There are existing wastewater network capacity issues across many parts of the city. These are caused or exacerbated by inflow and infiltration of stormwater and groundwater into the wastewater network during wet weather events. This already results in overflows of untreated wastewater into waterways, streets and private property in some locations. New development has the potential to exacerbate these issues and must be carefully managed.
49. Wastewater catchments that are particularly problematic include the Kaikorai Valley to South Dunedin catchment (limiting further development in Brockville, for example), North-East Valley catchment, and Mosgiel catchment.
50. High level modelling work has been undertaken to assess the extent of upgrades required across the city, based on development currently enabled under the 2GP and the potential increase in development necessary to provide for Dunedin's growth. As a result of this, funding is being sought for upgrades through the 10 Year Plan, and further work is identified in the DCC's infrastructure strategy.
51. In the meantime, the use of communal on-site wastewater detention tanks has been considered through Variation 2 in certain circumstances to enable some urban growth to occur while ensuring there are no additional adverse effects on the wastewater network until constraints can be resolved.

4.2 Water supply

52. There are also constraints in the water supply network in parts of the city, resulting in low water pressure and insufficient fire flows, particularly in summer. Areas affected include Mosgiel, the Otago Peninsula and northern settlements serviced by the Northern Pipeline (such as Waitati). These issues can be managed to some extent with water restrictions.

Funding is being sought through the 10 Year Plan for upgrades to parts of the water network.

4.3 Stormwater

53. Dunedin's stormwater network is made up of infrastructure such as pipes, culverts and natural open watercourses. This can include drainage channels, kerb and channel, natural features such as streams, green infrastructure such as constructed wetlands, and identified overland flow paths such as roads and parks. Parts of the network are in DCC ownership and parts in private ownership.
54. Stormwater is typically diverted and discharged to whichever downstream stormwater infrastructure is closest to a development. This may be DCC stormwater infrastructure such as kerb and channel, or into a private watercourse. Stormwater may flow through a combination of these private and public networks prior to being discharged to a stream or the coast. Therefore, the performance of both private and public stormwater infrastructure is critical to ensure flooding risk is appropriately managed.
55. In recent years, heavy rain events have exposed vulnerable sections of Dunedin's stormwater infrastructure. Failures have occurred as a result of inappropriate pipe sizing, outdated construction materials and inadequate installation techniques. Private watercourses and infrastructure on private land may no longer have capacity to carry increased flows (which can result from development in the upstream catchment) or may have inadequately designed secondary flow paths. This can increase the risk of adverse effects on public health, property and the environment from flooding. DCC has a responsibility to ensure the potential stormwater effects of development on downstream properties is managed
56. Key areas where there are currently issues managing the volume of stormwater generated are Mosgiel, Outram and South Dunedin.
57. In addition to flooding, there are potential impacts on water quality and erosion of watercourses and downstream properties if stormwater discharges are not adequately managed. Stormwater quality is currently an issue throughout the city, but is particularly problematic in Kaikorai Valley, Waitati, Otago Peninsula, and Tomahawk. The DCC has a duty to manage the quality of water it discharges from its network and this needs to be considered as a part of growth planning.
58. DCC stormwater models do not cover the full city and the capacity of parts of the network, particularly privately owned drains and channels, is not known. In the absence of full information, a precautionary approach is generally taken to stormwater management from new development, and attenuation of peak flows required so that post development flows do not exceed pre-development flows.
59. Methods to strengthen the management of stormwater effects are being considered through Variation 2, including requirements for on-site attenuation of stormwater in large areas of greenfield residential zoning. This will enable some urban growth to occur while appropriately managing stormwater.

5 PLANNING BACKGROUND

- 60. Under s75 of the RMA a District Plan must give effect to any national policy statements, New Zealand coastal policy statement, national planning standards and any regional policy statements, and not be inconsistent with a water conservation order or regional plan.
- 61. There are also several plans or strategies developed by DCC, including those required under the Local Government Act 2002 (LGA), that have informed the development of the changes included in Variation 2.
- 62. The key RMA and LGA documents of relevance to Variation 2 are summarised briefly below.

5.1 National Policy Statement on Urban Development 2020 (NPS-UD)

- 63. The NPS-UD classifies urban areas into different tiers relating to population size and projected growth rates, with Dunedin being classified as a Tier 2 urban environment (medium growth).
- 64. The Tier 2 classification obliges the DCC to give effect to all objectives in the NPS-UD along with selected policies. Objective 1 of the NPS-UD seeks to achieve well-functioning urban environments that enable all people and communities to provide for their social, economic and cultural wellbeing and for their health and safety. This objective is supported by seven other objectives focusing on:
 - a. housing affordability (Objective 2)
 - b. enabling more people to live in areas with many employment opportunities, good public transport services (existing or planned), and/or where there is high demand for housing (Objective 3)
 - c. the adaptability of New Zealand's urban environment to diversity and changing needs (Objective 4)
 - d. the need to take into account the principles of the Treaty of Waitangi/Te Tiriti o Waitangi (Objective 5)
 - e. ensuring strategic and responsive decision making on urban development, and integrating this with infrastructure planning and funding decisions (Objective 6)
 - f. the need for local authorities to have robust and frequently updated information about their urban environments, to inform planning decisions (Objective 7)
 - g. the need for urban environments to support a reduction in greenhouse gas emissions and to be resilient to the future effects of climate change (Objective 8).
- 65. Several policies apply to Dunedin as a Tier 2 city and cover a range of requirements to implement the objectives. Of these, six policies are relevant to what the variation is seeking to achieve:
 - a. Policy 1 requires that planning decisions contribute to well-functioning urban environments. The clauses in the policy outline a set of minimum requirements which urban environments must meet, including:

- i. having or enabling a variety of homes to meet the needs of different households for a variety of types, prices and locations, and enabling Māori to express cultural traditions and norms (clauses a i and ii);
 - ii. having good accessibility for people, including by way of public or active transport (clause c);
 - iii. supporting competitive operation of land and development markets (clause d);
 - iv. supporting reductions in greenhouse gas emissions (clause e); and
 - v. being resilient to effects of climate change (clause f).
- 66. Policy 2 requires that local authorities have at least sufficient development capacity to meet expected demand for housing and business land over the short, medium and long terms.
- 67. Policy 5 relates to intensification and requires that district plans enable a height and density of urban development that corresponds with the level of accessibility to public or active transport to commercial services, or the relative demand for housing and business use in that location (whichever is greater).
- 68. Policy 6 requires decision makers to have particular regard to a number of considerations, including the planned urban built form anticipated by planning documents (clause a); that changes to an area may change amenity values but that this is not, in itself, an adverse effect (clause b); the benefits of urban development consistent with well-functioning urban environments (clause c); contributions that will be made to meeting the requirements of the NPS to provide or realise development capacity (clause d); and the likely effects of climate change (clause e).
- 69. Policy 9 sets out requirements for local authorities to take into account the principles of the Treaty of Waitangi, including iwi and hapū involvement in RMA planning, and to take into account the values and aspirations of hapū and iwi for urban development.
- 70. Policy 10 requires that local authorities work together where they share jurisdiction over urban environments to implement the NPS-UD, that they engage with infrastructure providers to achieve integrated land use and infrastructure planning, and with the development sector to identify significant opportunities for urban development.

5.2 Otago Regional Policy Statement

- 71. The Partially Operative Otago Regional Policy Statement (RPS) includes several objectives which are relevant to urban development. The most directly relevant to the purpose of Variation 2 is Objective 4.5 relating to urban growth and development.
- 72. Objective 4.5 is:

Urban growth and development is well designed, occurs in a strategic and coordinated way, and integrates effectively with adjoining urban and rural environments.
- 73. This is implemented through policies 4.5.1-6, with Policy 4.5.1 being the most relevant.

Policy 4.5.1: Providing for urban growth and development

Provide for urban growth and development in a strategic and co-ordinated way, including by:

- a) ensuring future urban growth areas are in accordance with any future development strategy for that district.*
- b) monitoring supply and demand of residential, commercial and industrial zoned land;*
- c) ensuring that there is sufficient housing and business land development capacity available in Otago;*
- d) setting minimum targets for sufficient, feasible capacity for housing in high growth urban areas in Schedule 6*
- e) Coordinating the development and the extension of urban areas with infrastructure development programmes, to provide infrastructure in an efficient and effective way.*
- f) Having particular regard to:*
 - i. Providing for rural production activities by minimising adverse effects on significant soils and activities which sustain food production;*
 - ii. Minimising competing demands for natural resources;*
 - iii. Maintaining high and outstanding natural character in the coastal environment; outstanding natural features, landscapes, and seascapes; and areas of significant indigenous vegetation and significant habitats of indigenous fauna;*
 - iv. Maintaining important cultural or historic heritage values;*
 - v. Avoiding land with significant risk from natural hazards;*
- g) Ensuring efficient use of land;*
- h) Restricting urban growth and development to areas that avoid reverse sensitivity effects unless those effects can be adequately managed;*
- i) Requiring the use of low or no emission heating systems where ambient air quality is:*
 - i. Below standards for human health; or*
 - ii. Vulnerable to degradation given the local climatic and geographical context;*
- j) Consolidating existing coastal settlements and coastal urban areas where this will contribute to avoiding or mitigating sprawling or sporadic patterns of settlement and urban growth.*

74. Policy 4.5.2 - Integrating infrastructure with land use - is also relevant and relates to achieving the strategic integration of infrastructure with land use by recognising and providing for the functional needs of infrastructure, locating and designing infrastructure to take into account long term change, co-dependence with other infrastructure, effects on natural and physical values and the constraints of these resources on infrastructure, as well as the effects of climate change and natural hazard risk.

75. Policy 4.5.3 Urban design requires that new urban development is designed with regard to a number of matters:

- a. A resilient, safe and healthy community;
- b. A built form that relates well to its surrounding environment;
- c. Reducing risk from natural hazards;
- d. Good access and connectivity within and between communities;

- e. A sense of cohesion and recognition of community values;
 - f. Recognition and celebration of physical and cultural identity, and the historic heritage values
 - g. of a place;
 - h. Areas where people can live, work and play;
 - i. A diverse range of housing, commercial, industrial and service activities;
 - j. A diverse range of social and cultural opportunities.
76. It is noted that the RPS is currently subject to review and a new RPS is likely to be notified prior to decisions being made on Variation 2.

5.3 Dunedin City's Long Term Plan and Infrastructure Strategy

77. Under the NPS-UD requirement for sufficient development capacity for housing (Part 3 Subpart 1 *Providing development capacity*), development capacity must be infrastructure-ready. This means that in the medium term (between 3 and 10 years) either the infrastructure is in place or there is funding identified for adequate infrastructure in the long term plan. For the long term (between 10 and 30 years), this means that there is funding identified for adequate infrastructure in the long term plan or infrastructure strategy.
78. Local authority long term plans are required under the LGA and include the allocation of financial budgets for infrastructure upgrades and expansion over a ten-year period. Dunedin's current Long Term Plan, the *10 Year Plan 2018-28*, includes some major capital projects for development of infrastructure, including an upgrade of the Green Island Wastewater Treatment Plan, stormwater improvements in South Dunedin and transport improvements. A new draft *10 Year Plan 2021-2031* is currently being developed and will include additional funding for infrastructure to support growth.
79. Infrastructure strategies are required under the LGA to set the direction for local authority three-waters and transport planning for at least the next 30 years. Dunedin City Council's 2018 infrastructure strategy takes into account the separate 3 Waters Strategy (2010-2060) and Integrated Transport Strategy (2013-2043) and identifies the significant infrastructure issues for Dunedin.

5.4 Dunedin City Spatial Plan

80. *Dunedin Towards 2050: A Spatial Plan for Dunedin 2012* ('the Spatial Plan') sets a strategic direction for Dunedin's growth and development for 30+ years to guide land-use planning and infrastructure servicing. It contains objectives and policies to achieve its six strategic directions, which support of the vision of Dunedin as 'one of the world's great small cities'. It contains an urban form objective to achieve a 'compact city with resilient townships', including by urban consolidation and the prioritisation of the use of existing capacity in urban areas prior to expanding urban limits. The Spatial Plan does not identify geographical areas in which it is anticipated that Dunedin will grow.

81. The Spatial Plan, which was published in September 2012, is due for review and will need to meet the requirements of preparation of a Future Development Strategy (FDS) under the NPS-UD. The next FDS will need to be prepared jointly with the Otago Regional Council. The NPS-UD outlines the purpose of an FDS as promoting long term strategic planning by setting out how a local authority intends to achieve well-functioning urban environments and provide sufficient development capacity over the next 30 years. It also assists in the integration of planning decisions with infrastructure planning and funding decisions. The FDS must spatially identify broad locations that will provide development capacity, along with identifying the location of development, additional infrastructure needed to service that capacity, and any constraints on development. Initial background work on the FDS has started but the project will be formally initiated early in 2021.

5.5 Dunedin City Second Generation District Plan ('the Plan')

82. Many objectives and policies throughout the Plan are relevant to decisions on providing housing capacity and managing the effects on housing development on the environment. The key provisions are outlined below, with full wording of relevant provisions included in Appendix 1.

5.5.1 Sufficient housing capacity

83. The key strategic objective relevant to ensuring there is sufficient housing capacity is Objective 2.6.2. This is:

Dunedin provides sufficient, feasible, development capacity (as intensification opportunities and zoned urban land) in the most appropriate locations to meet the demand over the medium term (up to 10 years) while sustainably managing urban expansion in a way that maintains a compact city with resilient townships as outlined in Objective 2.2.4 and policies 2.2.4.1 to 2.2.4.3.

84. The key policy implementing Objective 2.6.2 in terms of identifying areas suitable for residential zoning is Policy 2.6.2.1. This policy includes reference to a number of relevant objectives that must be considered when residential zoning decisions are made. These include objectives relating to a compact city, efficient provision of infrastructure, maintaining significant natural values such as landscape, coastal character and biodiversity, and consideration of natural hazards. In some cases, policies under these objectives assist in determining how they should be applied in zoning decisions.
85. Policy 2.6.2.3 outlines the criteria for zoning land to a medium density zoning (General Residential 1 or Inner City Residential). It first requires alignment with Policy 2.6.2.1 and then lists additional considerations for development at a medium density, including referencing relevant objectives.

5.5.2 Housing choice

86. Objective 2.6.1 and Policy 2.6.1.1 relate to housing choice. Objective 2.6.1 is:

There is a range of housing choices in Dunedin that provides for the community's needs and supports social well-being.

87. Policy 2.6.1.1 is:

Provide for housing development necessary to meet the future housing needs of Dunedin, through zones and rules that provide for an appropriate mix of development opportunities, including: infill development, redevelopment, and greenfield development; and that support Objective 2.2.4. Identify housing needs based on population projections and analysis of housing types required.

5.5.3 Urban form

88. Objective 2.2.4 is:

Dunedin stays a compact and accessible city with resilient townships based on sustainably managed urban expansion. Urban expansion only occurs if required and in the most appropriate form and locations.

89. Policy 2.2.4.1 outlines that land should be used efficiently, and residential zoning should be at the highest appropriate density (medium density or standard density), with less dense zoning (i.e. large lot zoning or use of a structure plan to require a lower density) used only when environmental factors prevent development at a higher density.

5.5.4 Infrastructure planning

90. Objective 2.7.1 and Policy 2.7.1.1 are concerned with ensuring the efficient and cost effective provision and operation of public infrastructure networks. Objective 2.7.1 is:

Public infrastructure networks operate efficiently and effectively and have the least possible long term cost burden on the public.

91. Policy 2.7.1.1, as it relates to zoning decisions, is:

Manage the location of new housing to ensure efficient use and provision of public infrastructure through:

- a. ...;*
- b. consideration of public infrastructure capacity as part of zoning and rules that enable intensification of housing;*
- c. consideration of public infrastructure capacity as part of the identification of transition overlay zones, assessment of changes to zoning, or assessment of any greenfield subdivision proposals;*
- d. ...*
- e. ...*

6 SECTION 32 STATUTORY CONSIDERATIONS

92. Under Section 32 of the Resource Management Act 1991 (RMA) 'Requirements for preparing and publishing evaluation reports', the Dunedin City Council is required to undertake an evaluation prior to the notification of Variation 2.
93. Under Section 32(1), this evaluation must:
- (a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*
 - (b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—*
 - (i) identifying other reasonably practicable options for achieving the objectives; and*
 - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
 - (iii) summarising the reasons for deciding on the provisions; and*
 - (c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*
94. Under Section 32(2), the evaluation must also:
- (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects*
that are anticipated from the implementation of the provisions, including the opportunities for—
 - (i) economic growth that are anticipated to be provided or reduced; and*
 - (ii) employment that are anticipated to be provided or reduced; and*
 - (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and*
 - (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*
95. Under Section 32(6), 'objectives' means:
- a. For a proposal that contains or states objectives, those objectives;*
 - b. For all other proposals, the purpose of the proposal.*
96. This report assesses whether the objectives of this proposal are the most appropriate to achieve the purpose of the Act and whether the provisions are the most appropriate to achieve the objectives.
97. It is noted that the variation contains only three new or amended objectives which are assessed in terms of their appropriateness to achieve the purpose of the Act in the relevant sections below.
98. All proposals in the variation also have a purpose statement which also meets the meaning of 'objective' in accordance with Section 32(6). Each purpose is intended to assist in more

appropriately achieving the relevant existing objectives of the Plan. These existing objectives have been considered appropriate to achieve the purpose of the Act through the decisions already made on the Plan. Therefore, it is considered that the purpose (or 'objective') of each proposal will also appropriately achieve the purpose of the Act.

7 CONSULTATION UNDERTAKEN

99. Consultation has been undertaken with a variety of interested parties, to identify issues and constraints in the Second Generation Dunedin City District Plan (2GP) housing provisions, potential changes to rules and policies to increase housing capacity, potential areas suitable for rezoning and issues associated with those areas, impacts on values of significance to Manawhenua, and the ability to provide infrastructure services to new residential areas. Parties consulted included:

- a. Kati Huirapa Rūnaka ki Puketeraki and Te Rūnanga o Ōtākou;
- b. Otago Regional Council;
- c. Local developers, surveyors and planners;
- d. Infrastructure providers;
- e. Kāinga Ora;
- f. Affected landowners; and
- g. The general public, through the Planning for Housing Survey (see Section 3.2.2 above).

8 CHANGES TO MINIMUM SITE SIZE, DENSITY & FAMILY FLATS STANDARDS

8.1 Summary and overall purpose of proposal and scope of change

100. This proposal includes Changes A2, A3, B1, B3, B4, B6, E9 and the purpose of the proposal is to review the minimum site size (Rule 15.7.4) and density (Rule 15.5.2) performance standards for the General Residential 1 and Township and Settlement (serviced)¹¹ zones to provide for more housing development capacity and housing choice within these zones, where appropriate. The purpose extends to making any consequential changes to Plan rules necessary to manage any adverse effects of increased density if existing rules are deemed inadequate to ensure the proposal is the most appropriate way to achieve the objectives of the Plan.
101. A second and related proposal (Change A1) is to review the family flats provisions in Rule 15.5.2 and Rule 15.5.14 (which apply in all residential zones other than General Residential 2 Zone (GR2) and Inner City Residential Zone (ICR)). The scope of the proposal does not extend to reviewing the family flat provisions in other non-residential zones including Rural Residential and Rural zones as these provisions are subject to, or potentially overlap with, matters being considered in appeals on the Second Generation Dunedin City District Plan (2GP).
102. The density and minimum site size performance standards for the GR2 and ICR zones do not form part of this review or variation, other than to the extent that general changes are applied to these performance standards for all residential zones.
103. The changes proposed include major changes to add housing capacity, which are assessed in detail in the sections below, and minor changes which are assessed together in Table 12.

8.2 Relevant objectives

104. Section 32(1)(b) of the Act requires an assessment of whether the proposed provisions (policies and methods) are the most appropriate way to achieve the objective or purpose of the proposal. Section 32(3) also requires it to be assessed against the objectives of the 2GP. In this case the purpose of the proposal seeks to better achieve the relevant objectives of the 2GP, so the assessment has also focused on an evaluation against those objectives.
105. This assessment must:
 - a. identify other reasonably practicable options for achieving the objectives
 - b. assess the efficiency and effectiveness of the provisions in achieving the objectives, including consideration of the benefits and costs anticipated from the implementation of the provisions, and the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.
 - c. summarise the reasons for deciding on the provisions.

¹¹ 'Serviced' means not within the **no DCC reticulated wastewater mapped area**.

106. The key strategic objectives relevant to managing the density of residential activity and the minimum site sizes for residential subdivisions are Objective 2.6.1 on Housing choice, Objective 2.6.2 on Adequate urban land supply, Objective 2.7.1 on Efficient infrastructure, and Objective 2.4.1 on Form and structure of the environment.
107. These objectives are relevant because they seek to provide for the development of enough housing of a range of types and in a range of locations (objectives 2.6.1 and 2.6.2) while balancing the effects on public infrastructure (Objective 2.7.1) and on the aesthetics on the environment, including on residential character and amenity (Objective 2.4.1). The detail of each of these objectives is provided below.
108. Objective 2.6.1 is concerned with providing housing choice, and reads:
- There is a range of housing choices in Dunedin that provides for the community's needs and supports social well-being.*
109. Objective 2.6.2 ensures there is sufficient housing capacity and reads:
- Dunedin provides sufficient, feasible, development capacity (as intensification opportunities and zoned urban land) in the most appropriate locations to meet the demand over the medium term (up to 10 years), while sustainably managing urban expansion in a way that maintains a compact city with resilient townships as outlined in Objective 2.2.4 and policies 2.2.4.1 to 2.2.4.3.*
110. Objective 2.7.1 ensures there is efficient public infrastructure and reads:
- Public infrastructure networks operate efficiently and effectively and have the least possible long term cost burden on the public*
111. Objective 2.4.1 is concerned with form and structure of the environment and reads:
- The elements of the environment that contribute to residents' and visitors' aesthetic appreciation for and enjoyment of the city are protected and enhanced. These include:*
- a. important green and other open spaces, including green breaks between coastal settlements;*
 - b. trees that make a significant contribution to the visual landscape and history of neighbourhoods;*
 - c. built heritage, including nationally recognised built heritage;*
 - d. important visual landscapes and vistas;*
 - e. the amenity and aesthetic coherence of different environments; and*
 - f. the compact and accessible form of Dunedin.*
112. The proposed changes to the rules for residential density and minimum site size are assessed against these objectives later in this section.

8.3 Overall background and issues of concern

113. This section provides overall background to the density, minimum site size and family flats performance standards for residential activity to provide context for the rule changes proposed.

8.3.1 Density and minimum site size

114. All standard residential land use activity in a residential zone must meet the performance standard for density which is set out at Rule 15.5.2. Contravention of this density standard is a non-complying activity except in some circumstances where it is a restricted discretionary activity, for example for papakāika. Guidance on the assessment of consents is included in assessment Rule 15.13.5.1.
115. All general subdivision (which includes fee simple subdivision but not cross lease, company lease or unit title subdivision) in a residential zone must meet the performance standard for minimum site size, set out at Rule 15.7.4. Contravention of the minimum site size performance standard is also generally a non-complying activity, with guidance on the assessment of consents in assessment Rule 15.13.5.4.
116. The performance standards for density and minimum site size are generally aligned to provide consistency of requirements between land use and subdivision activities, and so are considered together in this section.
117. Table 9 shows the prevalence of each residential zone in the decisions-version of the 2GP and the range of densities and minimum site sizes provided for in each.

Table 9: Density and Minimum Site Size in the Residential Zones

Residential zone	% of Residential zoned properties	Maximum density for land use ¹²	Minimum site size for subdivision ¹³
Medium density zones (these provide for multi-unit development)			
Inner City Residential	6.5%	1 habitable room per 45m ² site area	200m ²
General Residential 2	20.3%	1 habitable room per 45m ² site area	300m ²
Standard density zones (these provide for 1 unit per site plus a family flat)			
General Residential 1	56.4%	1 residential unit per 500m ² site area	500m ²
Township & Settlement	15.1%	1 residential unit per 500m ² site area	500m ²
Low Density Residential	1%	1 residential unit per 750m ² site area	750m ²

¹² The presence of various mapped areas may act to decrease the maximum density in the GR2 and T&S zones, depending on location.

¹³ The presence of various mapped areas may act to increase the minimum site size in the GR2 and T&S Zones, depending on location.

Lower density zones (these provide for 1 unit per site plus a family flat)			
Large Lot Residential 1	0.5%	1 residential unit per 2000m ² site area	2000m ²
Large Lot Residential 2	0.2%	1 residential unit per 3500m ² site area	3500m ²

118. For the standard density residential zones, the density and minimum site sizes were not substantially changed through the 2GP. Of note, the General Residential 1 Zone and Township & Settlement Zone density and minimum site size provisions have remained largely unchanged at least since the Operative District Plan was notified in 1995. Where these zones have remained in place for some time, this has led to a predominance of sites sized between 500m² and 1000m² with a single dwelling on each.¹⁴

119. Table 10 shows the prevalence of the various ranges of site sizes in the General Residential 1 Zone (GR1), as calculated in mid-2019.

Table 10: Prevalence of various site sizes in the General Residential 1 Zone (mid-2019)

Site area	% of GR1 sites
0-500m ²	10.4%
500-800m ²	53.5%
800-1000m ²	16.2%
1000-2000m ²	14.0%
2000m ² +	5.9%

120. The minimum site size and density standards for the General Residential 1 Zone and Township & Settlement zones are being reviewed and changes proposed in order to test whether there is an opportunity to more appropriately achieve Objective 2.6.2 and Objective 2.6.1 through allowing increased development capacity while still achieving other objectives, including Objective 2.7.1 on Efficient infrastructure and Objective 2.4.1 on Form and structure of the environment.

121. This review is necessary due to the shortfall in housing capacity identified for the medium term, including for housing within the existing urban area (see Section 3). An alternative option to achieve a rebalancing of these objectives is to rezone further areas of General Residential 1 Zone to a medium density zone, and this has also been considered in the rezoning sections later in this report.

¹⁴ At the time of 2GP decisions, 87% of properties in the GR1 Zone had either a single unit or were vacant.

8.3.2 Family flats

122. Provisions enabling the development of family flats in all residential zones except the medium density zones (because multi-unit development is enabled in those zones) were added through the 2GP process. These provisions currently enable a second residential unit to be built on a site where certain criteria are met.
123. The criteria for the use of family flats include controls on the tenancy of the units (requiring the occupant to be related to or dependent on the household in the primary residential unit on site – see Rule 15.5.14.1) and the design of the buildings (requiring a maximum floor area of 60m² and shared service connections with the primary residential unit on site– see Rule 15.5.14.2). A height limit to ensure family flats are only a single storey is also applied in the performance standard for maximum height at Rule 15.6.6.2. Contravention of the tenancy rule defaults to a non-complying activity status, whereas the other requirements default to a restricted discretionary activity status.
124. Family flats are also provided for in the Rural and Rural Residential zones, but these are beyond the scope of Variation 2 to consider.
125. Since the decisions were released on the 2GP, the family flats provisions have been taken up in various locations across the city. However, the provisions regarding the tenancy of family flats could be amended to better enable take-up and the achievement of Objective 2.6.1: Housing choices. There is also a lingering issue regarding what happens to family flats when they are no longer occupied by someone who meets the criteria in the tenancy performance standard.
126. An issue has also been identified where large ‘family flats’ more akin to a primary residential unit have been proposed as a restricted discretionary activity. This has the potential to undermine the density performance standard and increases the risk that there will be pressure to subdivide these units off in the future in a way that was not anticipated by the 2GP. This issue needs to be rectified to ensure that Objective 2.7.1: Efficient public infrastructure and related objective 9.2.1 and Objective: 2.4.1: Form and structure of the environment and related objectives 15.2.3 and 15.2.4 are effectively achieved.

8.3.3 Housing development capacity provided by the status quo

127. As set out in Section 3, the status quo is not providing sufficient housing capacity to at least meet demand in the medium term (next 10 years), as required by the National Policy Statement on Urban Development 2020 (NPS-UD) and Plan Objective 2.6.2 on Adequate urban land supply.
128. Furthermore, the shortage of attached housing typologies is particularly acute, and there is a higher relative shortage of housing capacity in the inner residential areas of the City. These relative shortages are detracting from achieving Objective 2.6.1 on Housing choices.
129. Maintaining the status quo for the General Residential 1 and Township & Settlement (served) zones will effectively result in a need to provide a higher proportion of housing capacity through either rezoning areas to medium density zones, or through rezoning new greenfield residential land. It is noted that rezoning to medium density zones is being proposed in areas of the City where this can be supported due to the availability of public

infrastructure and higher degrees of accessibility to services and public transport (see the rezoning proposals later in this report). However, these medium density rezoning proposals will not be sufficient to meet the shortage in housing capacity alone.

130. Rezoning new greenfield residential land is also being considered as part of Variation 2, but if greater extents of greenfield land are required due to the status quo for General Residential 1 Zone (GR1) and Township and Settlement Zone (T&S) provisions being maintained, this will detract from achieving Objective 2.2.4 on Compact and accessible city, and related objectives which seek to protect rural amenity (Objective 2.4.6), productive land (Objective 2.3.1), promote energy resilience (Objective 2.2.2) and manage effects on the efficient operation of public infrastructure (Objective 2.7.1).
131. Maintaining the status quo would also detract from achieving Objective 2.2.2 on Environmental performance and energy resilience by not providing feasible opportunities for the redevelopment of older and energy inefficient housing stock.
132. While maintaining the status quo would ensure there are no additional adverse effects in terms of achieving Objective 2.4.1 on Form and structure of the environment (and related objectives 15.2.3 and 15.2.4) with respect to residential character and amenity, the status quo is not a practicable option given Dunedin's housing demand projections.

8.3.4 Overall assessment of the proposed rule changes

133. This section collectively assesses the major rule changes, being Change A1, Change A2 and Change A3. The minor changes are assessed separately in a later section of this report.
134. The major changes proposed are Change A1 to amend the family flats provisions, Change A2 to permit duplexes and two residential units within one residential building, and Change A3 to reduce the minimum site size from 500m² to 400m². Change A1 applies to all residential zones, while the other two changes will only apply to the General Residential 1 Zone and the Township & Settlement Zone except within the **no DCC reticulated wastewater mapped area**.
135. The assessment below considers these changes' appropriateness in terms of a range of relevant objectives where the assessment does not vary significantly between the changes. Individual assessments for each of the changes are also given after this section to cover matters specific to each change.

8.3.4.1 Assessment against Objective 2.6.2 – Adequate urban land supply

136. Capacity modelling undertaken in accordance with the NPS-UD has demonstrated that the reduction in minimum site size and the provision for duplexes will collectively enable an additional 1,510 residential units within the next 10 years. It is noted that this does not account for areas that may be rezoned to a medium density zone through Variation 2, or new greenfield zoning added through the resolution of appeals on the 2GP or through Variation 2.
137. Taken in isolation, the proposed changes to enable duplex developments are expected to enable an additional 1,210 new homes. The proposed change in minimum site size would enable an additional 950 homes. The difference between the figures for the individual

changes and the collective change across both Change A2 and Change A3 stated above is due to both options not being able to be taken up on a single site.

138. Modelling also shows that the development capacity that will be added through these changes will be distributed across the city. This will assist in meeting demand for housing in a range of appropriate locations, in accordance with Objective 2.6.2. Figure 6 below shows the spatial distribution of modelled additional housing capacity.

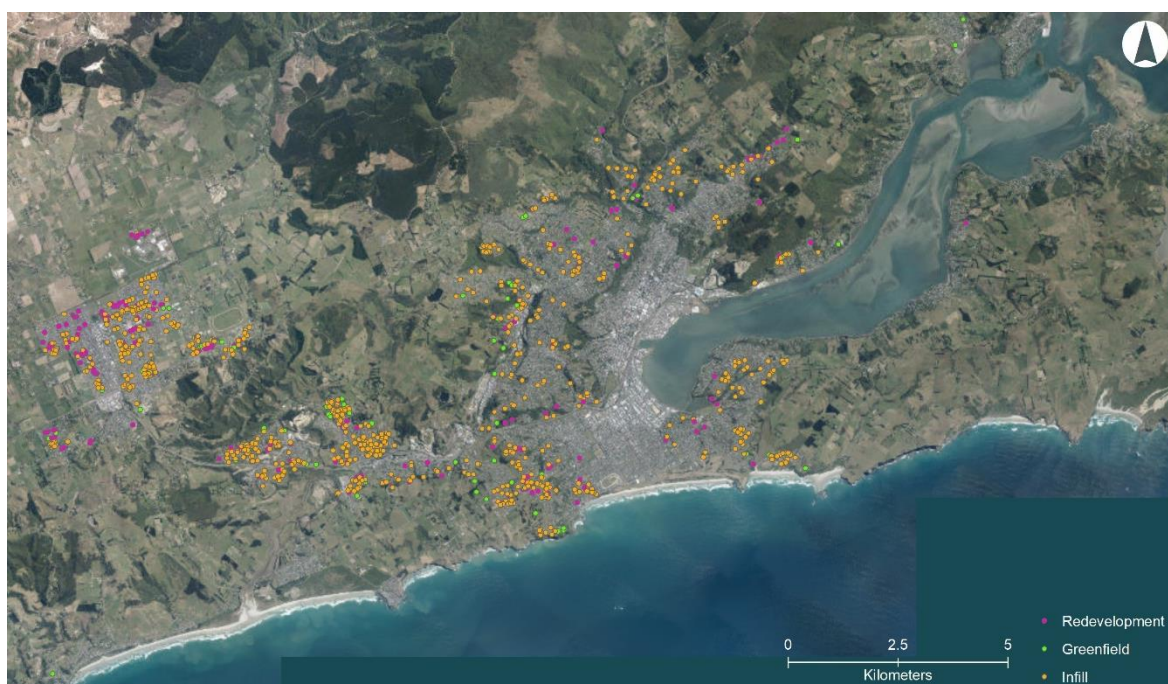


Figure 6: Distribution of housing development capacity modelled for rule changes

139. When considering housing development capacity shortfall by location, these changes are expected to contribute to resolving the shortfalls, as set out in Table 11.

Table 11: Distribution of projected additional housing capacity by urban catchment

Urban catchment ¹⁵	Current projected medium-term capacity surplus/shortfall	Medium-term capacity added by rule changes	Projected medium-term capacity surplus/shortfall with rule changes
Inner city	-389	0	-389
Inner suburbs	-1,326	+360	-966
Outer suburbs	+11	+699	+710
Mosgiel	-18	+444	+426
Outer urban area	+81	+12	+93
Total	-1,640	+1,514	-126

¹⁵ Urban catchment boundaries are shown in Figure 4 in Section 3 above.

140. It is noted that the changes proposed will add no capacity within the inner city catchment because this area does not contain any General Residential 1 Zone or Township & Settlement Zone. The impact of the rule changes in the Inner suburbs is partially restricted by a significant area of this catchment already being zoned with medium density zones.
141. Further capacity would also be added to some catchments through rezoning proposals which are discussed later in this report.
142. Overall, it is considered that the proposed changes will be effective in achieving Objective 2.6.2 by providing additional housing capacity in a range of appropriate locations to assist in resolving the projected shortfall.

8.3.4.2 *Assessment against Objective 2.6.1 – Housing Choice*

143. The proposed changes are anticipated to contribute to more effectively and efficiently achieving Objective 2.6.1, which seeks the provision of a range of housing choices to meet the community's needs and support social wellbeing.
144. As set out in Section 3, there is a greater relative shortage of smaller and attached housing typologies, based on the results of the 'Dunedin Housing We'd Choose' survey. In addition, the 'Planning for Housing Survey' showed community support for intensification within the existing urban area with 83% preferring either an emphasis on providing housing capacity through intensification or an even split between intensification and greenfield capacity¹⁶. There was also strong support for allowing the development of duplexes in the standard residential zones, with 61% agreeing these should be provided for (the most popular option)¹⁷.
145. By reducing the minimum site size, many sections sized between 800m² and 1000m² will now be able to be subdivided and developed with an additional new home. Homes on smaller sections tend to be smaller also, to ensure that the bulk and location performance standards can be met. This will assist in meeting the shortage of smaller homes.
146. Provision for duplexes and two residential units within a single residential building will also assist in the provision of smaller homes, expected to be typically two bedrooms in size, depending on the site size. Once duplexes are developed, fee simple subdivision will be enabled through the exemption to the minimum site size performance standard proposed under Change B6. This will encourage their development and result in section sizes as small as 250m².
147. Smaller land areas per residential unit as a result of both Change A2 and Change A3 will also reduce the contribution of land value to the overall cost of housing, meaning that the resulting houses will be more affordable than traditional housing types and sizes.

¹⁶ See Section 3.3 of the report **Planning for Housing Survey Report: Dunedin City February 2020** by Elisabeth Boyle and Emily McEwan.

¹⁷ See Section 3.2.3 of the above report.

8.3.4.3 **Assessment against Objective 2.7.1 – Infrastructure**

148. Mr Jared Oliver of DCC 3 Waters has undertaken an assessment of the proposed rule changes. A memo outlining his assessment can be found in Appendix 2. Mr Oliver has not raised any issues of concern that need to be specifically managed. He concludes that:

...the proposed rule changes are considered acceptable from a 3 Waters infrastructure perspective. They generally fall within the maximum possible development scenario that had originally been used for assessing 3 Waters infrastructure impacts...

149. As such, the infrastructure demand that is likely to be generated by the proposed rule changes will be able to be accommodated within the freeboard in 3 waters public infrastructure as a part of the planned upgrades to service growth around the city over the next ten years.
150. Potential effects on the affordability and efficiency of 3 waters infrastructure delivery are being managed by not applying the rule changes in areas that are in a **no DCC reticulated wastewater mapped area**. This will avoid the risk that demand for unplanned expansions to reticulated wastewater infrastructure will arise as a result of the rule changes.
151. Should issues arise with unanticipated levels of uptake of the rule changes and consequent effects on public infrastructure, a plan change to apply limits to further uptake could be considered as part of a monitoring response.

8.3.4.4 **Assessment against Objective 2.2.4 - Compact and Accessible City and Objective 2.2.2 - Environmental performance and energy resilience**

152. Providing for more people to live within the existing urban area will have the benefit of reducing the need to provide additional greenfield development land for housing. This will assist in better achieving Objective 2.2.4 on Compact and accessible city.
153. Encouraging more people into areas closer to the central city and other key areas for employment, education and services will also reduce reliance on motor vehicles through being more likely to provide for alternative travel modes and/or vehicle distances travelled for these trips and will assist in achieving Objective 2.2.2.

8.3.4.5 **Assessment against Objective 2.7.2 - Efficient transportation**

154. The proposed changes have the potential to generate effects on the transport network and may compromise the achievement of Objective 2.7.2 on Efficient Transportation. These effects would primarily arise from additional on-street parking demand where on-site parking is not provided for additional residential units.
155. The NPS-UD requires that DCC does not impose minimum carparking standards to manage these effects (Policy 11). However, there are a range of ways these effects could be managed. These include requiring consent to enable an assessment of effects on the safe and efficient operation of the transport network, but this would undermine the benefits of the change in terms of providing for housing capacity and choice.
156. A more appropriate approach is a review by DCC Transport of the Resident Only Parking scheme to ensure that resident parking is effectively managed around the city. Mr Simon

Spiers from DCC Transport has confirmed that a review of this scheme will be undertaken once all feedback from the 'draft parking roadmap' is received. This will support achieving Policy 11 of the NPS-UD and ensure parking effects are appropriately managed.

157. It is also anticipated that landowners will continue to choose to provide on-site parking to improve the functionality and market desirability of new dwellings in many cases.
158. Overall, any effects on street parking arising from the proposed rule changes will be able to be managed through parking management plans outside of the 2GP, and it is considered that Objective 2.7.2 will still be appropriately achieved.

8.3.4.6 *Assessment against Objective 2.4.1 – Form and structure of the environment*

159. Dr Andrea Farminer (DCC Heritage Planner) and Peter Christos (DCC Urban Designer) have assessed the potential impacts of the rule change options on the achievement of Objective 2.4.1, particularly whether “the amenity and aesthetic coherence of different environments” would be protected and enhanced. Their report is attached in Appendix 3 and discussed below with respect to the different changes.
160. Overall, the findings of the report are that the effects of intensification from the proposed rule changes will be moderate over time and there will be a moderate cumulative loss of gardens and greening over time.
161. Alternatives to manage effects on character and amenity are considered in later in Section 8.8 of this report.

8.3.4.7 *Assessment against Objective 2.2.1 – Natural hazards*

162. Whether the proposed rule changes have the potential to increase risk from natural hazards has been considered as part of this assessment. Overall, it is assessed that the existing methods in the 2GP managing ‘natural hazards sensitive activities’ (including residential activity) and development activities in hazard mapped areas are sufficient to manage any increased risk as a result of the proposed rule changes. Therefore, no additional measures to manage hazard risk have been proposed as part of this change.

8.3.4.8 *Assessment against Objective 2.2.3 – Indigenous biodiversity & Objective 10.2.1 – Biodiversity values*

163. Mr Richard Ewans (DCC Biodiversity Advisor) has provided some overall comments on the effects of intensification on biodiversity values (see Appendix 8), including the following:

...some areas outside UBMA's in General Residential 1 & 2 Zones retain small patches of indigenous vegetation, established exotic trees, and high-quality gardens which provide habitat for indigenous biodiversity. Intensification poses a direct risk to these values, which in many cases will also align with amenity and other values, by potentially exacerbating tree and habitat loss.¹⁸
164. Mr Ewans also gives the general advice that a change in density does not justify increased restrictions on vegetation clearance but does recommend further work be carried out to

¹⁸ See para. 9 of the memorandum **2GP Variation 2 Potential Rezoning sites – Biodiversity Comments** by Richard Ewans, 30 November 2020.

identify options for this. Some relevant options may correlate with options suggested for consideration by Dr Farminer and Mr Christos regarding effects on residential character. These are considered in greater detail in the assessment of Alternative A2-Alt3 in Section 8.8 below.

8.4 Change A2 – Duplexes and two units in a single building in the GR1 and T&S (serviced) zones

8.4.1 Proposed change and assessment

165. Change A2 amends the density performance standard to permit duplexes in the GR1 and T&S (serviced)¹⁹ zones on sites with a minimum site area of 500m². It also permits two residential units in one residential building, which will enable partitioning of an existing residential unit into two.
166. This includes the following changes:
 - a. Add a definition of Common Wall;
 - b. Add a definition of Duplex;
 - c. Amend Policy 2.6.1.2 regarding providing for housing suitable for one and two person households;
 - d. Amend 15.1.1.1 Zone description;
 - e. Amend Rule 15.5.2.1.a, (i) and (k) Density performance standard to permit two residential units per 500m² site area where they are in a single residential building or in the form of a duplex;
 - f. Amend Rule 15.5.2.2.c Density performance standard (consequential); and
 - g. Remove notes that define common wall (15.6.6A (part); 15.6.13A; 34.6.6.1A) because this is in the new definition.
167. An overall assessment of this change, including the additional housing capacity it creates individually and in combination with Change A3 reducing the minimum site size, is presented above in Section 8.3.4. In addition, the following assessment is specific to Change A2.

8.4.1.1 Assessment against Objective 2.4.1 – Form and structure of the environment

168. Dr Farminer and Mr Christos assessed the rule changes allowing duplexes on sites of 400m² or larger. They concluded in their report (see Appendix 3) that duplexes which are developed one behind the other when viewed from the street frontage (but not those developed side by side) have the potential to adversely affect the existing residential character and recommended consideration of the following controls²⁰:
 - a. *An option for duplex units to have a minimum frontage width to provide for a clear and distinguishable building entrance (to avoid the construction of 'sausage flats').*

¹⁹ 'serviced' means the Township & Settlement Zone is not within a **no DCC reticulated wastewater mapped area**.

²⁰ See Section 3.2.4 of the above report.

- b. *Design guidance required on duplex design to help mitigate any potential effects from being sited on a 'narrow' site (for example, a defined pedestrian entrance and minimum % of glazing facing the street, etc.).*

169. These recommendations have been considered but rejected for a range of reasons. These are set out in the assessment of Alternative A2-Alt3 in a separate section below.
170. A minimum site size of 500m² for the development of duplexes has been progressed for this change to manage the density of built form arising from the development of duplexes and assist in ensuring Objective 2.4.1 is effectively achieved.

8.5 Change A3 – Minimum Site Size & Minimum Site Area in GR1 and T&S (serviced) zones

8.5.1 Proposed change and assessment

171. Change A3 amends the minimum site size and density performance standards for the GR1 and T&S (serviced) zones by reducing minimum site size for subdivision and site area for a residential unit (other than a family flat) from 500m² to 400m².
172. Change A3 includes the following changes:
 - a. Amend 15.1.1.1 Zone description;
 - b. Amend Rule 15.5.2.1 Density to reduce the minimum site area for a residential unit from 500m² to 400m² for the General Residential 1 Zone and Township & Settlement Zone not within the **no DCC reticulated wastewater mapped area** so that this performance standard aligns with the changes made to minimum site size; and
 - c. Amend Rule 15.7.4.1 Minimum Site Size to similarly reduce the minimum site size for these zones, with a consequential reduction in the minimum site size for the General Residential 2 Zone within an **infrastructure constraint mapped area**, except Mosgiel so that it continues to be equal to that for the General Residential 1 Zone.
173. An overall assessment of this change, including the additional housing capacity it creates individually and in combination with Change A2 permitting duplexes, is presented above in Section 8.3.4. In addition, the following assessment is specific to Change A3.

8.5.1.1 Assessment against Objective 2.4.1 – Form and structure of the environment

174. For the reduction in minimum site size, Dr Farminer and Mr Christos concluded in their report (see Appendix 3) that the potential effects of intensification in the relevant zones will be moderate over time, that there will be a moderate cumulative loss of gardens and greening over time, and that the following controls should be considered to mitigate effects²¹:

²¹ See Section 3.1.4 of the report **Variation 2: General Residential Rule Change Assessment – Effects on Residential Character and Amenity** by Peter Christos and Andrea Farminer.

- a. *New dwellings should be located to the rear of existing dwellings on newly subdivided sections. Exceptions to this could be if the section frontage width exceeds its depth and the subdivision does not include demolition...*
 - b. Adding rules to require a resource consent for the removal of gardens that are identified as high quality, while permitting the removal of pest plant species.
175. These recommendations have been considered but rejected for a range of reasons. These are set out in the assessment of Alternative A2-Alt3 in Section 8.8 below.

8.6 Change A1 – Family flats provisions

8.6.1 Proposed change and assessment

176. Change A1 makes several changes to the provisions on family flats to expand when they can be used by:
- a. Removal of the restriction on tenancy (Rule 15.5.14.1) so they can be occupied by any person irrespective of their relationship with the occupants of the primary residential unit. There is a consequential name change to rename family flats to ‘ancillary residential units’ by way of a new definition and replacement of this term throughout the relevant provisions.
 - b. Amendment of the management of the size of family flats, which retains a 60m² size threshold before a consent for a restricted discretionary activity is triggered but adds an upper limit of 80m² to be considered an ‘ancillary’ residential unit (via the definition).
 - c. Deletion of all other aspects of the design requirements for family flats in Rule 15.5.14.2, other than the limit on height in Rule 15.6.6.2.
 - d. Related changes to the policies for family flats.
177. No changes are proposed for the equivalent provisions in the Rural Residential and Rural zones because the provision of housing in these zones is beyond the scope of Variation 2. Furthermore, the family flat provisions in the Rural zones are subject to overlap with the 2GP appeal process. It is intended that these provisions will instead be reviewed through a later variation or plan change once the provisions are settled for the Residential zones.
178. This change includes the following primary changes:
- a. Add a definition of ‘ancillary residential units’;
 - b. Amend Policy 15.2.4.3 to set the changed requirements for ancillary residential units;
 - c. Amend Rule 15.5.2.1.k.ii (density performance standard) to require the minimum site size performance standard to be met for an ancillary residential unit to be allowed;
 - d. Delete Rule 15.5.14.1 (family flats tenancy performance standard);
 - e. Amend Rule 15.5.14.2 (family flats design performance standard); and
 - f. Add Note 15.5.14A (to explain a new 80m² limit on ancillary residential units).

179. The consequential and minor changes required are:
- a. Change the term ‘family flats’ to ‘ancillary residential units’, or add the term ‘ancillary residential units’ throughout plan, except in the definition, Section 16 and 17;
 - b. Amend Policy 2.2.4.4 by deleting clause (d) because it duplicates the function of Policy 2.7.1.1 and Policy 15.2.4.3;
 - c. Amend Policy 2.6.1.2 to remove the reference to natural hazards, as this is an error from the decisions version;
 - d. Amend 15.1.1 residential zone descriptions to reference the change;
 - e. Amend Rule 15.13.5.1 (assessment of density contravention due to amending Policy 15.2.4.3);
 - f. Delete Rule 15.13.5.6 (assessment of deleted tenancy contravention); and
 - g. Amend Rule 15.10.3.4 (assessment of family flats design performance standard).
180. An overall assessment of this change is presented above as part of Section 8.2.5. In addition, the following assessment is specific to Change A1.

8.6.1.1 *Assessment against Objective 2.6.1 – Housing Choice*

181. The proposed changes to provisions for ancillary residential units in all residential zones, except the medium density zones (GR2 and ICR zones), will increase the opportunity for the development of smaller, and consequently more affordable, residential units throughout the city. This will provide benefits to participants in the residential rental market, particularly for small households, by improving the supply of rental housing options over time. It will also provide benefits to homeowners through the potential for an income stream from having a residential tenant to assist with covering mortgage and household costs and this will encourage the uptake of these provisions.
182. Overall, this change will improve how effectively Objective 2.6.1 is achieved.

8.6.1.2 *Assessment against Objective 2.6.2 – Adequate urban land supply*

183. The housing capacity assessment model for Dunedin City has previously not counted family flats as additional dwellings, as they did not meet the Statistics New Zealand definition (which is used to calculate demand and supply of dwellings). The changes to ancillary residential units will mean that some will meet the definition. However, due to the complexity involved in assessing likely uptake and the benefits of being conservative in calculating capacity, they have not been counted towards development capacity in the updated assessment for Variation 2. However, it is anticipated that the uptake in the use of these provisions will increase as a result of the changes proposed and Objective 2.6.2 will be better achieved through this.

8.6.1.3 *Assessment against Objective 2.4.1 – Form and structure of the environment*

184. Providing for additional ancillary residential units over what is currently allowed in the 2GP has the potential for impacts on existing residential amenity and character by the loss of some green space to new buildings and changes in streetscape amenity by the addition of small buildings in front of existing houses.

185. Dr Farminer and Mr Christos recommended in their report (see Appendix 3) that a requirement for new ancillary residential units to be located to the rear of an existing or new dwelling is considered to reduce the effects on streetscape character.
186. This recommendation has been considered but rejected for a range of reasons. These are set out in the assessment of Alternative A1-Alt1 in Section 8.8 below.

8.7 Minor changes

Table 12: Minor changes

Change ID	Summary of change	Amendments included	Assessment
B1 Minimum site size averaging	Amends the existing averaging provision in the minimum site size performance standard (Rule 15.7.4.2) so the number of sites that can be undersized will be unlimited provided the other conditions are met, rather than the current limit of one undersized site.	Amend 15.1.1.1 Zone descriptions; Amend Rule 15.7.4.2 Minimum Site Size averaging	This change will provide for greater flexibility in site sizes, rather than make any fundamental change to the number of sites provided for overall. In practice, this will result in some additional sites being developed which currently cannot be due to the lack of flexibility. However, this will not generate additional effects on public infrastructure or amenity compared to the maximum development potential technically provided for, which is used as the basis for rezoning assessments. Overall, the change will assist in achieving Objective 2.6.1 and Objective 2.6.2 while ensuring the other relevant objectives can still be achieved.
B3 Density and units on existing sites of any size	Amends the exemption to the density performance standard that allows a single residential unit to be erected on a site of any size (Rule 15.5.2.1.k) to remove the requirement for compliance with all other performance standards.	Amend Rule 15.5.2.1.k	This change will improve Plan efficiency by enabling each performance standard to stand alone in terms of identifying and assessing relevant contraventions, rather than tying these into the density performance standard for this exemption. The current approach effectively makes a contravention of any other performance standard also a non-complying density contravention. This will assist in achieving Objective 2.6.2 by reducing the likelihood of a non-complying density contravention for a single residential unit on a site of any size. At the same time, the other objectives will still be achieved through the implementation of all other performance standards.
B4 Counting of access legs towards	Amends the density performance standard so that access legs are included in the calculation of minimum site area ²² (Rule 15.5.2.2.b) and amends the minimum site size performance	Amend Rule 15.5.2.2.b;	The amendment to the density standard will remove the current issue with inconsistency with the minimum site size standard (which currently includes access legs in all cases). It will also ensure that road and access layout is designed in a way that better meets the objectives of the Plan by discouraging the use of multiple private accessways and cul-de-sacs to achieve access to rear sites as a means of maximising

²² Note this change does not affect the GR2 or ICR zones as these zones don't manage density via Minimum site area for a residential unit

Change ID	Summary of change	Amendments included	Assessment
minimum site area and minimum site size	standard so access legs are included in minimum site size for GR1 and T&S sites up to 1200m ² (except within the no DCC reticulated wastewater mapped area), and for all sized sites in other zones.	Amend Rule 15.7.4	the yield of sites from a subdivision area. It still allows the counting of access legs for small infill subdivisions where development of roads is unlikely to be necessary.
B6 Exemptions to minimum site size for existing development	Amends the minimum site size performance standard (Rule 15.7.4) to add an exemption where lawfully established residential buildings will be located on each resultant site to avoid triggering the need for non-complying consent for the fee simple subdivision of multi-units, duplexes, and existing residential buildings with established effects.	Amend Rule 15.7.4.1.j; Amend Rule 15.7.4.2	This change will improve Plan efficiency and subdivision outcomes by preventing the use of cross-lease subdivision as a means to avoid the application of the minimum site size performance standard where it would result in a non-complying contravention. The exemption is structured so that effects from the developments subject to subdivision can be considered separately (for example, by being lawfully established, or through restricted discretionary consent applications for multi-unit development). This will support the achievement of Objective 2.6.1 and Objective 2.6.2 by enabling subdivision where the effects of the development have already been considered acceptable to support the achievement of other relevant objectives.
E9 Clarification of density performance standard activity status (Rule 15.5.2.4)	Amends the density performance standard (Rule 15.5.2.4) to clarify when restricted discretionary activity status applies.	Amend Rule 15.5.2.4	This is a clarification to improve Plan interpretation and efficiency. As it is not a substantive change to the Plan and is considered to have no measurable effects, it has not been assessed under s32.

8.8 Alternatives assessed

187. This section sets out an assessment of alternatives to the major rule changes proposed for family flats (Change A1), duplexes (Change A2) and minimum site size (Change A3). Some of the alternatives considered could be pursued in addition to the proposed changes (for example, to manage the effects on residential character of the proposed changes), whereas others would be substitutes for the proposed changes if considered more appropriate.
188. It is noted that no reasonably practicable alternatives have been identified or assessed for the minor changes described in Section 8.7 above.
189. The alternatives assessed include the following four options:
 - a. Provide for two standalone residential units per site in the General Residential 1 and Township & Settlement (serviced) zones (Alternative A2-Alt1);
 - b. Move to a habitable room approach to density in the General Residential 1 and Township & Settlement (serviced) zones (Alternative A2-Alt2);
 - c. Add controls to manage character effects of infill housing in the General Residential 1 and Township & Settlement (serviced) zones (Alternative A2-Alt3); and
 - d. Add performance standards to manage the character effects of family flats in all residential zones where they are provided for (Alternative A1-Alt1).

8.8.1 Alternative A2-Alt1: Two standalone residential units per site in the GR1 and T&S (serviced) zones

190. Alternative A2-Alt1 is to provide for two standalone residential units per site in the General Residential 1 and Township & Settlement zones (not within the **no DCC reticulated wastewater mapped area**) either as a permitted activity or a restricted discretionary activity. If as a permitted activity, this would be the same as providing for ancillary residential units with no tenancy or design limitations.

8.8.1.1 *Assessment against Objective 2.6.2 – Adequate urban land supply*

191. This alternative would provide much greater benefits in terms of achieving Objective 2.6.2 on Adequate urban land supply compared to the preferred options. This is because it moves closer to effectively rezoning most of the standard density residential zoned areas around the City to the medium density General Residential 2 Zone.

8.8.1.2 *Assessment against Objective 2.2.4 – Compact and accessible city*

192. This alternative would also provide benefits arising from providing for further housing capacity within the existing urban area. This would reduce the need for greenfield urban expansion and encourage development in more accessible locations. This would support the achievement of Objective 2.2.4 on Compact and accessible city, and would also have benefits in terms of related objectives, including those which seek to protect rural amenity (Objective 2.4.6), productive land (Objective 2.3.1), and promote energy resilience (Objective 2.2.2).

8.8.1.3 *Assessment against Objective 2.7.1 – Efficient infrastructure*

193. The above benefits would also come with substantial costs in terms of achieving other objectives. Of note, the higher density of development provided for would lead to effects on 3 waters public infrastructure which cannot be supported. As noted in the Section 4 of this report, there are significant capacity constraints in the wastewater and stormwater networks around the city that will take some time to resolve. This alternative would exacerbate effects from existing system overflows which would be unacceptable and difficult to rectify in a timely manner. Overall, this would not enable Objective 2.7.1 on Efficient infrastructure (and related objective 9.2.1) and Objective 2.2.5 & amended Objective 2.2.2 on Environmental performance to be achieved.

8.8.1.4 *Assessment against Objective 2.4.1 – Form and structure of the environment*

194. There is also the potential for adverse effects on residential character and amenity that would detract from achieving Objective 2.4.1 on Form and structure of the environment (and related objectives 15.2.3 and 15.2.4).
195. It is noted that this option would provide for two standalone residential units, each up to 9m in height, on a site as small as 500m². This would generate different effects to the proposed options which provide for two standalone residential units on two sites, each of 400m² in size (800m² in total). The ancillary residential unit option (Change A1) and duplex option (Change A2) each provide for a form of two residential units per site. However, the effects are mitigated by controls on design, including floor area and height limits for ancillary residential units; a requirement for duplexes to be attached and on sites at least 500m² in size; and the requirement to comply with the habitable room measure for density for both these changes.
196. Dr Farminer and Mr Christos have considered this alternative in their report (see Section 3.3 of Appendix 3) and concluded that it is very unlikely that two stand-alone units could be constructed on a site of the minimum size while complying with the bulk and location performance standards. As such, this would manage some of the potential for effects on residential character. However, the report also identifies that there are risks from the concentration of smaller units on adjacent sections and from a greater loss of amenity space compared to the duplex option due to the less efficient use of the section space. Overall, Dr Farminer and Mr Christos prefer duplex development to two standalone residential units per site.
197. Overall, while providing for two residential units per site in the General Residential 1 and Township & Settlement (serviced) zones would provide for more housing capacity than the status quo or preferred options, this is outweighed by the adverse effects on 3 waters public infrastructure. Adverse effects on residential character and amenity also detract from this alternative. Overall, this alternative is not recommended as Objective 2.6.2 on Adequate urban land supply can be achieved by other methods that are more appropriate in terms of achieving the full range of relevant objectives.

8.8.2 Alternative A2-Alt2: Habitable room approach to density in the GR1 and T&S (serviced) zones

198. This alternative would change the approach to density in General Residential 1 and Township & Settlement (serviced) zones to a habitable room approach as is used for the medium density zones, rather than the current site area per residential unit approach. It could either keep the existing habitable room figures unchanged or increase them to a level suitable to manage effects on public infrastructure or other effects.

8.8.2.1 *Assessment of existing habitable room figures*

199. If the existing habitable room figures for these zones were kept unchanged and applied to all standard residential activity (and not just family flats, as is currently the case), this would effectively provide for a change to the General Residential 2 Zone provisions where an infrastructure constraint mapped area is applied.
200. This change would likely be even more effective in providing additional housing capacity than Alternative A2-Alt1 assessed above. Therefore, it would also achieve benefits in terms of achieving Objective 2.2.4 on Compact and accessible city and related objectives.
201. Similarly, it would result in even greater adverse effects on 3 waters public infrastructure, further detracting from achieving Objective 2.7.1 on Efficient transportation (and related Objective 9.2.1); and additional adverse effects in terms of achieving Objective 2.4.1 on Form and structure of the environment (and related objectives 15.2.3 and 15.2.4).
202. This density of development cannot be provided across the city and still achieve Objective 2.7.1 on Efficient public infrastructure and related objective 9.2.1. Instead, rezoning to General Residential 2 Zone in specific locations where public infrastructure capacity can support this is the approach preferred as part of Variation 2. Rezoning proposals are assessed in later sections of this report.

8.8.2.2 *Assessment of increased habitable room figures*

203. The potential for adverse effects from this option could be mitigated by increasing the habitable room figures for these zones to reduce the density of land use provided for. However, this would also impact the housing capacity that would be added. This approach could even result in reduced flexibility regarding house sizes provided for when a single standalone residential unit is to be developed on a site. For example, currently a single residential unit with any number of habitable rooms can be developed on a site (provided the bulk and location performance standards are met). Under the current habitable room figures, a single residential unit on a 500m² site could have up to five habitable rooms. This could be comprised of four bedrooms and a second principal living area. If the habitable room figures were increased to 1 habitable room per 120m², for example, this would only enable four habitable rooms on a 500m² site. This would adversely impact the achievement of Objective 2.6.1 on Housing choice for those who would like to develop a larger house.
204. Overall, this alternative is the least preferred option in terms of enabling the relevant objectives of the Plan to be achieved.

8.8.3 Alternative A2-Alt3: Controls for infill housing enabled by Change A2 & Change A3

205. Alternative A2-Alt3 could be pursued in combination with the preferred options for Change A2 and Change A3 outlined above. This alternative involves pursuing all the mitigation measures promoted for consideration by Dr Farminer and Mr Christos in their report on the effects on residential character of the proposed rule changes, as relevant to each change (see Appendix 3 and below).
206. As noted for the reduction in minimum site size (Change A3), Dr Farminer and Mr Christos concluded that the potential adverse effects of the change on residential character and amenity will be moderate over time, that there will be a moderate cumulative loss of gardens and greening over time, and that the following controls should be considered to mitigate effects²³:
- a. *New dwellings should be located to the rear of existing dwellings on newly subdivided sections. Exceptions to this could be if the section frontage width exceeds its depth and the subdivision does not include demolition.*
 - b. Adding rules to require a resource consent for the removal of gardens that are identified as high quality, while permitting the removal of pest plant species.
207. In addition, for the rule changes allowing duplexes (Change A2), Dr Farminer and Mr Christos concluded that duplexes which are developed one behind the other when viewed from the street frontage (but not those developed side by side) have the potential to adversely affect the existing residential character and recommended consideration of the following controls²⁴:
- a. *An option for duplex units to have a minimum frontage width to provide for a clear and distinguishable building entrance (to avoid the construction of 'sausage flats').*
 - b. *Design guidance required on duplex design to help mitigate any potential effects from being sited on a 'narrow' site (for example, a defined pedestrian entrance and minimum % of glazing facing the street, etc.).*
208. These recommendations have been considered and this alternative rejected for the following reasons:
- a. Requiring new dwellings to be located to the rear of existing dwellings may simply encourage the demolition of existing housing stock to enable compliance with the suggested control. Furthermore, once a subdivision has been completed, the resultant sites may be developed individually without reference to development that exists on other resultant sites;
 - b. Adding rules to manage the removal of 'high quality' gardens is considered problematic and might discourage people from maintaining a high-quality garden if it will affect the development potential of their site;
 - c. The design of the frontage of standalone residential dwellings, garages, or other buildings is not controlled in the Plan and sets a permitted baseline. Therefore,

²³ See Section 3.1.4 of the report **Variation 2: General Residential Rule Change Assessment – Effects on Residential Character and Amenity** by Peter Christos and Andrea Farminer.

²⁴ See Section 3.2.4 of the above report.

controlling the design of building frontages for duplexes only is inconsistent and will decrease the flexibility and increase the cost of complying with the proposed provisions;

- d. Placing additional controls on the design and location of new dwellings and duplexes may increase the cost of developing new housing, reduce the amount of feasible development capacity that will be realised as part of the rule changes and slow down the process of development;
 - e. The results from the Planning for Housing Survey²⁵ showed that public opinion regarding imposing additional design controls as part of providing for intensification was supported by 59% of respondents, but many of these people sought the use of design controls for reasons other than to manage effects on neighbourhood character (such as to manage on-site car parking or effects on the amenity of neighbours), which is not the intention of the proposed alternative;
 - f. Bulk and location performance standards must still be complied with and this is considered sufficient to manage the visual dominance of new buildings;
 - g. The NPS-UD provides direction to decision-makers that changes in amenity values are not, of themselves, an adverse effect and to consider the benefits of urban development (Policy 6), and these benefits are considered greater in this case; and
 - h. The NPS-UD also provides direction that the district plan enables heights and density of urban form commensurate with the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services or the relative demand for housing use in that location, whichever is greater (Policy 5). The NPS-UD gives no qualifying matters regarding this policy. However, advice from MfE is that the guidance on qualifying matters for Tier 1 urban environments should be used. This requires a high standard of evidence to demonstrate why effects such as those on residential character are significant enough to justify a lower density of development²⁶.
209. Despite the above assessment, should further evidence be presented that demonstrates that effects on residential character will be unacceptable, this recommendation would be reconsidered through the hearing process, supported by an assessment of additional methods to manage adverse character effects if necessary.

8.8.4 Alternative A1-Alt 1: Controls for design of family flats/ancillary residential units

210. Dr Farminer and Mr Christos recommended in their report (see Appendix 3) that a requirement that new ancillary residential units be located to the rear of an existing or new dwelling is considered to reduce the effects on streetscape character.
211. This recommendation has been considered and rejected for the following reasons:

²⁵ See Section 3.2.4 of the report **Planning for Housing Survey Report: Dunedin City February 2020** by Elisabeth Boyle and Emily McEwan.

²⁶ See section 3.32 and 3.33 of the **National Policy Statement on Urban Development 2020** published by the Minister for the Environment.

- a. There is nothing in the 2GP that prevents similar sized buildings from being constructed in front of an existing or new house, for example a large double garage, and this sets a permitted baseline against which proposals would be considered;
 - b. In imposing this requirement, it may encourage the demolition of existing dwellings, which would have effects in terms of changing streetscape character;
 - c. New buildings still must comply with bulk and location performance standards, including a requirement for larger front yards than side and rear yards, which limits the street-facing space that can be occupied by buildings;
 - d. Ancillary residential units will still be limited in gross floor area and height, which will minimise the visual dominance of new buildings;
 - e. Many sites that are large enough to accommodate a new ancillary residential unit have existing dwellings that are located closer to the street than the rear boundary which will result in new units in rear yards in many cases;
 - f. Imposing this requirement would reduce the effectiveness of the changes in better achieving Objective 2.6.1 on Housing choices; and
 - g. The NPS-UD provides direction to decision-makers that changes in amenity values are not, of themselves, an adverse effect and to consider the benefits of urban development (Policy 6), and in this case they are considered greater.
212. Overall, it is recommended that additional performance standards to manage the design of ancillary residential units should not pursued because the benefits of providing for the broadened use of family flats outweigh any additional adverse effects on residential character compared to the status quo.

9 CHANGES TO POLICY ON RESIDENTIAL CHARACTER

9.1 Change B5 - Management of density for character and amenity

9.1.1 Purpose of proposal and scope of change

213. The purpose of the proposal is to review the appropriateness of managing density for character and amenity reasons.

9.1.2 Background and issues of concern

214. The Second Generation Dunedin City District Plan (2GP) currently controls density primarily to manage impacts on infrastructure (objectives 2.7.1 and 9.2.1 and policies 2.7.1.3 and 9.2.1.1), and to maintain the character of different residential environments (objectives 2.4.1 and 15.2.4 and policies 2.4.1.5 and 15.2.4.2).
215. Policy 15.2.4.2 describes the way that the density limits have been set in the current plan with regard to character, which is generally to provide for a density that reflects the existing built form of that area (i.e. enabling a continuation of the same form of development).
216. An issue has been identified with the correlation that is made between density and effects on residential character. This is because density is a land use performance standard in the Plan and residential activity does not directly affect residential character without associated development activity. Development activity is managed by separate provisions such as performance standards for the bulk and location of buildings (e.g. maximum height, height in relation to boundary, setbacks from boundaries, and maximum building site coverage). In addition, resource consent is required for multi-unit development, buildings with a footprint greater than 300m² and buildings where any wall visible from an adjoining public place has a continuous length of more than 20m. This enables effects on neighbourhood character and amenity to be managed.
217. In addition, the current approach may be inconsistent with the National Policy Statement on Urban Development 2020 (NPS-UD) policy direction that changes in amenity values are not, of themselves, an adverse effect (Policy 6).
218. The density policies should be amended to prevent consents for non-complying density contraventions from being subject to residential character policy tests as the status quo is reducing the ability to efficiently achieve Objective 2.6.1 on Housing choices.

9.1.3 Proposed change and assessment

219. Change B5 amends policies relating to density to remove the link between density and effects on character and amenity, as this is managed through development rules and density, as a land use control, does not directly relate to the form and structure of the environment.
220. Change B5 includes the following changes:
- Amend Policy 2.2.4.4 to delete clause (c) setting up rules that require density to reflect character outcomes;

- b. Amend Policy 2.4.1.5 to delete reference to density in terms of streetscape and residential amenity;
- c. Delete Policy 15.2.4.2 which requires density to reflect character outcomes; and
- d. Amend Rule 15.13.5.1.b (assessment rule for density contravention) to no longer refer to the deleted provisions.

9.1.3.1 *Assessment against Objective 2.4.1 – Form and structure of the environment*

- 221. Existing provisions which manage development activity in the Residential zones, including the bulk and location performance standards and consent requirements for multi-unit development and larger buildings, are considered sufficient to ensure that effects on residential character are effectively managed in the Plan. This will continue to ensure that Objective 2.4.1 is effectively achieved.

9.1.3.2 *Assessment against Objective 2.6.1 – Housing choices*

- 222. By decoupling the existing policy link between land use density and residential character effects, proposals which contravene the density performance standard will not require consideration for effects in this regard and these will be more properly considered as part of assessing the development aspects of a proposal. Therefore, non-complying density contraventions may be able to be more easily granted where other effects can be managed. This will support the provision of a range of housing choices in the Residential zones.
- 223. No practicable alternatives to the preferred option and status quo have been identified or assessed as part of Change B5.

10 CHANGES FOR SOCIAL HOUSING

10.1 Change C1 – Better provide for social housing

10.1.1 Purpose of proposal and scope of change

224. The purpose of this proposal is to review whether to create separate provisions for social housing (similar to what is done for supported living facilities) so that it can have a more enabling framework for contravention of the density standard in the General Residential 1 and Township and Settlement zones. This will allow medium density social housing in these zones to use any 3 waters capacity that may be available in the relevant networks, taking into account permitted and previously consented development that may occur.

10.1.2 Background and issues of concern

225. Kāinga Ora (formerly Housing New Zealand) is the largest provider of social housing in Dunedin by a significant margin. Various other organisations also provide social housing, including the Dunedin City Council.
226. Kāinga Ora has recently proposed the redevelopment of existing social housing stock in Dunedin to assist in meeting increased demand for social housing, particularly for smaller units. Feedback from Kāinga Ora and the DCC Resource Consents team is that the current Plan approach is limiting the ability to undertake these types of development.
227. Primarily the issues relate to most of Kāinga Ora's properties being in the General Residential 1 and Township & Settlement zones where multi-unit development is not enabled by the Plan. Redevelopment of some of this housing stock is sought to meet unmet demand is for 1- and 2-bedroom units, which are most efficiently provided as part of multi-unit developments rather than as 1 standalone house per site. Of the residential zones, only the medium density zones provide for multi-unit development.
228. Consultation with Kāinga Ora has identified that, while they are actively exploring social housing opportunities in the medium density zones, they also seek to redevelop some of their existing housing estate. Kāinga Ora currently plan to develop 79 new social housing units in Dunedin within the next 3 years, with 95% of these as 1- or 2-bedroom units.
229. Further social housing development beyond this is also anticipated into the medium term, although figures have not been provided by Kāinga Ora. However, data from the Ministry of Housing and Urban Development shows that there were 253 applicants waiting on the Housing Register for Dunedin City as at 30 September 2020.²⁷ This does not include any projections for future changes in demand for social housing.
230. In the General Residential 1 and Township & Settlement zones (not within the no DCC reticulated wastewater mapped area), the performance standard for density (Rule 15.5.2) currently allows for 1 residential unit per 500m² of site area. Contravention of this standard results in the need for consent for non-complying activities in most circumstances. The

²⁷ See the fact sheet **Public Housing in Southern Region**, available at <https://www.hud.govt.nz/assets/Community-and-Public-Housing/Follow-our-progress/December-2020/Housing-regional-Factsheets-September-2020-Southern.pdf>

types of social housing that are most in demand would typically contravene this standard, resulting in a difficult consenting pathway.

- 231. Social housing is currently managed in the Second Generation Dunedin City District Plan (2GP) within the broad definition of 'standard residential' activity. There are no provisions that explicitly provide for consideration of social housing any differently to other residential activity.
- 232. It is considered that the status quo is ineffective in ensuring Objective 2.6.1 is achieved regarding the provision of social housing to meet the community's needs. It is also considered that other changes being progressed through Variation 2 will not adequately provide for the redevelopment of social housing stock to meet demand without further changes.

10.1.3 Proposed Change and Assessment

- 233. Change C1 makes several changes to better enable the development of social housing. It includes adding a new sub-activity under 'standard residential' activity, being 'social housing'. This will link to a new definition for 'social housing'. It is proposed to make contravention of the density standard by social housing a restricted discretionary activity (rather than non-complying) in the General Residential 1 Zone and Township and Settlement Zone (except in a **no DCC reticulated wastewater mapped area**), provided it meets the density standard for General Residential 2 Zone.
- 234. It is also proposed to add a new policy in the strategic directions that reflects this approach.
- 235. The matters of discretion for a social housing density contravention are proposed to be:
 - a. Effects on efficiency and affordability of infrastructure - to ensure that the effects arising from the additional density of activity on public infrastructure are managed; and
 - b. Effects on accessibility – encouraging medium density social housing to locate where there is good walking access to public transport.
- 236. It is also proposed to extend the application of the current multi-unit development rule (Rule 15.3.4.5) so that it applies in all residential zones, not just General Residential 2 Zone (GR2) and Inner City Residential Zone (ICR). This rule makes 'multi-unit development' (defined as *"The construction of a single or multiple buildings that contain three or more residential units on a site within a two year period"*) a restricted discretionary activity to ensure the design of such developments is appropriate to the context. Further changes to the provisions for multi-unit development are proposed through Variation 2 under Change F.
- 237. As these activities will be restricted discretionary, the effects of such developments cannot be considered as part of the permitted baseline for assessments of non-social housing multi-unit development. This will assist DCC with managing the risk of these provisions setting a precedent for widespread multi-unit housing development in the standard density zones.
- 238. A change being proposed to the performance standard for minimum site size for subdivision (Change B6) will enable social housing developments undertaken based on the new

provisions to then be subdivided without triggering a non-complying activity status for subdivision consent.

239. In summary, Change C1 includes the following primary changes:

- a. Amend the nested table for the residential activities category;
- b. Add a definition of 'social housing';
- c. Add Policy 2.6.1.X on density for social housing;
- d. Add Policy 6.2.2.X on accessibility for social housing;
- e. Add assessment rules at Rule 6.10.3.X; Rule 9.5.3.AA, and Rule 15.10.3.X for assessment of accessibility and public infrastructure;
- f. Amend Rule 15.3.4.5 (activity status table for multi-unit development); and
- g. Amend the performance standard for density at Rule 15.5.2.4.

240. The consequential changes required are:

- a. Amend the definition of 'standard residential';
- b. Amend the introduction to the General Residential 1 Zone at 15.1.1.1; and
- c. Amend the assessment Rule 15.11.3.1 for multi-unit development.

10.1.3.1 *Assessment against Objective 2.6.1 – Housing Choice*

- 241. Providing for development of social housing in the General Residential 1 Zone and the Township & Settlement Zone (except in **no DCC reticulated wastewater mapped areas**) at a medium density will increase the ability of social housing providers to develop a range of housing options for social housing purposes.
- 242. Overall, this change will have positive effects on the provision of social housing typologies that better meet the community's needs, such as provision of one- and two-bedroom units, which would be able to be efficiently developed as part of multi-unit development.
- 243. In particular, it is anticipated that the proposed changes will provide for redevelopment of existing social housing stock operated by Kāinga Ora. This will facilitate their work programme to increase the availability of social housing stock in Dunedin and provide housing options to people with the greatest housing needs and for whom the market does not provide new housing stock.
- 244. These factors will ensure that Objective 2.6.1 on Housing choice can be better achieved by providing for the development and redevelopment of social housing stock to better meet the community's needs, and to support the social well-being of social housing clients.

10.1.3.2 *Assessment against Objective 2.7.1 – Infrastructure*

- 245. Providing for development of social housing in the General Residential 1 Zone and the Township & Settlement Zone (except in **no DCC reticulated wastewater mapped areas**) at a medium density will increase the demand for public infrastructure in the areas where development takes place.

246. Increase in demand for wastewater infrastructure is of concern, given the constraints that exist across the city. However, the following factors will limit the impacts on public infrastructure and enable them to be appropriately managed:
- a. The exceptions to the density performance standard will only apply to social housing activity to be let by the providers identified in the definition for 'social housing';
 - b. The provisions still limit development potential to that for the General Residential 2 Zone;
 - c. Properties currently used for social housing are distributed amongst other standard residential activity, even where there are 'clusters' of these properties in certain areas;
 - d. The exceptions will not apply in areas subject to the **no DCC reticulated wastewater mapped area**, so will not increase demand for on-site wastewater disposal;
 - e. The exception to the density performance standard will still apply a restricted discretionary activity status, with 'effects on efficiency and affordability of infrastructure' and 'effects on accessibility' as matters of discretion. This will enable consideration of these effects through a consenting process and the ability to assess the appropriateness of mitigation measures;
 - f. Restricted discretionary activity status for social housing contravening the density standard will prevent the establishment of a permitted baseline for other standard residential activity; and
 - g. Performance standards for maximum building site coverage and impermeable surfaces will continue to apply to manage effects on stormwater infrastructure.
247. These factors will ensure that Objective 2.7.1 and related Objective 9.2.1 can still be effectively and efficiently achieved whilst also enabling Objective 2.6.1 on Housing choice to be better achieved.

10.1.3.3 *Assessment against Objective 2.4.1 – Form and structure of the environment*

248. Providing for development of social housing in the General Residential 1 Zone and the Township & Settlement Zone (except in **no DCC reticulated wastewater mapped areas**) at a medium density will provide for some change in the character and amenity of these residential urban environments which could be unacceptable if not appropriately managed.
249. However, the following factors will limit the impacts on residential character and amenity and enable them to be appropriately managed:
- a. The exceptions to the density performance standard will only apply to social housing activity to be let by the providers identified in the definition for 'social housing';
 - b. The provisions still limit development potential to that for the General Residential 2 Zone;
 - c. Properties currently used for social housing are distributed amongst other standard residential activity, even where there are 'clusters' of these properties in certain areas;

- d. The exception to the density performance standard will still apply a restricted discretionary activity status preventing the establishment of a permitted baseline for other standard residential activity; and
 - e. The existing rule requiring consent for multi-unit development in the GR2 and ICR zones will be extended to apply to all residential zones and will enable consideration of 'effects on streetscape amenity and character' through the consenting process.
250. These factors will ensure that Objective 2.4.1 and related objectives 15.2.3 and 15.2.4 can still be effectively and efficiently achieved whilst also enabling Objective 2.6.1 on Housing choice to be better achieved.

10.1.3.4 *Assessment against other relevant objectives*

251. This proposal will also be more effective in terms of achieving Objective 2.2.2 on Energy Resilience. This is because it provides for the redevelopment of existing social housing stock, resulting in an improvement of housing quality in the city. This will provide positive energy cost and health impacts for social housing clients who can move into newer housing stock.
252. The proposal will also provide some improvement in the availability of housing development capacity to better achieve Objective 2.6.2 on Adequate Urban Land Supply.

10.1.4 Alternatives Assessed

253. In addition to the status quo and the preferred option outlined above, other options have been considered as alternatives to achieve the objectives of the Plan relevant to social housing provision. These alternatives have been assessed and recommended as part of other proposals for Variation 2 and include:
- a. Changes to the density and minimum site size performance standards in the General Residential 1 and Township and Settlement Zones (not within a **no DCC reticulated wastewater mapped area**). These include Changes A1, A2, A3, B1, B3, B4, B6, E9 assessed in Section 8 of this report, including the alternatives assessed for these changes.
 - b. Rezoning of some areas of General Residential 1 Zone to General Residential 2 Zone to provide for medium density land use for all standard residential activity. These areas include some where there are clusters of social housing, including at Mosgiel (Change IN01), Green Island (Change IN02 & Change IN03), Concord (Change IN04) and Wakari (Change IN11). It is noted that Variation 2 is not a full review of zoning across the city and areas that are not identified as having been reviewed in Variation 2 are outside the scope of Variation 2.

11 CHANGES FOR SUBDIVISION OF LARGE GREENFIELD AREAS

11.1 Summary and overall purpose of proposal and scope of change

254. This section describes and assesses changes proposed to improve the way subdivision of large areas of greenfield residential zoning is managed in the Plan due to the addition of significant areas of greenfield rezoning through Variation 2 and Second Generation Dunedin City District Plan (2GP) decisions. This includes Changes D1, NDMA2-15, E5, D4, D5, D6, D7 and D8.
255. The overall purpose of the proposal is to add methods to the Plan to ensure that the subdivision of large areas of greenfield residential land is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated yet flexible way. The scope of this proposal does not include reviewing existing methods in the Plan that may manage issues on greenfield land (e.g. the existing set of overlays and provisions that sit under them) and it does not review the criteria for zoning new residential land, where new land should be provided, or the zone types provided for in the Plan.
256. In addition to the general rules and assessment guidance for subdivision, the Plan includes a variety of methods to manage site specific issues and requirements (e.g. those relating to hazards, landscape, and biodiversity etc.). These methods include the use of overlay zones and mapped areas (including structure plan mapped areas) and associated rules. These methods are generally applied as relevant to greenfield areas as part of the decision to rezone the area.
257. However, it is considered useful to include a framework for assessing subdivisions in larger greenfield areas to augment these methods, particularly to manage issues that are common concerns for most large greenfield areas. This approach will help prevent the proliferation of individual structure plan mapped areas and improve Plan efficiency.
258. In addition, this framework will provide improved guidance for some issues that are already managed through the matters of discretion for subdivision by having a bespoke set of policies and assessment guidance appropriate to larger greenfield subdivisions. This is desirable because subdivision of larger areas requires a different level and extent of assessment to smaller infill subdivisions.
259. The overall approach proposed is to introduce a new method to the plan, being the 'new development mapped area' (NDMA) and apply this to existing and proposed large areas of greenfield residential zoning. This will enable specific objectives, policies, and assessment rules which are appropriate to the assessment of large greenfield residential subdivisions to be applied in these areas.

11.2 Relevant Objectives

260. Section 32(1)(b) of the Act requires an assessment of whether the proposed provisions (policies and methods) are the most appropriate way to achieve the objective or purpose of the proposal. Section 32(3) also requires it to be assessed against the objectives of the 2GP.

261. The relevant objectives (which are provided in full in Appendix 1) have been identified as:

- a. Objective 2.2.2: Environmental performance and energy resilience;
- b. Objective 2.2.3: Indigenous biodiversity and related objective 10.2.4;
- c. Objective 2.2.4: Compact and accessible city;
- d. Objective 2.3.3: Facilities and spaces that support social and cultural well-being;
- e. Objective 2.4.1: Form and structure of the environment and related objectives 15.2.3 and 15.2.4; and
- f. Objective 2.7.1: Efficient public infrastructure and related objective 9.2.1.

262. This assessment must:

- a. identify other reasonably practicable options for achieving the objectives;
- b. assess the efficiency and effectiveness of the provisions in achieving the objectives, including consideration of the benefits and costs anticipated from the implementation of the provisions, and the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions; and
- c. summarise the reasons for deciding on the provisions.

263. In addition, as this proposal includes the addition of a new objective, this must be assessed in terms of its appropriateness to achieve the purpose of the Act, in accordance with Section 32(1)(a) of the Act.

11.3 Overall background and issues of concern

264. The 2GP was drafted anticipating that most new greenfield areas would be added to the Plan along with a structure plan to direct the area's future development, as this is what had happened in the past. The 2GP currently encourages this approach in the following strategic directions:

- a. Policy 2.2.4.1, which provides for the use of structure plans where land cannot be zoned at a standard or medium density due to hazards, slope, need for on-site stormwater storage, protection of biodiversity, presence of water bodies, landscape or natural character values, or other factors. Therefore, in these cases structure plans provide for a lower density of development;
- b. Policy 2.4.1.7, which sets up a method to require large new subdivisions to provide concept or structure plans to demonstrate transport connectivity;
- c. Policy 2.4.1.8, which sets up a method to require subdivision to enable future development to meet the requirements of structure plans included in the 2GP. Therefore, this policy is about enforcing structure plan requirements;
- d. Policy 2.6.1.7, which requires structure plans for large subdivisions to ensure Policy 2.6.1.6 and Policy 2.2.2.5 are achieved (which relate to urban design principles, energy efficiency, transport connectivity and solar access); and

- e. Policy 2.7.1.2, which sets up a method to require public infrastructure networks to be included as part of a structure plan to ensure new development represents the least possible long term cost to the public.
- 265. Structure plans were added for some sites through the 2GP particularly where there were on-site values or constraints that needed to be managed. The 2GP currently contains eleven structure plan mapped areas, however many of the recent ones include limited provisions.
- 266. Feedback was received through the 2GP's development, and through the hearings process, that it would be more efficient if new zoned areas could be added without always requiring a structure plan and instead managing issues through the subdivision consent process.
- 267. Currently, all subdivision requires a consent as a restricted discretionary activity. A range of matters can be considered (Rule 15.11.4.1) including:
 - a. Effects on neighbourhood residential character and amenity (assessment guidance in Rule 15.11.4.1.a);
 - b. Risk from natural hazards (assessment guidance in Rules 11.5.2.1 and 11.5.2.5);
 - c. Effects on efficiency and affordability of infrastructure (assessment guidance in Rules 9.6.2.4 and 9.6.2.5); and
 - d. Effects on the safety and efficiency of the transport network (assessment guidance in Rules 6.11.2.1, 6.11.2.7, 6.11.2.8).
- 268. However, these matters and the guidance that supports them is more geared to smaller infill subdivisions and not to subdivision and development of larger greenfield areas, which have different considerations with respect to these matters. Furthermore, some matters included in the strategic directions are only referenced via the promotion of structure plans as a means of ensuring they are achieved, and they are not built into the subdivision guidance explicitly.
- 269. In order to remove the requirement for structure plans for all larger greenfield areas, there is a need to manage the following outcomes through additional subdivision guidance for large greenfield residential areas:
 - a. Subdivisions designed for solar access and energy-efficient housing to ensure Objective 2.2.2 on Environmental performance and energy resilience is more effectively achieved, as current provisions are not implemented by lower-order policy;
 - b. Provision of amenity planting and public amenities to ensure Objective 2.4.1 on character and amenity is more effectively achieved;
 - c. Provision of recreation spaces and access to other community facilities to ensure Objective 2.3.3 on Facilities and spaces that support social and cultural well-being and Objective 2.4.1 on character and amenity are more effectively achieved;
 - d. Maintenance or enhancement of natural environmental values to ensure Objective 2.2.3 on Indigenous biodiversity and Objective 2.4.1 on character and amenity are more effectively achieved; and

- e. Ensuring the land and public infrastructure resources are used efficiently so that Objective 2.2.4 on Compact and accessible city, Objective 2.2.2 on Environmental performance and energy resilience, and Objective 2.7.1 on Efficient infrastructure are more effectively achieved.
270. Other new provisions relating to stormwater and wastewater infrastructure are also considered necessary, and these matters are considered separately under Change F.
 271. Overall, it is considered that the current framework does not achieve the purpose of the proposal, which is to have flexibility in the methods used in the plan to ensure that greenfield areas are developed in a way that achieves the Plan's strategic objectives.
 272. It is also considered that where matters are not adequately covered off in structure plans, subdivision may not be managed appropriately in terms of the Plan's strategic objectives.
 273. Specific assessment of the relevant changes is outlined in the sections below, followed by an assessment of alternatives.

11.4 Change D1 – Broad changes linked to new development mapped area (NDMA) provisions

11.4.1 Purpose of proposal and scope of change

274. In light of the overall purpose of the proposal to ensure that the subdivision of large areas of greenfield residential land is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated yet flexible way, Change D1 includes overarching changes that support the addition of the new NDMA method which are not assigned to other more specific topic focused changes.

11.4.2 Proposed change and assessment

275. Change D1 includes the addition of a new Objective 12.2.X to Section 12 of the Plan to set up the new policy and assessment framework for managing subdivision in large greenfield areas where the NDMA is applied.
276. Change D1 also makes changes to the title and introduction to Section 12 to reflect the inclusion of the new package of provisions. This includes linking this section back to the purpose of the National Policy Statement on Urban Development 2020 (NPS-UD), drawing on guidance from the Ministry for the Environment²⁸ by adding the following summary:

The National Policy Statement for Urban Development 2020 (NPS-UD) recognises the national significance of having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future, and of providing sufficient development capacity to meet the different needs of people and communities...

To ensure the development of well-functioning urban environments that provide for people's well-being, this section also includes an objective, policies and assessment

²⁸ See guidance provided on the Ministry for the Environment website at: <https://www.mfe.govt.nz/about-national-policy-statement-urban-development>

rules to guide the subdivision and development of larger areas of 'greenfield' residential zoned land (identified by the new development mapped area in the Planning Map). These provisions reflect the Plan's strategic directions and best practice urban planning and design principles.

277. Change D1 includes the following general changes for the addition of the NDMA method:

- a. Add new acronym NDMA (New development mapped area);
- b. Add reference to NDMA in new Policy 2.6.2.AA;
- c. Amend Section 12 Title;
- d. Amend Section 12.1 Introduction;
- e. Add new Objective 12.2.X regarding development of future urban growth areas;
- f. Add new Rule 12.X.2.5 subdivision assessment guidance;
- g. Amend 15.1.1.1 Zone description;
- h. Add new Rule 15.11.5.Y subdivision assessment guidance linking to Section 12.

11.4.2.1 Assessment against relevant objectives

278. Change D1 provides the overall means to more flexibly manage the effects from subdivision of large areas of greenfield residential land to achieve the relevant objectives of the Plan. It also ensures that these are more efficiently achieved by avoiding the need to application of separate structure plan mapped areas and performance standards to each residential rezoning site.
279. Change D1 will therefore ensure that Objective 2.2.2 on Environmental performance and energy resilience, Objective 2.2.3 on Indigenous biodiversity, Objective 2.2.4 on Compact and accessible city, Objective 2.3.3 on Facilities and spaces that support social and cultural well-being, and Objective 2.7.1 on Efficient public infrastructure, can be better achieved.

11.4.2.2 Assessment of new Objective 12.2.X against the purpose of the Act

280. The addition of Objective 12.2.X will support the sustainable management of residential urban expansion. This is because it will enable the development of new housing to support people in providing for their social, economic, and cultural well-being and for their health and safety, at the same time as ensuring that the potential for effects on the environment of this activity are appropriately managed through the assessment of subdivision consent applications.

11.5 Change NDMA02-15 – Mapping NDMA over existing greenfield residential areas

11.5.1 Purpose of proposal and scope of change

281. In light of the overall purpose of the proposal to ensure that the subdivision of large areas of greenfield residential land is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated yet flexible way,

Change NDMA02-15 apply the new development mapped area to existing large greenfield residential areas so that the proposed new assessment rules for subdivision in an NDMA will apply to them. Within scope of this proposal but not yet included in the variation is application of the NDMA to any additional large green areas that may be added to the 2GP through the resolution of the current appeals on the 2GP. This means if these changes are approved by the Court ahead of decisions being finalised on Variation 2, these overlays can be added to those sites.

282. For new greenfield areas being proposed through Variation 2, the addition of the NDMA is addressed separately in the assessments relevant to each change later in this report.

11.5.2 Proposed change and assessment

283. Change NDMA02-15 include mapping the NDMA over most existing undeveloped structure plan mapped areas and all remaining residential transition overlay zones, as shown in Table 13.

Table 13: Existing greenfield residential zoned areas where the NDMA is proposed to apply

Change	Location	
NDMA02	Emerson Street / Blackhead Road, Concord	See Appendix 10, page 31
NDMA03	Patmos Avenue, Pine Hill	See Appendix 10, page 32
NDMA04	Bradford	See Appendix 10, page 33
NDMA05	Dalziel Road	See Appendix 10, page 34
NDMA06	St Leonards	See Appendix 10, page 35
NDMA07	Opoho	See Appendix 10, page 36
NDMA08	Pine Hill	See Appendix 10, page 37
NDMA09	Balmacewen Road, Wakari	See Appendix 10, page 38
NDMA10	Halfway Bush	See Appendix 10, page 39
NDMA12	St Clair	See Appendix 10, page 40
NDMA13	St Albans Street, Kaikorai Valley	See Appendix 10, page 41
NDMA14	Ettrick Street, Kaikorai Valley	See Appendix 10, page 42
NDMA15	Salisbury Road, Kaikorai Valley	See Appendix 10, page 43

284. Two existing Residential Transition Overlay Zone (RTZ) sites, at 636 North Road and 25A Irvine Road, are not proposed to have an NDMA applied through Variation 2. This is because they are both subject to a 2GP appeal, currently under mediation, to remove the RTZ and

rezone the sites to a residential zone. Application of the NDMA will be considered separately through that mediation process.

11.5.2.1 *Assessment against relevant objectives*

285. The proposed mapping changes will assist in providing the means to manage effects from subdivision of large areas of greenfield residential land that are not currently addressed by the subdivision assessment rules or structure plan mapped areas. Therefore, they will ensure that Objective 2.2.2 on Environmental performance and energy resilience, Objective 2.2.3 on Indigenous biodiversity, Objective 2.2.4 on Compact and accessible city, Objective 2.3.3 on Facilities and spaces that support social and cultural well-being, and Objective 2.7.1 on Efficient public infrastructure, can be better achieved in these locations.

11.6 Change E5 - Strategic direction policies related to structure plans

11.6.1 Purpose of proposal and scope of change

286. In light of the overall purpose of the proposal to ensure that the subdivision of large areas of greenfield residential land is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated yet flexible way, Change E5 focuses on clarifying the strategic directions regarding when structure plans should be used at the time of a plan change for rezoning, given the recommended options adding the NDMA method.

11.6.2 Proposed change and assessment

287. Change E5 makes several changes to strategic direction policies (and one change to the Section 12 Urban Land Transition Provisions) which relate to plan changes and the use of structure plans. These changes clarify the expectations around when structure plans should be used and is linked to the introduction of the new development mapped area provisions.
288. In addition, this change clarifies some of the terminology in the strategic directions regarding structure plans, as they currently refer to a selection of different terms, including concept plan, development plan and subdivision plan, which can cause confusion as to whether these are to be included in the Plan itself or required as part of the subdivision process.
289. Change E5 includes the following changes:
- a. Amend Policy 2.4.1.7 to delete the requirement for structure plans for connectivity;
 - b. Delete Policy 2.6.1.7 requiring structure plans for large subdivisions as this duplicates other strategic direction content;
 - c. Add new Policy 2.6.2.Z encouraging the use of structure plans to add areas of mixed-use zoning or provisions for commercial or community activities where necessary;
 - d. Add new Policy 2.6.2.AA on plan changes and the use of structure plans to manage risks, effects, constraints or values present on a rezoning area (see also Change E6); and

- e. Delete Rule 12.3.4 Information requirements for Transition Overlay Zones.

11.6.2.1 Assessment against relevant objectives

- 290. The amendments proposed in Change E5 are minor in nature and will support other changes proposed in Variation 2 and provide greater certainty and clarity for plan users about when structure plan mapped areas should be applied.
- 291. Overall, Change E5 will ensure that a wide range of strategic directions can be more efficiently and effectively achieved.

11.7 Change D4 – Provision of social and recreational spaces in large greenfield subdivisions

11.7.1 Purpose of proposal and scope of change

- 292. In light of the overall purpose of the proposal to ensure that the subdivision of large areas of greenfield residential land is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated yet flexible way, Change D4 focuses on reviewing and adding provisions that direct the provision of social and recreational spaces as part of the subdivision of large greenfield residential areas.

11.7.2 Proposed change and assessment

- 293. The assessment of subdivision for effects on neighbourhood residential character and amenity and effects on the safety and efficiency of the transport network is already provided for in the Plan and gives scope to consider the provision of outdoor recreational spaces and off-road cycling and walking tracks within subdivisions.
- 294. The assessment of effects on neighbourhood residential character and amenity is guided by Policy 15.2.4.6, which states:

Only allow subdivision activities where the subdivision is designed to ensure any future land use and development will:

- a. maintain the amenity of the streetscape*
- b. reflect the current or future intended character of the neighbourhood;*
- c. provide for development to occur without unreasonable earthworks or engineering requirements; and*
- d. provide for quality housing.*

- 295. The assessment of effects on the safety and efficiency of the transport network is guided by Policy 6.2.3.9, which states:

Only allow land use and development activities or subdivision activities that may lead to land use or development activities, where:

- i. adverse effects on the safety and efficiency of the transport network will be avoided or, if avoidance is not practicable, adequately mitigated; and*

- ii. *any associated changes to the transportation network will be affordable to the public in the long term.*

296. As such, there is an opportunity to enhance the assessment of subdivision for large greenfield areas by explicitly guiding the provision of social and recreational spaces in a new policy and assessment framework through Change D4.

297. Change D4 includes the following changes:

- a. Amend Policy 2.3.3.1 to add a new clause for provision of social, cultural, community and recreational spaces in NDMA's;
- b. Delete Policy 2.6.1.6.b because this matter is best covered under Objective 2.3.3;
- c. Add a clause to new Objective 12.2.X linking to Objective 2.3.3;
- d. Add new Policy 12.2.X.1 for provision of social and recreational spaces in NDMA's;
- e. Add new Rule 12.X.2.5.c subdivision assessment rule; and
- f. Add new Rule 15.11.5.Y subdivision assessment rule linking to Section 12.

11.7.2.1 *Assessment against Objective 2.3.3 – Facilities and spaces that support social and cultural well-being*

298. Change D4 will ensure Objective 2.3.3 is more effectively achieved by setting out specific assessment policies and rules for ensuring good access to recreation opportunities and community facilities as a part of subdivision in an NDMA. Currently there are no provisions that specifically enable consideration of this at the time of subdivision.

299. Change D4 will also ensure Objective 2.6.1: Housing choices is better achieved by deleting Policy 2.6.1.6.b which is part of a policy which is not directly related to this objective and fits better under Objective 2.3.3.

11.7.2.2 *Assessment against Objective 2.4.1 – Form and structure of the environment*

300. Change D4 will also have benefits in terms of Objective 2.4.1 by providing for green and other open spaces to contribute to the aesthetic appreciation for and enjoyment of the city.

11.8 Change D5 – Solar access in large greenfield subdivisions

11.8.1 Purpose of proposal and scope of change

301. In light of the overall purpose of the proposal to ensure that the subdivision of large areas of greenfield residential land is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated yet flexible way, the purpose of Change D5 is to provide improved guidance on how solar access should be considered as part of the subdivision of large areas of greenfield residential land.

11.8.2 Proposed change and assessment

302. There is a need to ensure subdivisions in large new greenfield residential areas are designed for solar access and energy-efficient housing to ensure Objectives 2.2.2 & 2.2.5 on Environmental performance and energy resilience are more effectively achieved.
303. Currently this issue is assessed as part of the effects on neighbourhood residential character and amenity and Policy 15.2.4.6. In the assessment rule (Rule 15.11.4.1) the following assessment guidance is under the heading 'Design considerations that may support a consent application include':

The layout of the subdivision takes into account solar orientation and is designed to ensure future development will facilitate a high level of passive solar gain.

304. However, this guidance is not supported by explicit policy in the Residential section, other than by reference to provision for 'quality housing' in Policy 15.2.4.6. While this approach is acceptable for smaller infill subdivisions where subdivision design is likely to be more strongly guided by factors other than solar access (due to site constraints), it could be improved to support the assessment of subdivision in large greenfield residential areas where there is likely to be greater flexibility in how subdivisions are designed.
305. Change D5 provides for a new policy framework and assessment guidance for assessing solar access as part of the subdivision of large areas of greenfield residential land.
306. Change D5 includes the following changes for solar access:
- a. Delete Policy 2.2.2.5.b and Policy 2.2.5.3.a and replace with new clause in new Policy 2.2.2.X.a on assessing solar access at subdivision;
 - b. Add a clause to new Objective 12.2.X linking to Objective 2.2.2;
 - c. Add new Policy 12.2.X.3 for consideration of solar access in NDMA's;
 - d. Add new Rule 12.X.2.5.a subdivision assessment rule; and
 - e. Add new Rule 15.11.5.Y subdivision assessment rule linking to Section 12.

11.8.2.1 **Assessment against Objectives 2.2.2 & 2.2.5 – Environmental performance and energy resilience**

307. The addition of a new policy to guide the assessment of solar access will give greater support to achieving objectives 2.2.2 and 2.2.5. This is an improvement over the current approach, where solar access policy is only included in the strategic directions (which are not intended to guide the assessment of resource consents for restricted discretionary activities). Overall, the proposed changes will enable Objectives 2.2.2 & 2.2.5 to be more effectively achieved as part of the subdivision of land within an NDMA.

11.9 Change D6 - Protection of natural environmental values in large greenfield subdivisions

11.9.1 Purpose of proposal and scope of change

308. In light of the overall purpose of the proposal to ensure that the subdivision of large areas of greenfield residential land is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated yet flexible way, the purpose of Change D6 is to provide for the consideration of the protection of natural environmental values (including indigenous biodiversity) as part of the subdivision process in large greenfield residential areas. The scope of this change does not include reviewing existing methods for the protection of natural environment values in urban environments, including urban biodiversity mapped areas and rules, esplanade requirements, and structure plan mapped area rules.

11.9.2 Proposed change and assessment

309. There is a need to ensure the maintenance or enhancement of natural environmental values as part of the subdivision of large greenfield residential areas to ensure Objective 2.2.3 on Indigenous biodiversity and Objective 2.4.1 on Form and structure of the environment are more effectively achieved. Currently, assessment of these values is not provided for in the matters of discretion for subdivision.
310. Protection of natural environmental values is currently achieved through the application of an Area of Significant Biodiversity Value overlay (ASBV) in rural, rural residential and recreation zones, and rules that manage vegetation clearance in these zones. In an urban setting, an Urban Biodiversity Mapped Area (UBMA) can be used to protect important areas of biodiversity. At the time of plan change, a structure plan mapped area and associated rules can also be applied to protect natural environmental values.
311. The existing methods described above are generally still considered the most appropriate ways to manage natural environmental values in greenfield residential areas where they can be applied at the time of plan changes. However, it is considered desirable to augment those methods with the ability to also consider natural environment values at the time of subdivision. This would provide a 'back stop' if a more detailed site assessment at the time of subdivision reveals values that were not identified at the time of the plan change, and where it is considered that the values identified through the plan change assessment are better managed at the time of subdivision.
312. Change D6 includes the following changes for protection of environmental values:
- a. Add a clause to new Objective 12.2.X linking to Objective 2.2.3 on indigenous biodiversity;
 - b. Add new Policy 12.2.X.2 for consideration of environmental values in NDMAs;
 - c. Add new Rule 12.X.2.5.d subdivision assessment rule; and
 - d. Add new Rule 15.11.5.Y subdivision assessment rule linking to Section 12.

11.9.2.1 *Assessment against Objective 2.2.3 – Indigenous biodiversity*

313. Change D6 on the protection of natural environmental values will ensure that effects on areas of indigenous biodiversity that are not protected by the application of a mapped area and associated provisions can be considered as part of a subdivision consent in a NDMA. These provisions can then be relied on where areas of indigenous biodiversity are small or cannot be adequately assessed at the time of rezoning. This will ensure that Objective 2.2.3 can be more effectively achieved.

11.9.2.2 *Assessment against Objective 2.4.1 - Form and structure of the environment*

314. Change D6 adds provisions to Section 12 to protect areas with natural environmental values as part of subdivision in an NDMA, including values beyond indigenous biodiversity. Such values are not currently assessed as part of subdivision, except where special provisions regarding mapped areas apply. In some cases, areas with environmental values in greenfield residential zoned areas are not mapped with a mapped area. The addition of these provisions will ensure that effects on these values can be considered as part of the assessment of subdivision, to ensure that Objective 2.4.1 is more effectively achieved.

11.9.2.3 *Assessment against Objective 10.2.1 – Biodiversity values*

315. The decision version of Objective 10.2.1 states:
- Biodiversity values are maintained or enhanced, including by protecting areas of significant indigenous vegetation and the significant habitats of indigenous fauna.*
316. The amendments proposed in Change D6 will ensure that effects on these natural environmental values as well as biodiversity values can be considered as part of the assessment of subdivision, to ensure that Objective 10.2.1 is more effectively achieved.

11.10 *Change D7 - Providing for amenity planting and public amenities in large greenfield subdivisions*

11.10.1 *Purpose of proposal and scope of change*

317. In light of the overall purpose of the proposal to ensure that the subdivision of large areas of greenfield residential land is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated yet flexible way, the purpose of Change D7 is to improve guidance on the provision of amenity planting and public amenities as part of the subdivision of large greenfield residential areas.

11.10.2 *Proposed change and assessment*

318. Effects on neighbourhood residential character and amenity is already a matter of discretion for all subdivision activities in residential zones. It is guided by Policy 15.2.4.6, which states:
- Only allow subdivision activities where the subdivision is designed to ensure any future land use and development will:*

- a. maintain the amenity of the streetscape*

- b. *reflect the current or future intended character of the neighbourhood;*
- c. *provide for development to occur without unreasonable earthworks or engineering requirements; and*
- d. *provide for quality housing.*

319. Structure plan mapped areas and associated rules are also a method by which requirements for amenity plantings and public amenities can be included.
320. Change D7 provides for a new policy framework and expanded assessment guidance for assessing the provision of amenity planting and public amenities in larger greenfield subdivisions to further enhance the assessment of subdivision in the NDMA.
321. Change D7 includes the following changes:
- a. Add a clause to new Objective 12.2.X referring to Objective 2.4.1;
 - b. Add new Policy 12.2.X.4 for consideration of amenities in NDMAs;
 - c. Add new Rule 12.X.2.5.b subdivision assessment rule; and
 - d. Add new Rule 15.11.5.Y subdivision assessment rule linking to Section 12.

11.10.2.1 Assessment against Objective 2.4.1 – Form and structure of the environment

322. Change D7 adds provisions to Section 12 and Section 15 to ensure adequate amenity planting and public amenities are included as part of subdivision in an NDMA. Greater policy support and assessment guidance through the new provisions in Section 12 will ensure that Objective 2.4.1 can be more effectively achieved in areas subject to an NDMA, without applying these to smaller-scale infill subdivisions.

11.11 Change D8 - Providing for efficient use of land in large greenfield subdivisions

11.11.1 Purpose of proposal and scope of change

323. In light of the overall purpose of the proposal to ensure that the subdivision of large areas of greenfield residential land is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated yet flexible way, Change D8 provides for a new policy framework and assessment guidance for the efficient use of land as part of the subdivision of large greenfield residential areas.

11.11.2 Proposed change and assessment

324. Objective 2.2.4 on Compact and accessible city is the overarching strategic direction regarding urban form for Dunedin. This objective is currently achieved in part by the implementation of Policy 2.2.4.1 which seeks to *“Prioritise the efficient use of existing urban land over urban expansion...”* and sets a preference for zoning residential land without constraints at least to a standard density zone, and to a medium density zone where appropriate. As such, the efficient use of land is currently primarily achieved through the choice of zone applied at the time of a plan change.

325. Objective 2.2.4 and the efficient use of land also link to the achievement of other objectives, such as those that seek to protect rural character (Objective 2.4.6) and rural productivity (Objective 2.3.1), those that seek to support energy resilience and reduced car dependency (Objective 2.2.2), and Objective 2.7.1 which seeks efficient infrastructure. Currently the assessment rules for subdivision (Rule 15.11.4.1) provide discretion to consider 'Effects on efficiency and affordability of infrastructure', which provides some ability to consider how the subdivision impacts the efficiency and affordability of existing and planned public infrastructure.
326. The current approach to ensuring the efficient use of land and associated effects on efficient public infrastructure could be further enhanced by adding provisions to enable subdivisions to be specifically assessed for how efficiently they provide for additional residential development. This will assist in managing future demand for urban expansion by ensuring current greenfield residential land is subdivided as efficiently as practicable.
327. Change D8 includes the following changes for the efficient use of land:
 - a. Amend Policy 2.7.1.2 to add a new clause about efficient use of land to support infrastructure efficiency;
 - b. Add clauses to new Objective 12.2.X that link to Objective 2.2.4 and 2.7.1;
 - c. Add new Policy 12.2.X.5 for consideration of efficient use of land in NDMA's;
 - d. Add new Rule 12.X.2.5.e subdivision assessment rule. This introduces a new matter of discretion of 'Whether subdivision design supports efficient use of land'; and
 - e. Add new Rule 15.11.5.Y subdivision assessment rule linking to Section 12.

11.11.2.1 *Assessment against Objective 2.2.4 – Compact and accessible city*

328. Change D8 will provide specific guidance for the assessment of subdivision in large greenfield residential areas to ensure land is used efficiently. This is important to minimise the extent to which further urban expansion might be required in the future to assist in achieving Objective 2.2.4. This also has benefits in achieving a range of other related objectives, such as Objective 2.4.6 on the Character of the rural environment and Objective 2.3.1 on Land important for economic productivity (by minimising urban expansion into the rural environment and the loss of productive land); Objective 2.7.1 on Efficient public infrastructure (by ensuring existing and planned infrastructure is not underutilised and costs are adequately recovered); and Objective 2.6.1 on Housing choice (by encouraging smaller and more affordable housing types to meet demand).

11.11.2.2 *Assessment against Objective 2.2.2 – Environmental performance and energy resilience*

329. Change D8 will also have benefits in terms of Objective 2.2.2 by encouraging an efficient urban form to assist in reducing the energy required to expand and maintain urban infrastructure and by reducing future reliance on private motor cars through encouraging more compact development patterns.

11.12 Alternatives assessed

330. This section sets out an assessment of alternatives to the status quo and the preferred options outlined above regarding the addition of the NDMA method (Changes D1, D4, D5, D6, D7, D8 & NDMA1-15).
331. The alternatives assessed include the following two options:
 - a. Use of performance standards instead of assessment rules as part of the NDMA method to achieve similar outcomes for the specific topics this method addresses (Alternative D1-Alt1); and
 - b. Apply the assessment rules proposed as part of the preferred option to all subdivision, rather than only in an NDMA (Alternative D1-Alt2).

11.12.1 Alternative D1-Alt1: Performance standards in NDMA

332. Alternative D1-Alt1 is to use performance standards associated with the NDMA, rather than policies and assessment rules, to address the same topics for subdivision in large greenfield residential areas. These topics are:
 - a. Provision of social and recreational spaces;
 - b. Designing for solar access;
 - c. Protection of natural environmental values;
 - d. Provision of amenity planting and public amenities; and
 - e. Efficient use of land.
333. This approach would provide certainty to developers as to the specific requirements that would need to be met to achieve the objectives relevant to each topic rather than rely on a case-by-case assessment of each subdivision. It would not avoid the need for subdivisions to obtain resource consent, as this is always required.
334. It is noted that a similar performance standard method is already provided for in the Plan, involving the application of structure plan mapped areas and associated performance standards at the time of a rezoning plan change. This approach provides for rules specific to sites, rather than applying them more widely to collections of sites as would be the case if performance standards were used with the NDMA method.
335. If performance standards were to be applied across the NDMA sites, it would require the formulation of rules that efficiently and effectively manage the issues in most circumstances. This is not easy to achieve given the range of contexts present across all sites and this would add to Plan complexity while also not being the most effective way to achieve the relevant objectives of the Plan.
336. Overall, while this method would provide certainty to developers regarding how the objectives can be achieved, this would be at the cost of plan efficiency and flexibility in responding to site-specific contexts. Flexibility is one of the overall purposes of the proposal, so this alternative is not recommended. In situations where certainty and performance standards are desirable, these can still be applied on a case-by-case basis using the existing structure plan mapped area method.

11.12.2 Alternative D1-Alt2: Assessment rules for subdivision in all areas

- 337. Alternative D1-Alt2 is to apply the new assessment rules for all topics covered in the Change D group to all subdivision, rather than just subdivision in the NDMA. This would mean that the NDMA method would not need to be added and changes instead would be made to the existing provisions for the assessment of all subdivision.
- 338. This approach would widen the matters that can be considered for all subdivision and would reduce the risk that some issues might not be appropriately managed due to a lack of discretion to do so. It would also reduce Plan complexity by avoiding the introduction of a new method.
- 339. However, this alternative would also make the assessment of smaller-scale subdivisions, especially infill subdivisions within the existing urban area, overly complex as it would require assessment of matters that are unlikely to be relevant to these types of subdivision. This would detract from Plan efficiency. It is noted that the opportunities for small infill subdivisions are expected to significantly increase as part of Change A2 and Change A3 and applying unnecessary considerations to these applications may detract from their uptake and achievement of Objective 2.6.1 on Housing choice.
- 340. Overall, the existing provisions for the assessment of all subdivision are considered adequate for subdivision outside an NDMA, except where some improvements are proposed as part of separate changes (Change D2 on transport connections, and the Change F group for 3 waters considerations).

12 CHANGES FOR TRANSPORTATION CONNECTIONS IN SUBDIVISIONS

12.1 Change D2 - Transportation Connections in Subdivisions

12.1.1 Purpose of proposal and scope of change

341. The purpose of the proposal is to review the policy framework and assessment guidance for transportation connections in new subdivisions, including considering whether it is necessary to provide improved guidance on when DCC will require new roads to be vested with the DCC. This proposal is linked to the above changes, which have an overall purpose to ensure that the subdivision of large areas of greenfield residential land is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated yet flexible way, but considers all subdivisions not just those in the a new development mapped area (NDMA) overlay.
342. The scope of the review and changes does not include a review of transportation provisions outside of those related to subdivisions including the existing performance standards in Section 6 of the Plan, such as those for parking, loading and access.

12.1.2 Background and issues of concern

343. In the strategic directions, guidance on managing transportation connectivity for residential subdivision is currently provided in Policy 2.2.2.5, which promotes energy efficiency and minimisation of transportation costs and car dependency by requiring the design of subdivision to be managed; and Policy 2.6.1.6, which promotes social connectedness and well being by requiring subdivisions to be designed to encourage walking. These strategic directions are implemented through the Section 6 provisions that apply when assessing applications for subdivision. There is some duplication within these strategic directions which is proposed to be corrected as part of this change.
344. In Section 6, assessment Rule 6.11.2.7 applies to all subdivision activities in all zones. It links to Policy 6.2.3.9, which states:
- Only allow land use and development activities or subdivision activities that may lead to land use or development activities, where:*
- a. adverse effects on the safety and efficiency of the transport network will be avoided or, if avoidance is not practicable, adequately mitigated; and*
 - b. any associated changes to the transportation network will be affordable to the public in the long term.*
345. Section 6 also contains assessment Rule 6.11.2.8 for subdivision activities that include a new road in all zones. It links to Policy 6.2.3.12, which states:
- Only allow subdivision activities that involve new roads where roads are designed to:*
- a. provide for the safe and efficient movement of vehicles, pedestrians and cyclists within the subdivision;*
 - b. provide adequate connections to surrounding areas and the wider transport network, particularly for buses, pedestrians, and cyclists; and*

- c. *use materials that provide good urban design outcomes and provide good value with respect to on-going costs to ratepayers for maintenance if the roads are to be vested in Council.*
346. There are no performance standards that require the development or vesting of roads as part of subdivision activity, other than those that are applied to specific structure plan mapped areas. Performance standards relating to vehicle access are limited by the definition of 'vehicle access', which is *"The portion of a driveway or vehicle track between the formed road and the property boundary"*, and so do not apply to roads.
347. The assessment of subdivision consents applies a matter of discretion to consider 'effects on the safety and efficiency of the transport network'. This matter, along with the assessment guidance provided in Section 6 and the policies identified above provide scope for road connections to be considered at the time of subdivision. However, improvements could be made to provide guidance on when Dunedin City Council is likely to require a new road and how it will assess connectivity between a subdivision area and adjacent land.
348. Such additional policy guidance would better guide the design of subdivision proposals and resolve issues that have occurred with some subdivision proposals including private access lots serving multiple resultant development lots, and the proliferation of cul-de-sacs which limit through-connections to adjacent land.
349. As such, Objective 2.7.1 on Efficient public infrastructure and Objective 2.7.2 on Efficient transportation could be more effectively achieved and these issues resolved prior to the addition of further greenfield residential land to the Plan.

12.1.3 Proposed change and assessment

350. Change D2 includes three main changes:
- a. changes to the strategic direction policies related to transportation considerations in subdivisions to remove duplication;
 - b. addition of policy direction on when Dunedin City Council will require a new road to be provided in Section 6, and
 - c. addition of assessment guidance related to the existing policy framework for design considerations for roads in Section 6.
351. Change D2 amends the following provisions:
- a. Amend Policy 2.2.2.4 to add a new clause x on connectivity and delete Policy 2.2.2.5.a and Policy 2.6.1.6.a to remove duplication;
 - b. Add new Policy 6.2.3.Y for assessment of subdivision and when new roads should be provided;
 - c. Amend Rule 6.11.2.7 subdivision assessment rule to reflect new policy approach; and
 - d. Amend Rule 6.11.2.8 subdivision assessment rule to reflect new policy approach.

12.1.3.1 *Relevant objectives*

352. Section 32(1)(b) of the Act requires an assessment of whether the proposed provisions (policies and methods) are the most appropriate way to achieve the objective or purpose of the proposal. Section 32(3) also requires it to be assessed against the objectives of the Second Generation Dunedin City District Plan (2GP).
353. The relevant objectives (which are provided in full in Appendix 1) have been identified as:
- a. Objective 2.7.1: Efficient public infrastructure and related objective 9.2.1; and
 - b. Objective 2.7.2: Efficient transportation and related objectives 6.2.2 and 6.2.3.
354. This assessment must:
- a. identify other reasonably practicable options for achieving the objectives;
 - b. assess the efficiency and effectiveness of the provisions in achieving the objectives, including consideration of the benefits and costs anticipated from the implementation of the provisions, and the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions; and
 - c. summarise the reasons for deciding on the provisions.

12.1.3.2 *Assessment against Objective 2.7.1 – Efficient public infrastructure*

355. The proposed changes to policies and assessment rules may result in some increased ongoing maintenance cost burdens to the public by requiring new roads to be vested in Dunedin City Council in more instances than is currently the case. However, this is a trade-off of ensuring a better connected and efficient road transport network for all road users.

12.1.3.3 *Assessment against Objective 2.7.2 – Efficient transportation*

356. The improved provisions will ensure that the road transport network operates more safely and efficiently to better achieve Objective 2.7.2. This will be achieved by enabling Dunedin City Council to require road connections from one subdivision area to adjacent land that is likely to be subject to future urban expansion. This will minimise the creation of multiple private cul-de-sacs and accessways on the urban fringes, which can prevent the efficient extension of the transport network in the future and compromise urban permeability. This in turn will improve the achievement of related objectives, such as Objective 2.2.2 on Environmental performance and energy resilience.
357. The changes will also help reduce future issues with the management of private accessways and potential demand for the Dunedin City Council to take these over. It will enable postal, rubbish and other services to access properties by way of a public road, reducing adverse safety effects from the concentration of rubbish bins at vehicle crossings for private accessways. Requirements for roads to be vested in Dunedin City Council also ensure that roads will be designed and constructed to suitable standards.
358. No practicable alternatives to the status quo or preferred option have been identified or assessed for Change D2.

13 OTHER CHANGES

13.1 Summary of changes

359. This section includes a set of relatively minor changes that were identified through the course of developing Variation 2. Most of the changes are being proposed to correct errors or to clarify existing provisions. The one more substantive change included in this section is an amendment to the definitions of ‘campground’ and ‘visitor accommodation’ to provide for longer stay accommodation as part of these activities (Change E7).

13.2 Change E1 –Residential zone descriptions

13.2.1 Purpose of proposal and scope of change

360. The purpose of this proposal is to review the residential zone descriptions in the Introduction to Section 15 to ensure the descriptions of development that is enabled by the Plan and the anticipated future residential character reflects the Plan rules for each residential zone. The scope of the change is constrained to the existing plan provisions and any changes being considered through Variation 2.
361. Note that other changes are also being proposed to the residential introduction and these are assessed under the relevant change numbers in other sections of this report.

13.2.2 Background and issues of concern

362. The residential zone descriptions are given in Section 15.1.1 of the Plan and currently generally describe the existing character and amenity of each individual zone. They do not always consider how the rules for each zone provide for change in residential character over time.
363. As the zone descriptions provide guidance to Plan users on what types of development they can expect in the residential zones, it is important to ensure the descriptions accurately reflect what is expected to occur in each zone. This is reflected in the new requirements of the National Policy Statement on Urban Development Capacity 2020 (NPS-UD) at Objective 4, Policy 6.a and subpart 7 of the NPS-UD, which must be given effect to.
364. Subpart 7 of the NPS-UD gives the following guidance on the development outcomes for zones:

Every tier 1, 2 or 3 territorial authority²⁹ must ensure that:

- (a) *the objectives for every zone in an urban environment in its district describe the development outcomes intended for the zone over the life of the plan and beyond;*
and

²⁹ Dunedin City Council is a tier 2 territorial authority.

- (b) *the policies and rules in its district plan are individually and cumulatively consistent with the development outcomes described in the objectives for each zone (Section 3.35).*

365. By not adequately describing the extent of change in character that the provisions in each residential zone are providing for, the current descriptions detract from achieving Objective 2.6.1 on Housing choices and other strategic objectives regarding urban growth. They also do not adequately support the achievement of Objective 4 of the NPS-UD regarding change in urban environments and their amenity values over time.

13.2.3 Proposed change and assessment

366. Change E1 makes amendments to the residential zone descriptions in the Section 15 Introduction to better describe the type of development enabled in the zone (and therefore the intended future character), rather than just describing the existing character.

367. The changes are to the following sub-sections of the residential zones Introduction:

- a. 15.1.1.1 General Residential 1
- b. 15.1.1.2 General Residential 2
- c. 15.1.1.3 Inner City Residential
- d. 15.1.1.4 Low Density Residential
- e. 15.1.1.5 Large Lot Residential 1
- f. 15.1.1.6 Large Lot Residential 2
- g. 15.1.1.7 Township and Settlement

13.2.3.1 Assessment against relevant objectives

368. While the proposed amendments effectively rewrite the residential zone descriptions, they are considered minor in nature as they do not amend the outcomes that are enabled for each zone. Any changes relating to substantive rule changes are addressed in other parts of this report.

369. The changes proposed will add clarity and increased certainty to plan users about the existing and future intended character and amenity of each individual zone. Therefore, it will better support achievement of Objective 2.6.1 on Housing choices and other strategic objectives regarding urban growth, and better meet the requirements of Objective 4, Policy 6.a and subpart 7 of the NPS-UD.

370. No practicable alternatives to the preferred option and status quo have been identified or assessed for Change E1.

13.3 Change E2 – Clarify the RTZ, HETZ and IndTZ provisions

13.3.1 Purpose of proposal and scope of change

371. The purpose of this proposal is to clarify how the Residential Transition Overlay Zone (RTZ), Industrial Transition Overlay Zone (IndTZ) and Harbourside Edge Transition Overlay Zone (HETZ) provisions work in the introduction to Section 12, and to clarify which zone each RTZ and IndTZ is intended to transition to. The scope of the review does not include reviewing these provisions other than as indicated in other change proposals.

13.3.2 Background and issues of concern

372. The urban land transition provisions are in Section 12 of the Plan, with mapping of the transition overlay zones provided in the planning map. These include RTZ areas that are applied to rural residential or rural zoned sites, IndTZ areas that are applied to rural zoned sites and HETZ areas that are applied to industrial zoned sites located adjacent to the Harbourside Edge Zone.
373. The Introduction to Section 12 (at Section 12.1) provides a description of how the transition provisions work to assist the Plan user. However, some clarification and expansion of this description would be helpful.
374. Furthermore, the zone to which each RTZ and IndTZ may transition is only identified in pop-ups in the planning maps. Case law has identified that pop-ups in planning maps do not form part of the rules. Furthermore, this leads to uncertainty for Plan users and inefficient Plan implementation, as there is no list of the transition zones to refer to in the Plan.
375. These issues are proposed to be addressed by Change E2.

13.3.3 Proposed change and assessment

376. Change E2 makes minor changes in the introduction to the urban land transition provisions in Section 12 for the Residential Transition Overlay Zone (RTZ), Harbourside Edge Transition Overlay Zone (HETZ) and Industrial Transition Overlay Zone (IndTZ), and adds two appendices to clarify which zone each RTZ and IndTZ is intended to transition to.
377. It makes the following changes:
- a. Amend 12.1 Introduction to expand on and clarify how the transition provisions work;
 - b. Add Appendix 12A listing RTZ transition zones; and
 - c. Add Appendix 12B listing IndTZ transition zones.

13.3.3.1 Assessment against relevant objectives

378. These changes are minor in nature and will add clarity and certainty about how the transition zones function and to which zone each RTZ and IndTZ will transition. This will ensure that Objective 2.2.4 on Compact and accessible city and Objective 2.6.2 on Adequate urban land supply can be better achieved, and the Plan can function more efficiently.

379. No practicable alternatives to the preferred option and status quo have been identified or assessed for Change E2.

13.4 Change E3 – Correct errors in RTZ, HETZ and IndTZ assessment rules

13.4.1 Purpose of proposal and scope of change

380. The purpose of this proposal is to correct errors in the assessment rules and associated provisions relating to the transition zones, as several of these are missing from the Plan or contain errors. These relate to general subdivision, cross lease, company lease, unit title subdivision, intensive farming, and forestry within the Residential Transition Overlay Zone (RTZ), Harbourside Edge Transition Overlay Zone (HETZ) and Industrial Transition Overlay Zone (IndTZ) areas.

13.4.2 Background and issues of concern

381. Policies in Section 12 set out what activities should be managed in each of the transition overlay zones to ensure these do not compromise the intended future use of the land once it transitions to the new zone provisions.
382. For the RTZ, the policies are:
- a. Policy 12.2.1.2 to avoid landfills, mining activity and other activities that may inhibit future use of the land for residential activity;
 - b. Policy 12.2.1.3 to manage forestry and intensive farming; and
 - c. Policy 12.2.1.4 to manage subdivision activity.
383. For the HETZ, Policy 12.2.2.2 is to manage subdivision activity.
384. For the IndTZ, Policy 12.2.3.2 is to manage subdivision activity.
385. These policies are intended to influence the assessment rules for these activities in the underlying zones to which the transition zones apply (which include the rural, rural residential, and industrial zones). The assessment guidance should be provided in the relevant assessment tables for 'activities in an overlay zone'.
386. It has been identified that there are some missing or incomplete assessment rules for general subdivision, cross lease, company lease, and unit title subdivision, and for intensive farming and forestry within RTZ, HETZ and IndTZ areas.
387. These missing rules relate to restricted discretionary, discretionary and non-complying assessment rules within Section 16 Rural, Section 17 Rural Residential, and Section 19 Industrial zones. Corresponding assessment rules in Section 12 are also missing.
388. An inconsistency between the Section 12 policies and the strategic direction policy that sets up this method (Policy 2.6.2.2) has also been identified.
389. A clarification to Policy 12.2.1.4 regarding subdivision in RTZs is also required to assist implementation.
390. These issues generate the potential for uncertainty for plan users as to what the relevant assessment rules for general subdivision, cross lease, company lease, unit title subdivision,

intensive farming and forestry within RTZ, HETZ and IndTZ areas are and how to apply the remaining provisions.

391. This makes it more difficult and time consuming to interpret the Second Generation Dunedin City District Plan (2GP) which could add to consenting costs and is inefficient for Plan implementation.

13.4.3 Proposed change and assessment

392. Change E3 adds missing, or makes corrections to, assessment rules and associated provisions relating to the transition zones. These relate to general subdivision, cross lease, company lease, unit title subdivision, intensive farming, and forestry within the Residential Transition Overlay Zone (RTZ), Harbourside Edge Transition Overlay Zone (HETZ) and Industrial Transition Overlay Zone (IndTZ) areas.
393. Change E3 includes the following changes:
- a. Amend Policy 2.6.2.2 to make consistent with policies in Section 12;
 - b. Amend Policy 12.2.1.4 to clarify for implementation;
 - c. Add new section 12.X.1 (introduction);
 - d. Add new Section 12.X.2 for restricted discretionary assessment rules to Section 12, with rows 1-4 for:
 - i. General subdivision in a RTZ;
 - ii. Subdivision activities in a HETZ;
 - iii. General subdivision in an IndTZ; and
 - iv. Forestry in a RTZ.
 - e. Amend Rule 12.4.2.1 Assessment of discretionary activities in a RTZ to clarify it applies prior to release of the RTZ;
 - f. Add new rows X and Y to Rule 12.4.2 Assessment of discretionary activities in a Transition Overlay Zone for:
 - i. Cross lease, company lease and unit title subdivision in a RTZ; and
 - ii. Cross lease, company lease and unit title subdivision in an IndTZ.
 - g. Amend Rule 12.5.2.1 Assessment of non-complying activities in a RTZ to clarify that it applies prior to release of the RTZ and add intensive farming to the list;
 - h. Add a new row X to Rule 12.5.2 Assessment of non-complying activities in a Transition Overlay Zone for general subdivision and cross lease, company lease and unit title subdivision in a RTZ;
 - i. Add Rule 16.10.5.X Assessment of restricted discretionary activities in an overlay zone, mapped area or affecting a scheduled item for general subdivision in a RTZ or IndTZ;
 - j. Amend header in Rule 16.11.2;

- k. Amend Rule 16.11.2.6 Assessment of discretionary land use activities in a RTZ, clarify that it applies prior to release of the RTZ and add cross lease, company lease and unit title subdivision to the list;
- l. Add Rule 16.11.2.Y Assessment of discretionary land use activities in a IndTZ prior to release for cross lease, company lease and unit title subdivision;
- m. Amend Rule 16.12.3.5 Assessment of all non-complying land use activities in a RTZ to clarify that it applies prior to release of the RTZ;
- n. Add Rule 17.10.5.X Assessment of restricted discretionary activities in an overlay zone, mapped area or affecting a scheduled item for forestry and general subdivision in a RTZ;
- o. Add Rule 17.12.3.X Assessment of non-complying land use activities for intensive farming, landfills, mining, general subdivision in RR2 Zone, and cross lease, company lease and unit title subdivision in a RTZ; and
- p. Add Rule 19.10.6.X Assessment of restricted discretionary activities in an overlay zone, mapped area or affecting a scheduled item for subdivision activities in a HETZ.

13.4.3.1 Assessment against relevant objectives

- 394. These changes will provide certainty to plan users about how subdivision, cross lease, company lease, unit title subdivision, intensive farming and forestry activities will be considered by Dunedin City Council within the RTZ, HETZ and IndTZ. This will ensure that Objective 2.2.4 on Compact and accessible city and Objective 2.6.2 on Adequate urban land supply, can be more efficiently achieved.
- 395. No practicable alternatives to the preferred option and the status quo have been identified or assessed for Change E3.

13.5 Change E4 – Duplication between Objective 2.2.2 and Objective 2.2.5

13.5.1 Purpose of proposal and scope of change

- 396. The purpose of this proposal is to remove duplication between strategic direction Objective 2.2.2 and Objective 2.2.5 and the policies underneath these objectives. It is also to clarify the wording of some of the policies under Objective 2.2.2. The purpose does not include a major review of the approach in the Plan with respect to the matters contained in these objectives and policies.
- 397. Change E4 is being done alongside Change D5, which is a more substantive change to provide greater clarity in the provisions that relate to the environmental performance of housing and this is addressed in a separate section of this report.
- 398. Change E4 is also being done alongside Change D2, which includes a minor change to the policies regarding transportation connectivity and this is also addressed in a separate section of this report.

13.5.2 Background and issues of concern

399. The following description sets out the existing provisions that are being changed and identifies where there is overlap and duplication.

400. Objective 2.2.2 'Energy resilience' is:

Dunedin reduces its reliance on non-renewable energy sources and is well equipped to manage and adapt to changing or disrupted energy supply by having:

- a. increased local renewable energy generation;*
- b. reduced reliance on private motor cars for transportation;*
- c. increased capacity for local food production; and*
- d. housing that is energy efficient.*

401. Underlying Policy 2.2.2.4 and Policy 2.2.2.5 (those being amended by this change) are:

<i>Policy 2.2.2.4</i>	<i>Support transport mode choices and reduced car dependency through policies and rules that:</i> <i>a. restrict the location of activities that attract high numbers of users, and to which access by a range of travel modes is practicable, to where there are several convenient travel mode options, including private vehicles, public transport, cycling and walking;</i> <i>b. encourage new community facilities to locate where there are several convenient travel mode options, including private vehicles, public transport, cycling and walking, unless there are specific operational requirements that make this impracticable;</i> <i>c. allow the highest development densities in the most accessible locations, being in the central city and suburban centre zones;</i> <i>d. use existing access to public transport, or the ability to be serviced by public transport in the future, as a criterion for determining appropriate locations for new residential and medium density zones; and</i> <i>e. provide for dairies and registered health practitioners in residential zones to meet day to day needs, in a way that does not undermine Objective 2.3.2.</i>
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<i>Policy 2.2.2.5</i>	<i>Encourage the development of new housing that is durably constructed and energy efficient to operate, and located to minimise, as far as practicable, transportation costs and car dependency by:</i> <i>a. managing the design of subdivision to promote connectivity and legibility and maximise accessibility by transportation modes other than private motor cars; and</i> <i>b. managing subdivision, and building and site design to maximise solar access and the environmental performance of buildings.</i>
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402. Objective 2.2.5 'Environmental performance' is:

Development in the city is designed to reduce environmental costs and adverse effects on the environment as much as practicable, including energy consumption, water use, and the quality and quantity of stormwater discharge.

403. Underlying policies 2.2.5.1 to 2.2.5.3 are:

<i>Policy 2.2.5.1</i>	<i>Encourage small scale renewable energy generation through policies and rules that provide for these activities where they are of an appropriate scale, design and location.</i>
<i>Policy 2.2.5.2</i>	<i>Enable and encourage onsite stormwater and wastewater management, where this would not endanger groundwater and is not in conflict with the efficient use of existing public, wastewater and stormwater infrastructure, through rules that provide for an alternative to connecting to public water supply, wastewater and stormwater infrastructure.</i>
<i>Policy 2.2.5.3</i>	<i>Encourage improvements to the environmental performance of new housing by:</i> <i>a. assessment rules that consider the layout of subdivision and development in terms of solar orientation;</i> <i>b. encouraging new medium density housing in parts of the city that have old housing stock that is not protected for its heritage values;</i> <i>c. rules that require outdoor living space to be on the sunny side of buildings, and requiring principal living areas to connect to the outdoor living space; and</i> <i>d. rules that restrict height in relation to boundary to facilitate access to sunlight in outdoor areas.</i>

404. There is some duplication in the intended outcomes for Objective 2.2.2 and Objective 2.2.5 and their underlying policies referenced above, as they both deal with matters broadly

relating to environmental performance. Table 14 sets out the duplication and overlap between the two sets of provisions and summarises how they are proposed to be resolved.

Table 14: Summary of changes to Section 2.2.2 & Section 2.2.5 to resolve duplication

Environmental matter	Section 2.2.2 content	Section 2.2.5 content	Proposed Change
Local food production	Objective 2.2.2; Policy 2.2.2.1; Policy 2.2.2.2	Objective 2.2.5 (reduce environmental costs)	Merge Objective 2.2.5 into Objective 2.2.2
Local renewable energy generation	Objective 2.2.2; Policy 2.2.2.3	Objective 2.2.5; Policy 2.2.5.1	Merge Objective 2.2.5 into Objective 2.2.2; Delete Policy 2.2.5.1 and rely on Policy 2.2.2.3
Energy consumption and energy efficiency (including for housing)	Objective 2.2.2; Policy 2.2.2.5	Objective 2.2.5; Policy 2.2.5.3	Merge Objective 2.2.5 into Objective 2.2.2; Delete Policy 2.2.2.5; Delete Policy 2.2.5.3; Add new Policy 2.2.2.X
Stormwater, wastewater, and water discharge, use and quality	N/A	Objective 2.2.5; Policy 2.2.5.2	Merge Objective 2.2.5 into Objective 2.2.2; See also Change F1-6 & Change F2-2
Reduced reliance on private motor cars	Objective 2.2.2; Policy 2.2.2.4; Policy 2.2.2.5	Objective 2.2.5	Merge Objective 2.2.5 into Objective 2.2.2; Add clause Policy 2.2.2.4.x; Delete Policy 2.2.2.5

405. The duplication between the two sets of provisions identified above adds to Plan complexity, detracts from Plan efficiency, and should be rectified.

13.5.3 Proposed change and assessment

406. Change E4 merges Objective 2.2.5 into Objective 2.2.2. It also merges the policies under Objective 2.2.2 into policies under objective 2.2.5 either into an existing policy or into a new

policy. It also removes duplication by deleting some policy content under Objective 2.2.2 and 2.2.5 as part of the merging of provisions.

407. Change E4 includes the following changes:

- a. Amend Objective 2.2.2;
- b. Amend Policy 2.2.2.4;
- c. Delete Policy 2.2.2.5;
- d. Add new Policy 2.2.2.X;
- e. Delete Objective 2.2.5;
- f. Delete Policy 2.2.5.1;
- g. Delete Policy 2.2.5.3; and
- h. Amend Policy 2.6.2.3 (consequential).

13.5.3.1 *Assessment against relevant objectives*

408. Change E4 will ensure that Objective 2.2.2 on Energy resilience can be better achieved by improving Plan efficiency.

13.5.3.2 *Assessment of changes to Objective 2.2.2 & Objective 2.2.5 against the purpose of the Act*

409. The proposed merging of Objective 2.2.5 into Objective 2.2.2 will not make any substantive difference to how the purpose of the Act will be achieved, as it is simply a translocation of provisions. As such, the proposed change will continue to achieve the purpose of the Act in the same way the status quo does.

410. No practicable alternatives to the preferred option and status quo have been identified or assessed for Change E4.

13.6 Changes E6 – Policy on the application of overlays at the time of plan changes to rezone land

13.6.1 Purpose of proposal and scope of change

411. The purpose of the proposal is to assess the need to add a new policy to the strategic directions to encourage the consideration of application of overlay zones and mapped areas as part of plan changes for new residential or rural residential zoning.

13.6.2 Background and issues of concern

412. The strategic policies describe methods which are used in the plan to achieve the strategic objectives. This includes the method of applying various mapped areas and overlay zones to manage specific issues or values.

413. The following strategic policies set up the use of overlay zones and mapped areas, some of which can be applied to residential zoned land, and most of which can be applied to rural residential zoned land:

- a. Policy 2.2.1.3, Policy 2.2.1.4, and Policy 2.2.1.5 regarding overlay zones and mapped areas to manage natural hazards;
 - b. Policy 2.2.2.1 and Policy 2.3.1.10 regarding the high class soils mapped area;
 - c. Policy 2.2.3.1 and Policy 2.2.3.2 regarding areas of significant biodiversity value;
 - d. Policy 2.2.3.5 regarding the urban biodiversity mapped area;
 - e. Policy 2.2.4.1 and Policy 2.6.1.7 regarding structure plan mapped areas;
 - f. Policy 2.4.4.1 and Policy 2.4.4.2 regarding overlay zones for outstanding natural features, outstanding natural landscape, and significant natural landscape;
 - g. Policy 2.4.5.1 and Policy 2.4.5.2 regarding overlay zones for outstanding natural coastal character, high natural coastal character and natural coastal character;
 - h. Policy 2.5.3.1 and Policy 2.5.4.1 regarding the wāhi tūpuna mapped area; and
 - i. Policy 2.6.2.3 regarding infrastructure constraint mapped area.
414. However, not all mapped areas and overlay zones have a specific policy regarding their application in the strategic policies. Furthermore, there is no overarching policy directing the consideration and application of mapped areas or overlay zones as part of the rezoning process for new residential or rural residential zoned land.
415. While the lack of a single policy does not get in the way of overlays being considered at the time of a plan change for new residential or rural residential zoning, it is considered that a policy about when and how overlays should be used will provide greater clarity and transparency for Plan users.

13.6.3 Proposed change and assessment

416. Change E6 adds a new Policy 2.6.2.AA to guide the consideration of applying overlays and mapped areas at the time of plan changes to rezone land, as follows:
- Ensure that any plan change that proposes a new residential zoning area (in accordance with Policy 2.6.2.1) or a new rural residential zoning area (in accordance with policies 2.6.1.3 to 2.6.1.5) best achieves the objectives of this Plan by application of any necessary overlay zones or mapped areas (including **structure plan mapped areas** and/or **new development mapped areas**) and related provisions as part of the plan change, including where necessary to:*
- a. *manage risks or effects (for example relating to natural hazards or network utilities);*
 - b. *manage constraints within or beyond the area (for example relating to reverse sensitivity); or*
 - c. *protect values (for example relating to coastal character, landscape, or biodiversity).*
417. Note that the reference to the new development mapped area is considered separately under Change D1, and the reference to structure plan mapped area is considered separately under Change E5.

418. Overall, the proposed new Policy 2.6.2.AA will provide greater certainty and clarity for plan users about how any necessary overlay zones or mapped areas should be applied when rezoning to a residential zone or rural residential zone. This is not a substantive change in that it is not necessary to have a policy for overlays and mapped areas to be applied, but it is considered generally helpful and more efficient to include this policy.
419. No practicable alternatives to the preferred option and status quo have been identified or assessed for Change E6.

13.7 Change E7 – Long stay areas for people living in transportable homes

13.7.1 Purpose of proposal and scope of change

420. The purpose of the proposal is to consider how to provide for people to live in transportable homes including caravans, house buses and ‘tiny houses’ as a form of long-stay accommodation. Within the scope of this change is whether there needs to be any different methods for managing the potential effects of long-stay facilities for people living in transportable homes and whether a different method to provide for them is more appropriate. It is noted that Change F5 considers separately the management of 3 waters infrastructure with respect to visitor accommodation.

13.7.2 Background and issues of concern

421. Long-term occupation of caravans, buses or transportable tiny homes within commercial campground facilities as an alternative to standard residential activity is currently not provided for within the Plan provisions. However, this activity has been undertaken in locations such as the campground adjacent to the Mosgiel Pool and in other locations, either as a lifestyle choice or as a necessity when people cannot access other forms of housing.
422. Census data for Dunedin City shows that the number of ‘other dwellings’ (which includes caravans, mobile homes, improvised dwellings or shelters and people sleeping rough) has almost doubled between the 2013-2018 census periods (126 at the 2013 census to 246 at the 2018 census).³⁰ This represents 0.5% of the total number of occupied private dwellings in the city.
423. Consultation with the community through the Planning for Housing Survey in late-2019 also identified that there is some demand for the ability to occupy land in ‘tiny homes’ or ‘alternative living’ options as a lifestyle choice.
424. Campgrounds are currently defined as:

Campgrounds

The use of land and buildings for the purpose of providing visitor accommodation primarily in the form of tent, caravan, or campervan sites, but may also include visitor accommodation units.

³⁰ New Zealand Census of Population and Dwellings, Statistics New Zealand (2018).

This definition excludes freedom camping which is managed through a DCC bylaw.

Campgrounds are a sub-activity of visitor accommodation.

425. Visitor accommodation is defined as:

Visitor Accommodation

The use of land and buildings for temporary accommodation (up to three months stay within any calendar year period per customer) on a commercial fee paying basis. For the sake of clarity, this definition includes the provision of facilities for resident guests (e.g. playgrounds, spa pools, swimming pools, gyms)

Examples are:

- *motels*
- *hotels*
- *homestays or bed and breakfasts*
- *serviced apartments; and*
- *backpackers and hostels.*

This definition excludes accommodation activities that meet the definitions of working from home or standard residential. Freedom camping is not managed by this Plan and is managed through a DCC bylaw.

Campgrounds are managed as a sub-activity of visitor accommodation.

Visitor accommodation is an activity in the commercial activities category.

426. An issue is that, as a type of visitor accommodation, campgrounds are intended only for occupation for up to three months within a calendar year per customer, but they are sometimes being occupied for longer than this, including on a semi-permanent basis.
427. The activity status for campgrounds varies in the Plan from permitted through to prohibited depending on the zone in which they will be located. Where campgrounds are discretionary or non-complying, Dunedin City Council can consider any matters in assessing a resource consent and no performance standards apply. This is the case in the Rural zones, Rural Residential zones, Industrial zones, most of the Major Facilities zones, and where in an ASBV in the Recreation Zone.
428. Where visitor accommodation (VA) is a permitted or restricted discretionary activity, performance standards apply, and the specified matters of discretion apply to restricted discretionary activities. This is set out in Table 15.

Table 15: How visitor accommodation and campgrounds activities are currently managed in the Plan

Section	Activity	Activity Status ³¹	Specific Performance Standards	Matters of discretion
15 Residential	VA in the George St Nth residential heritage precinct	P	Density	N/A
	VA elsewhere	RD	Density Min. car parking Min. vehicle loading	Effects on surrounding sites' residential amenity
18 CMU ³²	VA	P (CBD/ RC/ NEDC)	Min. car parking Min. vehicle loading	N/A
		RD (NECC/ NEC)		Effects on residential amenity
20 Recreation	Campgrounds	RD (Rec & NCC)	Min. car parking	Effects on amenity of surrounding sites
		NC (ASBV)	N/A	N/A
	All other activities	NC/NC+	N/A	N/A
24 DI Airport ³³	VA	P	Min. car parking Min. vehicle loading	N/A

429. It is noted that some changes to the activity status of visitor accommodation may be made through the resolution of 2GP appeals for the Campus Zone and within the hazardous facilities mapped area. It is also noted that the NPS-UD requires the removal of all minimum car parking standards by the 20th February 2022.

430. It is further noted that an additional matter of discretion for 'effects on efficiency and affordability of infrastructure' is proposed to be added through Change F5 and this is assessed separately in this report.

431. Overall, the current approach of not having a clear set of provisions that apply to long-stay areas for transportable homes not only creates confusion as to the status of these activities,

³¹ P= permitted; RD = restricted discretionary; CBD = Central Business District Zone; RC = Rural Centre Zone; NEDC = Neighbourhood Destination Centre Zone; NECC = Neighbourhood Convenience Centre Zone; NEC = Neighbourhood Centre Zone; Rec = Recreation Zone; NCC = Natural Coastal Character Overlay Zone; NC = non-complying; ASBV = Area of Significant Biodiversity Value.

³² CMU = commercial and mixed use zones

³³ DI Airport = Dunedin International Airport

it also does not effectively provide for this activity, which should be considered as one means of ensuring Objective 2.6.1 on Housing choice is achieved.

13.7.3 Proposed change and assessment

- 432. Change E7 makes changes to the plan to include provision for long-stay areas for people living in transportable homes within the definition of campgrounds and a related change to the definition of visitor accommodation.
- 433. This change will ensure that long-stay accommodation in transportable housing clearly fits into the activity definitions. It is considered that the existing policy and rule framework should be adequate to manage any adverse effects from long stay facilities as these are likely to be similar to short stay facilities. The only exception to this is with respect to effects on infrastructure and a separate change is proposed to address this. This is discussed against Change F5.
- 434. Change E7 makes the following changes:
 - a. Amend the definition of 'campgrounds' to clarify that these activities can include long-stay accommodation for transportable homes in the form of caravans, house buses/trucks or 'tiny houses'; and
 - b. Amend the definition of 'visitor accommodation' to remove the time limit for visitors of 'up to three months stay within any calendar year period per customer'.

13.7.3.1 Assessment against Objective 2.6.1 – Housing choice

- 435. These amendments will ensure that long-stay accommodation in transportable homes will fall into the activity definitions for campgrounds and visitor accommodation. This will provide a clear consenting pathway for facilities where these activities are intended to occur and will enable them to be established for provision of affordable alternative housing. Overall, this will ensure that Objective 2.6.1 can be better achieved by providing for a wider variety of housing choices, including alternatives to traditional forms of residential activity.

13.7.3.2 Assessment against Objective 2.7.1 – Efficient infrastructure

- 436. As noted in the background above, campgrounds in the Rural zones, Rural Residential zones, Industrial zones, most of the Major Facilities zones, and where in an ASBV in the Recreation Zone are either discretionary or non-complying activities. As such, infrastructure effects can be assessed as part of the resource consenting process. This will not change as a result of this proposal, so it is considered that it will ensure that Objective 2.7.1 continues to be achieved in these circumstances.
- 437. In the Residential zones, visitor accommodation is either a permitted or restricted discretionary activity and the performance standard for density applies. However, as assessed separately under Change F5, it is proposed to amend how the plan manages visitor accommodation in the Residential zones in terms of demand for wastewater and water supply. The amendment adds 'effects on efficiency and effectiveness of infrastructure' as a matter of discretion for restricted discretionary visitor accommodation rather relying on the density performance standard. Overall, this approach will ensure that Objective 2.7.1 continues to be achieved for campgrounds in the Residential zones.

438. In the remaining zones where campgrounds or visitor accommodation are permitted or restricted discretionary activities (CMU, Recreation, and DI Airport zones) there is no mechanism by which effects on 3-waters public infrastructure is currently managed (no performance standard or assessment matter). However, in the CMU zones, a high density of development is anticipated and planned for as part of 3-waters infrastructure planning (e.g. there is no density performance standard for residential activity either). Furthermore, given the relatively high land value and level of existing development in areas subject to CMU zoning, it is considered unlikely that campgrounds would be proposed in these locations. For the Recreation and DI Airport zones, these zones are not serviced with 3-waters public infrastructure. This is proposed to be reinforced as part of Change F3-3, which proposes a new definition for 'wastewater serviced area' (and is assessed separately in this report). As such, no effects on 3-waters public infrastructure are expected from any campgrounds that might be proposed in these locations in the future.
439. Overall, it is considered that Objective 2.7.1 on Efficient infrastructure will continue to be achieved as part of the proposed changes.
440. No practicable alternatives to the preferred option and status quo have been identified or assessed as part of Change E7.

13.8 Change E10 – Corrections to assessment of structure plan standards

13.8.1 Purpose of proposal and scope of change

441. The purpose of the proposal is to add missing aspects of the existing structure plan mapped area standards.

13.8.2 Background and issues of concern

442. Performance standards specific to structure plan mapped areas are set out in Section 15.8 of the Plan. These are linked to from the activity status tables at Section 15.3 to ensure they apply to all relevant activities in the structure plan mapped areas. However, for subdivision, the link is only included for general subdivision in Rule 15.3.5.2, but not for cross lease, company lease and unit title subdivision in Rule 15.3.5.1. This was omitted in error and the link needs to be added to ensure the effective operation of the Plan.
443. In addition, the assessment rule for non-complying contravention of the structure plan mapped area performance standards (Rule 15.13.5.5) currently only references Objective 2.4.1 on the Form and structure of the environment and Policy 2.4.1.8 as the relevant objectives and policies (priority considerations). However, these are not the only considerations, as performance standards in structure plan mapped areas apply to a wide range of matters, not just form and structure of the environment. The assessment guidance needs to be amended to reflect the broad range of considerations that might be needed to ensure the effective and efficient operation of the Plan.

13.8.3 Proposed change and assessment

444. Change E10 adds the missing link to the structure plan performance standards for cross lease, company lease and unit title subdivision in structure plan mapped areas in the

residential activity status table and corrects the assessment rule for non-complying contravention of structure plan mapped area performance standards.

445. Change E10 includes the following changes:

- a. Amend Rule 15.3.5.1 Subdivision Activity Status Table for Cross lease, company lease and unit title subdivision; and
- b. Amend Rule 15.13.5.5 Assessment of non-complying performance standard contraventions for structure plan mapped area performance standards.

13.8.3.1 *Assessment against relevant objectives*

- 446. The proposal will ensure the structure plan mapped area performance standards apply to all types of subdivision, which was what was intended. This will ensure the relevant objectives of the Plan are effectively achieved in each case and remove the risk that cross lease and other types of subdivision are used to subvert the performance standards for structure plans.
- 447. The proposed changes will also improve the guidance for assessment of the non-complying contraventions of the structure plan mapped area performance standards because it will encourage Plan users to consider the full range of provisions that are relevant to the proposal and contravention. This will improve the effectiveness of Plan implementation with respect to achieving the objectives that are relevant to each proposal.
- 448. No practicable alternatives to the preferred option and status quo have been identified or assessed for Change E10.

14 GENERAL CHANGES TO 3 WATERS PROVISIONS

14.1 Introduction

449. This section describes and assesses changes proposed for provisions that overarch multiple 3 waters considerations relating to residential land use, development and subdivision, being Change F1-2, Change F2-6, and Change F5.
450. Changes that relate only to individual 'waters' or minor changes are considered under separate sections later in this report.

14.2 Relevant objectives

451. Section 32(1)(b) of the Act requires an assessment of whether the proposed provisions are the most appropriate way to achieve the objectives or purpose of the proposal. Section 32(3) also requires the proposal to be assessed against the objectives of the Second Generation Dunedin City District Plan (2GP).
452. The relevant objectives (which are provided in full in Appendix 1) have been identified as:
- a. Objective 2.6.1 Housing choices;
 - b. Objective 2.6.2 Adequate urban land supply; and
 - c. Objective 2.7.1 Efficient public infrastructure and related Objective 9.2.1.
453. This assessment must:
- a. identify other reasonably practicable options for achieving the objectives;
 - b. assess the efficiency and effectiveness of the provisions in achieving the objectives, including consideration of the benefits and costs anticipated from the implementation of the provisions, and the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions; and
 - c. summarise the reasons for deciding on the provisions.

14.3 Change F1-2 – Review of 3 waters Policy 9.2.1.1, Policy 9.2.1.4 and Policy 9.2.1.6

14.3.1 Purpose of proposal and scope of change

454. The purpose of this proposal is to review and clarify the 3 waters policy framework in Policy 9.2.1.1, Policy 9.2.1.4 and Policy 9.2.1.6.

14.3.2 Background and issues of concern

455. Objective 9.2.1 states:
- Land use, development and subdivision activities maintain or enhance the efficiency and affordability of public water supply, wastewater and stormwater infrastructure.

456. Policy 9.2.1.1 states:

Only allow land use or subdivision activities that may result in land use or development activities where:

- a. in an area with public water supply and/or wastewater infrastructure, it will not exceed the current or planned capacity of that infrastructure or compromise its ability to service any activities permitted within the zone; and*
- b. in an area without public water supply and/or wastewater infrastructure, it will not lead to future pressure for unplanned expansion of that infrastructure.*

457. Policy 9.2.1.4 states:

Only allow supported living facilities where public water supply, wastewater and stormwater infrastructure has capacity and where this would not compromise the capacity required for any future permitted activities within the zone.

458. The following issues have been identified in policies 9.2.1.1 and 9.2.1.4:

- a. The current policy framework makes it difficult to apply only parts of the policy test to relevant activities based on the individual 'water' or whether an area is serviced or not serviced by the DCC;
- b. Policy 9.2.1.1 does not explicitly reference effects on the stormwater network, although the matter of discretion for relevant activities (e.g. subdivision) is broad ("effects on efficiency and affordability of Infrastructure") and enables consideration of stormwater; and
- c. The policies do not provide enough guidance on acceptable options to manage effects on 3 waters infrastructure. For wastewater and water supply, such options include agreements with the DCC to undertake an unplanned extension or upgrade to the public infrastructure network to resolve capacity issues. For wastewater, another option includes the use of communal on-site wastewater detention tanks to support the demands of controlled and restricted discretionary land use activities (which are activities that are provided for within the relevant zones and should have some expectation of being able to be undertaken when the proposal appropriately mitigates adverse effects).

459. These issues mean that the policy framework is likely to be ineffective in achieving Objective 9.2.1, and in turn Objective 2.7.1 on Efficient Infrastructure. The current framework may also limit the effectiveness in achieving Objective 2.6.1 on Housing choice and Objective 2.6.2 on Adequate urban land supply by discouraging developers from pursuing development where public infrastructure is insufficient or not yet available but where solutions may be possible.

460. The need for these improvements is also linked to the inclusion of new areas of residential zoned land in Variation 2 and areas of greenfield land that have been added through the 2GP (including through resolution of appeals).

14.3.3 Proposed change and assessment

461. Change F1-2 amends Policy 9.2.1.1 and Policy 9.2.1.4 so they are split into separate policies for each 'water' and depending on whether the area is serviced with public infrastructure or

not. It also provides explicit options for mitigation to better enable the policies to be met and deletes Policy 9.2.1.6 to rely on the new policy for serviced wastewater areas.

462. Change F1-2 includes the following changes:

- a. Amend Policy 9.2.1.1 so it is only about areas not serviced for wastewater;
- b. Add Policy 9.2.1.1A on areas serviced for wastewater;
- c. Replace Policy 9.2.1.4 with new wording only about areas with public water supply;
- d. Add Policy 9.2.1.4A on areas without public water supply;
- e. Delete Policy 9.2.1.6;
- f. Consequential changes to add or amend policy references in relevant assessment rules (rules 9.4.1.1, 9.5.3.3, 9.5.3.X, 9.5.3.AA, 9.6.2.Z, 9.6.2.2, 9.7.4.2, 9.7.4.3, 9.7.4.4, 9.8.2.2, and 9.8.2.5);
- g. Add new assessment Rule 9.6.2.Z for all restricted discretionary activities that have 'effects on efficiency and affordability of infrastructure' as a matter of discretion; and
- h. Delete assessment Rule 9.6.2.4 on all subdivision.

463. It is noted that new policies regarding stormwater management are proposed as a part of separate changes under Change F2 and are not considered in this section.

14.3.3.1 *Assessment against Objective 2.7.1 – Efficient Infrastructure*

464. Objective 2.7.1 seeks for public infrastructure networks to operate efficiently and effectively and have the least possible long term cost burden on the public. By splitting out Policy 9.2.1.1 and Policy 9.2.1.4 into four separate policies about the effects of activities on wastewater and water supply public infrastructure (and whether they are in a serviced area or not), the policies can contain more specific content for each scenario and these can be targeted to the assessment of relevant activities. This will help ensure that Objective 2.7.1 can be efficiently achieved in each specific situation.

465. By introducing more explicit clauses on methods to mitigate effects on the public infrastructure networks for wastewater and water supply, applicants will be encouraged to fully consider the range of options that may be acceptable to ensure Objective 2.7.1 is achieved. Of note, the policies now provide the option of working with the DCC to reach agreement on the implementation of unplanned extensions and upgrades to the public infrastructure network, which would include consideration of the relative costs covered by the developer and the public and assist in achieving Objective 2.7.1 and related Objective 9.2.1.

14.3.3.2 *Assessment against Objective 2.6.1 – Housing Choice*

466. The changes that add clauses on methods to mitigate effects on public infrastructure will assist in the provision of new housing that requires consent as a restricted discretionary activity (such as supported living facilities or medium density social housing). These activities are provided for in the residential zones through restricted discretionary activity status (see Change C for social housing), so it is necessary to provide for effects on the 3 waters network

to be mitigated to enable these consents to be granted. Overall, this will enable Objective 2.6.1 to be better achieved by supporting the provision of these types of housing.

467. No practicable alternatives to the preferred option and status quo have been identified or assessed as part of Change F1-2.

14.4 Change F2-6 – Provision of 3 waters connections to adjacent land

14.4.1 Purpose of proposal and scope of change

468. The purpose of the proposal is to consider whether and how Policy 2.7.1.2.d should be implemented within the lower-order Plan provisions, as it is currently not implemented.

14.4.2 Background and issues of concern

469. Policy 2.7.1.2.d states:

Ensure areas of new urban development provide for public infrastructure networks that represent the least possible long term cost to the public through...assessment rules that require consideration of additional public infrastructure capacity to provide for future urban development on adjoining or nearby sites.

470. There are currently no assessment rules for subdivision which provide for this assessment to take place. With the addition of significant areas of new greenfield residential zoning, there is a risk that individual subdivisions will not consider or provide for the connection of public infrastructure from one area to another to enable the development of efficient public infrastructure. As such, the current provisions may be ineffective in achieving Objective 2.7.1.

14.4.3 Proposed change and assessment

471. Change F2-6 adds a new policy (Policy 9.2.1.AA) to assist the assessment of subdivision in a new development mapped area (NDMA) with regard to how new 3 waters infrastructure will provide for connections to adjoining subdivision areas where necessary to support future urban expansion.

472. Change F2-6 makes the following changes:

- a. Add new Policy 9.2.1.AA;
- b. Refer to Policy 9.2.1.AA in new assessment Rule 9.5.3.Z for stormwater service connections in an NDMA; and
- c. Refer to Policy 9.2.1.AA in new assessment Rule 9.6.2.X for all subdivision in an NDMA.

14.4.3.1 Assessment against Objective 2.7.1- Efficient Infrastructure

473. The addition of the new policy and reference to it in assessment rules relating to subdivision in a new development mapped area will ensure that the connection of 3 waters infrastructure from one subdivision area to areas of future urban development will be considered as part of assessing applications. This will enable the size and location of this infrastructure to be designed to support urban expansion and minimise costs to ratepayers into the long term.

- 474. Any additional costs to the developer of designing infrastructure to benefit future areas of development can be dealt with by agreement with the DCC through the development process.
- 475. In applying these provisions only to the new development mapped area, subdivisions of a scale and location that are more likely to need to connect with future areas of urban expansion will be captured.
- 476. Overall, the proposal will support the efficient and effective achievement of Policy 2.7.1.2.d and Objective 2.7.1 on Efficient infrastructure.

14.4.4 Alternative F2-6-Alt1: Provision of 3 waters connections to adjacent land for all subdivision

- 477. Alternative F2-6-Alt1 is to make the assessment of 3 waters infrastructure connectivity apply to all subdivision, including that not in a new development mapped area.
- 478. This alternative could provide benefits in terms of ensuring public infrastructure connectivity is achieved in instances where this can only be achieved through an area which is not subject to the new development mapped area.
- 479. However, this option would also potentially impose costs on small-scale and infill subdivision which would detract from achieving Objective 2.6.1. on Housing choice and Objective 2.6.2 on Adequate urban land supply. Overall, it is considered that the costs of this alternative would outweigh the potential benefits.

14.5 Change F5 – 3 waters management for visitor accommodation

14.5.1 Purpose of proposal and scope of change

- 480. The purpose of this proposal is to review the plan provisions with respect to visitor accommodation in the residential zones and its potential effects on 3 waters infrastructure. The proposal specifically considers whether these issues are best managed via the performance standard for density (Rule 15.5.2) or through an assessment matter.

14.5.2 Background and issues of concern

- 481. The definition of visitor accommodation includes a wide range of accommodation types including hotels, motels, backpackers, owner occupied bed and breakfast establishments that are beyond the allowance for these activities as part of standard residential activity, campgrounds and Air B&B type rentals.
- 482. Visitor accommodation in the residential zones is a restricted discretionary activity in all locations except for in the George Street North residential heritage precinct where it is permitted. The matters of discretion are restricted to “effects on surrounding sites’ residential amenity”.
- 483. Currently, effects on 3 waters from visitor accommodation in the residential zones are managed via a performance standard for density (Rule 15.5.2) in order to achieve Objective 2.7.1 on Efficient infrastructure.
- 484. It is considered that measuring visitor accommodation density in residential units per site area (all zones except for GR2 and Inner City Residential Zone (ICR)) and in habitable rooms

per site area (for GR2 and ICR zones only) does not work well. This is because visitor accommodation cannot be measured in terms of residential units (because it is excluded from the definition of residential units) and some types of visitor accommodation are not easy to measure in terms of 'habitable rooms' (e.g. campgrounds). Furthermore, visitor accommodation does not equate to the same impact on 3 waters infrastructure as standard residential activity, especially due to fluctuations in occupancy. For example, three visitor accommodation units (motel units) is unlikely to have the same effect as three houses used for standard residential activity.

485. Therefore, this standard is considered inefficient and ineffective at ensuring Objective 2.7.1 is met while enabling visitor accommodation in appropriate locations in the residential zones.

14.5.3 Proposed change and assessment

486. The preferred option is to amend how 3 waters effects are managed for visitor accommodation in the residential zones by adding a new matter of discretion for 3 waters infrastructure and removing application of the density performance standard (other than for where visitor accommodation is a permitted activity).

487. Change F5 includes the following changes:

- a. Add new assessment Rule 9.6.2.Z for restricted discretionary activities with 'effects on efficiency and affordability of infrastructure (wastewater and water)' as the matter of discretion, to apply to RD visitor accommodation activity;
- b. Amend Rule 15.3.3.22 land use activity status table for visitor accommodation so that the density performance standard no longer applies;
- c. Amend Rule 15.5.2 density performance standard to clarify that it only applies in the George Street North residential heritage precinct (where visitor accommodation is a permitted activity); and
- d. Amend assessment Rule 15.11.2.7 for visitor accommodation to add a new matter of discretion for 'effects on efficiency and affordability of infrastructure'.

14.5.3.1 Assessment against Objective 2.7.1 – Efficient Infrastructure

488. This option is considered more efficient and effective at ensuring Objective 2.7.1 is met while enabling visitor accommodation in appropriate locations in the residential zones. This is because the change does not amend the activity status to create a more difficult consenting hurdle for visitor accommodation but still allows it to be considered on a case by case basis with respect to effects on 3 waters infrastructure. This will continue to enable visitor accommodation at a scale appropriate to its location, while also enabling the permitted baseline of residential permitted density to be considered as appropriate.
489. No other practicable options have been identified or assessed in addition to the status quo and the preferred option for Change F5.

15 STORMWATER PACKAGE

15.1 Summary and overall purpose of proposal and scope of change

490. The purpose of this proposal is to improve the provisions in the Plan that ensure any actual or potential adverse effects of changes to stormwater arising from development are appropriately managed. This includes managing effects on both private and public stormwater systems and where stormwater may directly or indirectly lead to flood hazards elsewhere, including by considering how change in land use or subdivision may lead to development that creates stormwater effects.
491. The need for these improvements arises, in part, from the rule changes and rezoning being proposed as part of Variation 2, and from greenfield rezoning that may be agreed as part of the resolution of appeals on the Second Generation Dunedin City District Plan (2GP). Together, these proposals will alter the nature and scale of anticipated stormwater effects across the city due to residential intensification and expansion and this needs to be considered carefully in the context of uncertain, but sometimes significant, constraints in the system of public and private stormwater infrastructure.
492. An overview of existing constraints in stormwater public infrastructure is provided in Section 4.3 of this report.
493. The proposals assessed in this section (being Changes F2-1, F2-2, F2-3, F2-5, and F2-7) improve provisions which manage stormwater with respect to:
- a. Stormwater management plans and on-site stormwater management to support the subdivision and development of large new greenfield residential areas (Change F2-2);
 - b. Guidance on assessment of stormwater effects arising from subdivision, supported living facilities, multi-unit development, and contravention of the impermeable surfaces performance standard within the existing urban area (Change F2-3 and Change F2-5);
 - c. Impermeable surface limits where there are known stormwater infrastructure constraints (Change F2-7); and
 - d. Connections to stormwater infrastructure at the time of subdivision (Change F2-1).
494. Alternatives to the changes assessed in this section are addressed in Section 15.8 below.

15.2 Relevant objectives

495. Section 32(1)(b) of the Act requires an assessment of whether the proposed provisions are the most appropriate way to achieve the objectives or purpose of the proposal. Section 32(3) also requires the proposal to be assessed against the objectives of the 2GP. In this case the purpose of the proposal is also reflected in the objectives of the 2GP so the assessment has focused on an evaluation against those objectives.
496. The relevant objectives (which are provided in full in Appendix 1) have been identified as:
- a. Objective 2.2.1 Risk from natural hazards and related Objective 11.2.1;

- b. Amended Objective 2.2.2 Environmental performance and energy resilience (and Objective 2.2.5 Environmental performance which it replaces) and related Objective 9.2.1;
- c. Objective 2.6.1 Housing choices;
- d. Objective 2.6.2 Adequate urban land supply; and
- e. Objective 2.7.1 Efficient public infrastructure and related Objective 9.2.1.

497. This assessment must:

- a. identify other reasonably practicable options for achieving the objectives;
- b. assess the efficiency and effectiveness of the provisions in achieving the objectives, including consideration of the benefits and costs anticipated from the implementation of the provisions, and the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions; and
- c. summarise the reasons for deciding on the provisions.

15.3 Change F2-1 – Performance standard for connections to stormwater

15.3.1 Purpose of proposal and scope of change

498. The purpose of the proposal is to reconsider whether it is appropriate to require connections to stormwater infrastructure through the service connections performance standard for subdivision (Rule 9.3.7).

15.3.2 Background and issues of concern

499. The current performance standard for service connections (Rule 9.3.7) applies at the time of subdivision and requires connections to the stormwater network to be provided for all resultant sites that are likely to be developed, where stormwater infrastructure is available (amongst other requirements).

500. This requirement presents some uncertainty to Plan users where the stormwater infrastructure they are to connect to is an open watercourse (i.e. not piped infrastructure). In this case, the requirement to lay pipe as part of making a connection will not always make sense.

501. Furthermore, this requirement does not work well with the more integrated approach to stormwater management being promoted through Variation 2. For example, it is superfluous where requirements for stormwater management plans and on-site stormwater management systems will apply. These are being introduced for large new greenfield residential zoned areas through the addition of the new development mapped area, as addressed under Change F2-2 below. It also does not work well where subdivision in other areas may require on-site stormwater management (see Change F2-3).

502. It can also be difficult for applicants to know where stormwater infrastructure will be 'available' and therefore where the requirement to connect will apply.

15.3.3 Proposed change and assessment

503. Change F2-1 makes the following change:

- a. Delete part of Rule 9.3.7 (9.3.7.1.b) so that connections to the stormwater network are no longer required as part of the service connections performance standard.

15.3.3.1 Assessment against Objective 2.7.1 – Efficient infrastructure

504. The proposed change will not have any measurable impact on whether Objective 2.7.1 is effectively achieved but will improve Plan efficiency by removing a superfluous requirement. Overall, requirements to connect to stormwater infrastructure will still be considered as part of the assessment of subdivision consent applications without this standard applying and requirements to connect can be added as conditions of consent on a case-by-case basis. Connections to stormwater infrastructure are also dealt with through the assessment of building consent applications under the Building Act.

505. No practicable alternatives to the preferred option and status quo have been identified or assessed as part of Change F2-1.

15.4 Change F2-2 – Rules for stormwater management in large greenfield areas

15.4.1 Purpose of proposal and scope of change

506. The purpose of this proposal is to add provisions to ensure stormwater from development of large areas of greenfield residential land will be appropriately managed, including by ensuring effects on both private and public stormwater systems, and where stormwater may directly or indirectly lead to flood hazards elsewhere, are appropriately assessed.

15.4.2 Background and issues of concern

507. Section 11.3 on the background to Change D discusses how subdivision and development of greenfield residential land is currently managed in the Plan. This includes information on the current approach of applying structure plan mapped areas to each greenfield rezoning area and relying on the assessment matters for subdivision for most outstanding considerations and is also relevant to this proposal.

508. One of the matters of discretion for subdivision consents is 'effects on efficiency and affordability of infrastructure', with the main assessment guidance provided in Rule 9.6.2.4. This guidance includes details of design considerations for large subdivisions and general assessment guidance, as follows:

Design considerations for large subdivisions that involve new stormwater management systems that may support a consent application:

- v. Stormwater management areas are integrated into the layout of the subdivision and neighbourhood including in reserves.

vi. The subdivision integrates design elements to minimise adverse effects on the stormwater infrastructure, for example through:

1. minimum impermeable surfaces
2. grassed/landscaped swales and other vegetation areas
3. infiltration trenches/bio-retention systems
4. wetlands/sediment ponds
5. rainwater tanks- harvesting and reuse
6. rain gardens, rooftop greening and planting, and
7. porous surface treatments.

General assessment guidance:

vii. If required, Council will consider the contents of an integrated stormwater catchment management plan or approved stormwater discharge consent.

509. Of note, no guidance is provided on when a stormwater management plan is required to be provided as part of the application, nor guidance on when on-site stormwater management is expected. This has led to issues with the processing of subdivision consent applications where stormwater effects and on-site stormwater management have not been sufficiently considered as part of the proposal and adverse effects from stormwater have not been appropriately managed.
510. The risk of cumulative adverse effects from stormwater will be higher given the number and scale of new greenfield residential zoned areas being added to the Plan as part of Variation 2. DCC 3 Waters have assessed the proposed rezoning sites and advised that stormwater management plans that set out the design and location of any necessary on-site stormwater management systems will be required to enable them to support the rezoning proposals.
511. The following key improvements to the Plan's approach to stormwater management are considered necessary for subdivision and development of large greenfield residential zoning areas.
512. It is considered that the provisions must:
- a. Provide clearer direction on the requirements for stormwater management as part of the subdivision process and the development of impermeable surfaces;
 - b. Require, in the first instance, that stormwater management systems be designed in an integrated manner considering the wider greenfield residential area that a subdivision proposal is within, as site-by-site mitigation is often less effective and can detract from the use of green infrastructure;
 - c. Require effects on both public and private stormwater infrastructure to be considered as they are each part of the overall stormwater system;
 - d. Provide direction on how stormwater flows and effects are expected to be calculated;

- e. Encourage the use of low impact/green infrastructure as the preferable method of stormwater management where this is practicable; and
 - f. Require stormwater quality to be managed to ensure the current and future conditions of DCC's stormwater discharge consents can be met.
513. As part of the status quo option, structure plan mapped area performance standards could be applied to each rezoning site setting out the requirements for stormwater management. However, this approach needs detailed information and assessment of each rezoning site and design of a stormwater management system to be undertaken as part of the plan change process. This type of assessment is better pursued by the eventual developer of the rezoning site to enable them to design the system to suit their proposed development. Otherwise inflexible structure plan rules can be a hindrance to future development and be ineffective in managing stormwater effects. As such, this approach is ineffective and inefficient in achieving Objective 2.7.1 on Efficient infrastructure, and Objective 2.6.2 on Adequate urban land supply, hence the proposal assessed below.

15.4.3 Proposed change and assessment

514. Change F2-2 relies on the addition of the new development mapped area (NDMA) to large areas of greenfield residential zoning and adds provisions requiring submission of a stormwater management plan:
- a. at the time of applying for a subdivision consent;
 - b. for development that contravenes a new service connection performance standard; and
 - c. for multi-unit development or supported living facilities.
 - d. The reason for identifying these three activities is that in some case, typically in the case of retirement villages, large scale development is done without subdividing first.
515. Change F2-2 also involves reflecting this new method in the strategic directions through an amendment to Objective 2.2.2 and a new strategic Policy 2.2.2.Y.
516. Change F2-2 makes the following changes:
- a. Add new Policy 2.2.2.Y to encourage on-site low impact design stormwater management in the NDMA;
 - b. Delete Policy 2.2.5.2 regarding on-site stormwater management (also part of Change F1-6 which is assessed in the minor changes table at the end of this section);
 - c. Amend Policy 2.7.1.2 by adding a new clause on the requirement for on-site stormwater management in the NDMA;
 - d. Add new Policy 9.2.1.Y setting the outcome statements for on-site stormwater management in an NDMA as part of subdivision activities;
 - e. Add new Policy 9.2.1.X requiring development of impermeable surfaces in the NDMA to connect to the on-site stormwater management system;

- f. Add new Rule 9.3.7.AA to the service connections performance standard requiring impermeable surfaces in the NDMA to connect to the on-site stormwater management system;
- g. Add new Note 9.3.7.AAA to the service connections performance standard regarding stormwater advising the plan-user of the requirements in Policy 9.2.1.Y for installation of a communal stormwater management system prior to development;
- h. Add new assessment Rule 9.5.3.Z for contravention of the new service connections performance standard for stormwater with a link to new Rule 9.9.x;
- i. Add new assessment Rule 9.6.2.X for all subdivision in a NDMA with a link to new Rule 9.9.X;
- j. Add new special information requirement Rule 9.9.X setting out requirements for stormwater management plans in NDMAs;
- k. Amend development activity status table Rule 15.3.4.1 to link to the new service connections performance standard for stormwater;
- l. Add new Rule 15.6.X linking to new Rule 9.3.7.5 on service connections for stormwater;
- m. Add new assessment Rule 15.10.4.Y for contravention of the new service connections performance standard for stormwater with a link to Rule 9.5; and
- n. Add new assessment Rule 15.11.5.Y for all subdivision in a NDMA with a link to Rule 9.6.

15.4.3.1 *Assessment against Objective 2.7.1 – Efficient Infrastructure*

- 517. Change F2-2 will set explicit policies and assessment rules regarding the expectations for management of stormwater effects as part of the subdivision and development of large areas of greenfield residential land. Overall, for areas within the new development mapped area, subdivision and development will require on-site stormwater management to be installed as a part of the subdivision process, considering the hydrology of the wider area. This must result in no increase in the peak rate of stormwater discharge from the site where practicable or may otherwise only result in adverse effects that are no more than minor (Policy 9.2.1.Y).
- 518. This approach will ensure that Objective 9.2.1 (Land use, development and subdivision activities maintain or enhance the efficiency and affordability of public water supply, wastewater and stormwater infrastructure) can be effectively achieved. This, in turn, will provide for Objective 2.7.1 to be more effectively achieved so that public infrastructure networks operate efficiently and effectively and have the least possible long-term cost burden on the public as part of the process of new residential urban expansion.

15.4.3.2 *Assessment against Objective 2.2.5 & Amended Objective 2.2.2 – Environmental Performance*

- 519. The introduction of clear requirements for on-site stormwater management in NDMAs, including the encouragement of low impact design solutions and management of stormwater

quality, will ensure that the environmental costs of residential urban expansion can be reduced compared to the status quo. This will ensure that Objective 2.2.5 on Environmental performance, and its proposed replacement in Objective 2.2.2, can be more effectively achieved.

15.4.3.3 *Assessment against Objective 2.2.1 – Risk from Natural Hazards*

520. The new requirements for on-site stormwater management will also have benefits in ensuring Objective 2.2.1 and related Objective 11.2.1 are achieved with respect to flood hazards. Increased stormwater flows from urbanisation can create or exacerbate flood hazards downstream, including from the movement of water and from ponding. By requiring no increase in the peak rate of stormwater discharge from new development sites, the effects on downstream flood risk will be assessed as part of the subdivision process.

15.4.3.4 *Assessment against Objective 2.6.1 – Housing choice & Objective 2.6.2 – Adequate urban land supply*

521. By imposing the new requirements for on-site stormwater management in greenfield areas, the proposed new large greenfield residential zonings can be supported by DCC 3 Waters. This enables the rezoning to proceed and will provide more urban land supply and housing choice for the community to ensure that objectives 2.6.1 and 2.6.2 are achieved.

15.5 Change F2-3 – Rules for residential stormwater management other than in large greenfield areas

15.5.1 Purpose of proposal and scope of change

522. The purpose of the proposal is to review the methods used to manage stormwater effects within the existing residential areas (not large greenfield areas) to ensure that the provisions are clear, and the relevant strategic objectives are effectively and efficiently achieved.

15.5.2 Background and issues of concern

523. Stormwater effects are currently managed in the residential zones through the following provisions:
- a. Assessment of all subdivision as a restricted discretionary activity (Rule 15.11.4.1 and Rule 9.6.2.4 and Rule 9.6.2.5);
 - b. Assessment of supported living facilities as a restricted discretionary activity (Rule 15.11.2.5 and Rule 9.6.2.2);
 - c. Application of the maximum building site coverage and impermeable surfaces performance standard to all permitted, controlled and restricted discretionary development activities (Rule 15.6.10);
 - d. Application of the service connections performance standard to all subdivision (Rule 15.7.5 and Rule 9.3.7);
 - e. Application of performance standards to some structure plan mapped areas; and
 - f. Assessment of discretionary and non-complying activities.

524. There is a need to address the following issues with the current approach to managing stormwater effects within the existing residential areas:
- a. The current focus of provisions for stormwater is on effects on public stormwater infrastructure to the exclusion of effects on private stormwater infrastructure, even though effects on one usually results in effects on the other due to the interconnected nature of the overall stormwater system;
 - b. The current policy (Policy 9.2.1.1) for the assessment of subdivision is silent on the management of stormwater effects and a new policy is required to address this gap;
 - c. The current policy for the impermeable surfaces performance standard (Policy 9.2.1.2) does not provide guidance on how adverse stormwater effects should be managed when the performance standard is contravened;
 - d. The impermeable surfaces standard was not set based on rigorous modelling and does not assume that development to that level on all sites will be acceptable in terms of effects on stormwater. It was set taking into account what might be typical levels of impermeable surfaces required based on the density of development provided for and only triggers assessment of atypical developments. It is not reliable as a benchmark for when unacceptable adverse effects will arise;
 - e. Stormwater effects from multi-unit development currently cannot be considered as part of the consenting process, which sets an inappropriate permitted baseline against which subdivision could be inappropriately considered; and
 - f. There is no guidance on when a stormwater management plan may be required to enable the assessment of resource consent applications for supported living facilities, contravention of the impermeable surfaces performance standard, and subdivision, or for how the stormwater assessments should be undertaken.

15.5.3 Proposed change and assessment

525. Change F2-3 amends the assessment of activities in all locations for stormwater effects, including by amending policies in Section 9 and adding consideration of stormwater as part of the assessment of consents for multi-unit development.
526. Change F2-3 makes the following changes:
- a. Amend the definition of public infrastructure to clarify that stormwater infrastructure can include drains and open channels;
 - b. Add new Policy 9.2.1.Z regarding stormwater effects from multi-unit development, supported living facilities, subdivision, and development that contravenes the impermeable surfaces performance standard (part-replacement for Policy 9.2.1.1 and Policy 9.2.1.2);
 - c. Delete Policy 9.2.1.2 for the assessment of impermeable surfaces;
 - d. Amend the relevant assessment rules to replace or add reference to the new Policy 9.2.1.Z and reference to the new special information requirement, along with any

other changes needed to the assessment guidance (rules 9.4.1.1, 9.5.3.11, 9.6.2.2, 9.8.2.5, and 27.11.3.1);

- e. Add provisions to the new Rule 9.9.X special information requirement for stormwater management plans, so that these may be required as part of the assessment of relevant consent applications;
- f. Amend Rule 15.10.4.10 (c and d) to clarify and add matters of discretion regarding stormwater;
- g. Amend Rule 15.11.2.5.a to clarify the matter of discretion regarding stormwater;
- h. Add Rule 15.11.2.5.X to add a matter of discretion regarding stormwater from future development;
- i. Add Rule 15.11.3.X so that effects on efficiency and affordability of infrastructure (stormwater) can be considered for the assessment of consents for multi-unit development;
- j. Amend Rule 15.11.4.1.c to clarify the matter of discretion regarding stormwater; and
- k. Add Rule 15.11.4.1.X to add a matter of discretion regarding stormwater from future development.

15.5.3.1 *Assessment against Objective 2.7.1 – Efficient Infrastructure*

- 527. Change F2-3 provides more detailed guidance on the outcomes sought for stormwater assessment and management for relevant consent applications within the existing residential area. At the same time, the provisions retain flexibility so that they can be applied as appropriate to the scale and significance of the proposal and the anticipated degree of stormwater effects.
- 528. By providing greater guidance on the assessment of subdivision applications in particular, effects from stormwater that might arise from future development (including development that is a permitted activity, in accordance with Change F2-5 below) can be considered in an integrated way prior to the on-sale of resultant lots to individual landowners to develop.
- 529. Overall, the changes will ensure that effects from stormwater in the residential zones will be more effectively managed to ensure that Objective 2.7.1 and related objective 9.2.1 is achieved.

15.5.3.2 *Assessment against Objective 2.2.5 and Amended Objective 2.2.2 – Environmental Performance*

- 530. Change F2-3 will also assist in achieving Objective 2.2.2 (as the replacement for Objective 2.2.5) by enabling appropriate consideration of the stormwater generated by land use, development and subdivision to ensure the environmental costs from the quality and quantity of stormwater discharge are reduced as much as is practicable in each different circumstance.

15.5.3.3 Assessment against Objective 2.2.1 – Risk from Natural Hazards

531. In enabling generation of additional stormwater to be better managed, Change F2-3 will also have benefits in achieving Objective 2.2.1 with respect to effects on any flood hazards downstream of application sites.

15.6 Change F2-5 – Impermeable surfaces permitted baseline

15.6.1 Purpose of proposal and scope of change

532. The purpose of this change is to consider whether guidance on the application of the permitted baseline with respect to the performance standard for maximum building site coverage and impermeable surfaces (Rule 15.6.10) needs to be included in the plan.

15.6.2 Background and issues of concern

15.6.2.1 Background to Rule 15.6.10

533. The performance standard for maximum building site coverage and impermeable surfaces (Rule 15.6.10) applies to development activities in all residential zones. There are two parts to the standard:
- a. Maximum building site coverage: buildings and structures with a footprint greater than 10m² (% of site)
 - b. Maximum building site coverage: buildings and structures and any impermeable surfaces (% of site)
534. The first part of the standard's focus is on managing effects on on-site amenity for residents and effects on neighbourhood residential character and amenity. The second part of the standard focuses on effects on efficiency and affordability of infrastructure (although it is noted that the same matters of discretion apply to any contravention of the standard).
535. Regarding effects on the efficiency and affordability of infrastructure, the effects of stormwater are the primary consideration to ensure Objective 2.7.1 on Efficient Infrastructure (implemented through Objective 9.2.1 and Policy 9.2.1.2) is achieved.
536. The current limits for impermeable surfaces set in Rule 15.6.10 were arrived at to "reflect a fair balance between urban land use needs, existing site coverage trends and manageable stormwater volume and intensity"³⁴. They were designed to work in tandem with a requirement for stormwater management plans for subdivisions and non-complying activities.
537. The 2GP hearings panel commented on the need to manage adverse effects while also not placing an unreasonable consenting burden on residential development (which might act to discourage the level of development anticipated in each zone)³⁵. It was considered that the allowance for impermeable surfaces would not be fully taken up in many instances and this

³⁴ See page 1 of the memorandum on **Maximum Site Coverage & Impermeable Surfaces** (11 August 2015) by Tom Dyer, available at: [https://2gp.dunedin.govt.nz/2gp/documents/Section32_Background_Documents/Residential/Maximum%20site%20coverage%20and%20impermeable%20surfaces%20memo%20\(Water%20and%20Waste%20DCC,%20August%202015\).pdf](https://2gp.dunedin.govt.nz/2gp/documents/Section32_Background_Documents/Residential/Maximum%20site%20coverage%20and%20impermeable%20surfaces%20memo%20(Water%20and%20Waste%20DCC,%20August%202015).pdf)

³⁵ See paras. 301-302 & 306 of the **2GP Residential Zones Decision of Hearings Panel**, 7 November 2018.

would ensure that, on average, overall impermeable surface coverage would not adversely affect stormwater infrastructure.

- 538. An issue has arisen since these provisions became operative where applicants submitting subdivision consent applications have argued that Rule 15.6.10 sets a permitted baseline for impermeable surfaces. On this basis, applicants consider that DCC 3 Waters must expect that development to the maximum permitted impermeable surface limit on all sites is acceptable in terms of effects on stormwater infrastructure. However, as explained above, this is not the case.
- 539. Subdivision applicants have sought the application of the permitted baseline for impermeable surfaces to ensure that they are not required to undertake stormwater management plans and attenuate stormwater effects that may arise from future permitted development as part of their proposals.
- 540. The evidence from the development of the 2GP indicates that the two methods (the impermeable surfaces standard and assessment of likely stormwater effects as part of the subdivision process) were designed to work together. It also indicates that additional methods of control were likely to be required through the development of a stormwater bylaw³⁶, although this has not yet come to fruition.
- 541. Clarification is required that Dunedin City Council will generally not consider Rule 15.6.10 as a permitted baseline for the consideration of applications for subdivision consent.

15.6.2.2 Permitted baseline and the 2GP

- 542. The ‘permitted baseline test’ allows the Dunedin City Council to disregard adverse effects which are permitted by a rule or a national environmental standard when assessing a resource consent application.
- 543. Dunedin City Council is not required to apply the permitted baseline test, it is voluntary. It may be inappropriate to apply the permitted baseline where the permitted effect would only arise as a result of a fanciful activity or where the permitted baseline may have unintended or undesirable consequences for matters set out in Part to of the Act.
- 544. Permitted baseline may be applied when Dunedin City Council makes decisions on whether or not an adverse effect is more than minor (section 95D of RMA), who is an affected person (section 95E of RMA) and in the consideration of resource consent applications in relation to any actual and potential effects on the environment of allowing the activity (section 104 (1)(a) of RMA).
- 545. The 2GP contains rules that outline where a consistent approach to the assessment of the “permitted baseline” in terms of sections 95D(b) and 95E(2)(a) of the RMA will be used. These rules are not used frequently and only where rules are included in the Plan that:
 - a. are enabling towards activities with positive effects by tolerating a higher level of adverse effects and where that same level of tolerance for adverse effects should

³⁶ See page 2 of the memorandum on **Maximum Site Coverage & Impermeable Surfaces** (11 August 2015) by Tom Dyer, available at: [https://2gp.dunedin.govt.nz/2gp/documents/Section32_Background_Documents/Residential/Maximum%20site%20coverage%20and%20impermeable%20surfaces%20memo%20\(Water%20and%20Waste%20DCC,%20August%202015\).pdf](https://2gp.dunedin.govt.nz/2gp/documents/Section32_Background_Documents/Residential/Maximum%20site%20coverage%20and%20impermeable%20surfaces%20memo%20(Water%20and%20Waste%20DCC,%20August%202015).pdf)

not be applied in situations where the balancing positive effects are not also achieved; or

- b. where an enabling performance standard (high tolerance for effects) is required due to the specific operational needs of any activity, where a stricter standard can be used for other activities.

546. Examples of existing permitted baseline rules in the 2GP can be found in Section 15.4 on notification in the residential zones.

15.6.3 Proposed change and assessment

547. The proposed change adds a permitted baseline rule which directs that Dunedin City Council will generally not consider compliance with the maximum building site coverage and impermeable surfaces performance standard (Rule 15.6.10) as part of the permitted baseline when considering applications for subdivision.

548. Change F2-5 makes the following change:

- a. Add a new permitted baseline rule at Rule 15.4.x.

15.6.3.1 Assessment against Objective 2.7.1 – Efficient Infrastructure

549. The change will provide certainty to developers regarding how subdivision consents will be assessed with respect to the maximum building site coverage and impermeable surfaces performance standard for development. This will support the integrated consideration of stormwater effects as part of subdivision proposals so that management of this issue is not wholly provided through the application of Rule 15.6.10 (as this was never anticipated, as demonstrated by the assessment guidance for subdivision in Rule 9.6.4 which discusses stormwater management).

550. This change will also provide support for other changes proposed in Variation 2 to support the assessment of stormwater effects, such as Change F2-3.

551. Overall, this will ensure that Objective 2.7.1 and related objective 9.2.1 can be more effectively and efficiently achieved.

15.6.3.2 Assessment against Objective 2.2.1 – Risk from natural hazards

552. Change F2-5 will also assist in achieving Objective 2.2.1 by better managing the stormwater generated by subdivision and the permitted activities it provides for. The quantity and rate of stormwater discharge from sites and changes that occur as a result of development have cumulative effects on flood hazards downstream of the site.

15.6.3.3 Assessment against Objective 2.2.2/2.2.5 – Environmental performance

553. Change F2-5 will assist in achieving Objective 2.2.5 and its proposed replacement in Objective 2.2.5 by reducing adverse effects from the quantity of stormwater discharge by ensuring these are appropriately considered as part of subdivision applications.

15.6.3.4 *Assessment against Objective 2.4.1 – Character and amenity*

554. As Change F2-5 does not amend the impermeable surfaces limits in Rule 15.6.10 themselves, there will be no impact on how effective this standard is in managing effects on character and amenity.

15.6.3.5 *Assessment against Objective 2.6.1 – Housing choice*

555. Change F2-5 may create a perceived increase in costs to developers undertaking subdivision that could be seen to impact on the affordability of resultant sites and housing development. However, as it was always intended that stormwater be managed through the subdivision process, it is considered that there will be no impact on the achievement of Objective 2.6.1 compared to the status quo.

15.7 Change F2-7 –Stormwater constraint mapped area method

15.7.1 Purpose of proposal and scope of change

556. The purpose of the proposal is to add provisions to the Plan for selected areas of General Residential 2 Zone rezoning proposed through Variation 2 to ensure that no increase in stormwater effects is provided for as part of the rezoning without a resource consent being sought.

15.7.2 Background and issues of concern

557. Advice from DCC 3 Waters regarding most areas of General Residential 2 rezoning proposed through Variation 2 is that no additional stormwater effects can be tolerated in these areas due to known existing stormwater infrastructure constraints (this includes all sites proposed under an 'IN00' change number except for three, being IN02, IN10, and IN12).
558. In providing for rezoning from the General Residential 1 Zone to the General Residential 2 Zone, the provisions of the maximum building site coverage and impermeable surface rule provide for an increase of impermeable surface site coverage from 70% to 80%. This enables an increase in stormwater effects from permitted activities, which should not be allowed without a consent application being made to demonstrate how stormwater effects will be managed in the relevant locations.
559. It is noted that stormwater effects arising from any subdivision that occurs in these newly zoned areas can still be considered through the new policies and assessment rules proposed under Change F2-3 above.

15.7.3 Proposed change and assessment

560. Change F2-7 adds a new stormwater constraint mapped area to apply to the identified areas of new General Residential 2 Zone (GR2) rezoning where it is necessary to hold the impermeable surfaces limit at that for the General Residential 1 Zone, due to known stormwater constraints.
561. Change F2-7 makes the following changes:
- a. Amend Policy 2.6.2.3 to add reference to the new stormwater constraint mapped area;

- b. Amend zone description for General Residential 2 Zone at Section 15.1.1.2 to add reference to the new stormwater constraint mapped area;
- c. Consequential change to Rule 15.6.10.b; and
- d. Add a new Rule 15.6.10.x for maximum building site coverage and impermeable surfaces in the GR2 Zone within the new stormwater constraint mapped area.

15.7.3.1 *Assessment against Objective 2.7.1 – Efficient Infrastructure & Objective 2.2.1 – Natural Hazards*

- 562. Change F2-7 will ensure that effects of providing for medium density zoning in the identified locations on stormwater infrastructure and any downstream flooding can be held at the current permitted level, and any demand for increases in impermeable surfaces can be considered as part of the consenting process. This will ensure Objective 2.7.1 (and related Objective 9.2.1), and Objective 2.2.1 (and related Objective 11.2.1) can be achieved while progressing the proposed rezoning.

15.7.3.2 *Assessment against Objective 2.6.1 - Housing Choice & Objective 2.6.2 - Adequate urban land supply*

- 563. Change F2-7 will ensure that the proposed medium density rezoning can be supported by DCC 3 Waters, which will enable the rezoning to be progressed. This will improve the supply of housing development capacity within the existing urban area to help in achieving objectives 2.6.1 and 2.6.2.

15.8 Alternatives assessed

15.8.1 Alternative F2-Alt1: Impermeable surfaces standard

- 564. Alternative F2-Alt1 is to review and amend the impermeable surface limits in Rule 15.6.10 to reduce them to a level at which the effects on the stormwater network would be acceptable if all sites were developed to the maximum permitted impermeable surface coverage.
- 565. This option would be preferable in terms of certainty for developers as it would mean that stormwater assessments would not be required if the standards were met (saving time and money).
- 566. However, setting standards accurately would require good baseline information and modelling for all catchments, which is currently not available (see Section 4.3 above on the current limitations for stormwater public infrastructure).
- 567. Consultation with members of the surveying and development community has identified that options such as this alternative should be considered in greater detail. This will be advanced between notification of Variation 2 and the hearing, in anticipation of submissions seeking this option to be progressed.

15.8.2 Alternative F2 -Alt2: Performance standard for on-site stormwater detention

- 568. Alternative F2-Alt2 is to add a performance standard requiring the installation of on-site stormwater detention systems of a specified size per area of buildings or per area of impermeable surface.

569. Detention system size requirements could be uniform across each residential zone or vary depending on the application of mapped areas to identify catchments where there are known or likely stormwater infrastructure constraints.
570. The benefit of this approach would be that it would create more certainty for developers and would remove the cost and difficulty of having to do stormwater assessments on a case by case basis.
571. However, like for Alternative F2-Alt1 above, setting standards accurately would require good baseline information and modelling for all catchments, which is currently unavailable.
572. Consultation with members of the surveying and development community has identified that options such as this alternative should be considered in greater detail. This will be advanced between notification of Variation 2 and the hearing, in anticipation of submissions seeking this option to be progressed.

16 WASTEWATER PACKAGE

16.1 Summary of changes

573. The purpose of this proposal is to improve the provisions in the Plan that manage the assessment of wastewater effects in the residential zones from land use, development, and subdivision activities.
574. The need for these improvements arises principally from the new greenfield residential rezoning being proposed as part of Variation 2 and the presence of significant wastewater public infrastructure constraints around the City (Change F3-2). The changes also address some issues identified with existing provisions regarding health and safety effects of on-site wastewater disposal (Change F3-4).

16.2 Relevant objectives

575. Section 32(1)(b) of the Act requires an assessment of whether the proposed provisions are the most appropriate way to achieve the objectives or purpose of the proposal. Section 32(3) also requires the proposal to be assessed against the objectives of the Second Generation Dunedin City District Plan (2GP). In this case the purpose of the proposal is also reflected in the objectives of the 2GP so the assessment has focused on an evaluation against those objectives.
576. The relevant objectives (which are provided in full in Appendix 1) have been identified as:
- a. Objective 2.6.1 Housing choices;
 - b. Objective 2.6.2 Adequate urban land supply; and
 - c. Objective 2.7.1 Efficient public infrastructure.
577. This assessment must:
- a. identify other reasonably practicable options for achieving the objectives;
 - b. assess the efficiency and effectiveness of the provisions in achieving the objectives, including consideration of the benefits and costs anticipated from the implementation of the provisions, and the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions; and
 - c. summarise the reasons for deciding on the provisions.

16.3 Change F3-2 – Wastewater detention in selected large greenfield areas

16.3.1 Purpose of proposal and scope of change

578. The purpose of this proposal is to consider the appropriateness of allowing wastewater detention tanks as a solution to provide for zoning and development of larger greenfield residential areas where this could not otherwise be supported due to wastewater infrastructure constraints.

16.3.2 Background and issues of concern

579. As set out in Section 4.1 above, there are capacity constraints in the wastewater public infrastructure network throughout the city.
580. The criteria for deciding whether to zone land to a residential zone is set out in Policy 2.6.2.1. Regarding effects on public infrastructure, Policy 2.6.2.1 states:

Identify areas for new residential zoning based on the following criteria...

- b. rezoning is unlikely to lead to pressure for unfunded public infrastructure upgrades, unless either an agreement between the infrastructure provider and the developer on the method, timing, and funding of any necessary public infrastructure provision is in place, or a Residential Transition overlay zone is applied and a future agreement is considered feasible;*
 - c. ...*
 - d. considering the zoning, rules, and potential level of development provided for, the zoning is the most appropriate in terms of the objectives of the Plan, in particular:*
 - ...*
 - ix. public infrastructure networks operate efficiently and effectively and have the least possible long term cost burden on the public (Objective 2.7.1)*
581. This policy sets a clear test that residential activity enabled by residential zoning should not result in effects on wastewater public infrastructure beyond the capacity currently available, or beyond that planned to be available through funding for relevant wastewater projects (which is allocated in the 10 Year Plan). The only alternatives to meeting this test are an agreement with the developer on public infrastructure provision or the application of a Residential Transition Overlay Zone (RTZ).
582. In assessing the appropriateness of rezoning of sites, and in discussion with landowners/developers, consideration is given to whether it would be feasible to upgrade public infrastructure networks to resolve constraints. In some cases, this is possible, and an agreement of this type is reached. However, in other cases the extent of upgrades required make this option unfeasible and it is necessary to wait until this upgrade is planned by the DCC.
583. This proposal considers an additional option of addressing wastewater constraints through use of on-site wastewater detention systems that detain wastewater on site during peak flows and release it to the public infrastructure network in a controlled way at times of off-peak demand. This method has generally not been supported by DCC 3 Waters in the past principally due to the potential for adverse effects arising from poor system maintenance and the burden this might place on the DCC. In order to reduce these risks, the proposal in Variation 2 only provides for this method for larger developments of 50 or more residential units. This figure was chosen to achieve an appropriate balance between the costs and risks of this method with the potential benefits for housing capacity.
584. The review of the approach to wastewater management is supported by the report entitled *3 Waters Strategic Direction Position Paper* (December 2020), by AR & Associates (see Variation 2 supporting documents).

585. A method requiring on-site wastewater detention as part of the rezoning of residential greenfield areas could be implemented through the status quo approach of applying structure plan mapped areas and associated performance standards at the time of rezoning. This approach needs detailed information and assessment of each rezoning site and design of systems to be undertaken as part of the plan change process. While this would provide certainty to all parties regarding how wastewater will be managed for relevant development sites, it is difficult to design requirements for a wastewater system when the eventual form of development that will be proposed for a site is unknown. Therefore, this approach could be too inflexible to provide for a range of development outcomes while also effectively achieving Objective 2.7.1 on Efficient infrastructure. This approach is not included in Variation 2 as there were no sites where it was considered appropriate. However, this approach may be appropriate in some circumstances and can be considered in the future.

16.3.3 Proposed change and assessment

586. Change F3-2 is linked to the addition of the new development mapped area (NDMA) to large areas of greenfield residential zoning and, for selected sites within the NDMA, requires the submission of a wastewater management plan at the time of applying for consent for subdivision, multi-unit development, or supported living facilities, including a requirement for on-site communal wastewater detention.
587. Change F3-2 makes the following changes:
- a. Add new clause to Policy 2.7.1.2 to set up the method for requiring wastewater detention for specified sites in the NDMA to allow urban expansion;
 - b. Add new Policy 9.2.1.BB to implement the new method, requiring wastewater detention for subdivision, multi-unit development or supported living facilities to connect to wastewater detention systems;
 - c. Add new Note 9.3.7.ZA (clause b) regarding the unavailability of connections directly to the wastewater public infrastructure in specified NDMA as guidance for the application of the service connections performance standard;
 - d. Add new assessment Rule 9.6.2.Y for subdivision, multi-unit development and supported living facilities in selected NDMA (including general assessment guidance and conditions that may be imposed);
 - e. Add new special information requirement Rule 9.9.Y requiring submission of a wastewater management plan for resource consent applications in selected NDMA and setting out the requirements for communal wastewater detention; and
 - f. Add new assessment Rule 15.11.5.Z (links to 9.6.2.Y).

16.3.3.1 Assessment against Objective 2.7.1 – Efficient Infrastructure

588. The special information requirement sets out specific details for the design of these systems. This will ensure proposals minimise the risk of adverse effects on the efficient and effective operation of the network from the time of installation until the systems can be decommissioned when public infrastructure upgrades are complete.
589. In terms of the long-term cost burden on the public, the installation costs of communal wastewater detention will fall to the developer. However, ongoing management will be

DCC's responsibility through the vesting of systems in the DCC. Costs of managing this infrastructure will be higher than for a normal infrastructure connection due to additional staff and contractor time requirements to operate and maintain these systems. This is considered necessary to ensure that the systems operate well over their lifespan and so that the timing and rate of flows from them into the public infrastructure network can be centrally controlled.

- 590. To appropriately balance the cost of these system to the DCC against their potential benefits for adding housing capacity earlier and better achieving Objective 2.6.1, the approach is to only provide for these systems where they will service at least 50 new residential units.
- 591. Overall, it is considered that the proposal will ensure that Objective 2.7.1 can still be effectively and efficiently achieved through the addition of these provisions, albeit to a lesser extent than if the systems were not required.

16.3.3.2 *Assessment against Objective 2.6.2 – Adequate urban land supply & Objective 2.6.1 – Housing choice*

- 592. By enabling the use of communal wastewater detention systems, additional greenfield residential rezoning sites can be included as part of Variation 2. This will ensure that sufficient housing development capacity can be provided so that Objective 2.6.2 can be achieved. This will also provide benefits in terms of providing a choice of greenfield housing options to meet demand so that Objective 2.6.1 can also be achieved.

16.4 Change F3-4 – Health and safety effects from wastewater

16.4.1 Purpose of proposal and scope of change

- 593. The purpose of the proposal is to review whether effects on health and safety should be a consideration in the Plan as part of assessing the development of on-site wastewater and stormwater disposal, and for the discharge of trade and industrial wastes.

16.4.2 Background and issues of concern

- 594. The Plan currently provides for the assessment of 'effects on health and safety' as a matter of discretion for assessment of resource consents where on-site wastewater or stormwater disposal, or discharge of trade and industrial wastes, is part of the proposal. The following rules apply this matter:
 - a. Contravention of the performance standard for density for papakaika in the Residential zones (Rule 15.10.3.2 and Rule 9.5.3.2);
 - b. Assessment of controlled papakaika in the Rural zones (Rule 16.8.2.1);
 - c. Assessment of restricted discretionary intensive farming in the Rural zones (Rule 16.10.2.5 and Rule 9.6.2.7);
 - d. Assessment of restricted discretionary general subdivision in the Rural zones (Rule 16.10.4 and Rule 9.6.2.5);
 - e. Assessment of restricted discretionary general subdivision in the Rural Residential zones (Rule 17.10.4.1 and Rule 9.6.2.5);

- f. Assessment of restricted discretionary subdivision activities in the Industrial zones (Rule 19.10.5.1 and Rule 9.6.2.5); and
 - g. Assessment of restricted discretionary general subdivision in the Recreation Zone (Rule 20.10.4.1 and Rule 9.6.2.5).
595. In addition, guidance on assessment of effects on health and safety is also provided for the following discretionary activities:
- a. Assessment of discretionary mining (Rule 9.7.3.1);
 - b. Assessment of discretionary Rural industry and Rural contractor and transport depots – large scale (Rule 16.11.2.3 and Rule 9.7.3.2); and
 - c. Contravention of the performance standard for density for papakāika in the Rural zones (Rule 9.7.4.3).
596. The overall issue identified is that effects from on-site wastewater and stormwater disposal are already managed by methods that sit outside the Plan, being:
- a. For wastewater, through implementation of the Building Act at the time of assessing applications for building consent (must comply with the Building Code G13 Foul water) and through the Regional Plan: Water for Otago (Section 12.A Discharge of human sewage);
 - b. For trade and industrial discharges, through implementation of the DCC Trade Waste Bylaw and through implementation of the Regional Plan: Water for Otago (Section 12.B Discharge of hazardous substances, hazardous wastes, specified contaminants, and stormwater; and discharges from industrial or trade premises and consented dams); and
 - c. For stormwater, through implementation of the Regional Plan: Water for Otago (Section 12.B Discharge of hazardous substances, hazardous wastes, specified contaminants, and stormwater; and discharges from industrial or trade premises and consented dams).
597. It is considered that the Plan should not manage issues that are managed by other processes for reasons of Plan efficiency.

16.4.3 Proposed change and assessment

598. Change F3-4 proposes to delete all provisions that require the assessment of effects on health and safety arising from on-site wastewater and stormwater disposal and the discharge of trade and industrial wastes, and instead rely on methods that sit outside the Plan.
599. Change F3-4 includes the following changes:
- a. Delete Policy 9.2.2.7 on health and safety effects;
 - b. Delete Rules 9.5.3.2, 9.6.2.1, 9.6.2.5, 9.7.3.2 which provide for assessment of health and safety effects;
 - c. Amend Rules 9.7.3.1, 9.7.4.3, 15.10.3.2, 16.8.2.1, 16.10.2.5, 16.10.4.1, 16.11.2.3, 17.10.4.1, 19.10.5.1, 20.10.4.1 (consequential to deletion of Policy 9.2.2.7); and

- d. Add new Note 9.3.7.ZA (clauses c-e) to advise the plan user of the requirements that sit outside the Plan regarding on-site wastewater disposal and trade and industrial discharges.

16.4.3.1 *Assessment against Objective 2.2.6 – Public health and safety*

- 600. The proposed deletion of provisions will not affect whether Objective 2.2.6 is achieved because it does not affect the implementation of methods outside the Plan. These will continue to ensure that the risk to people's health and safety from contaminated sites, hazardous substances, or high levels of emissions is minimised with regard to on-site wastewater and stormwater disposal and the discharge of trade and industrial wastes.
- 601. Overall, the proposed changes will improve the efficiency of the Plan by not duplicating functions that exist outside the Plan.
- 602. No practicable alternatives to the preferred option or status quo have been identified or assessed as part of Change F3-4.

17 MINOR 3 WATERS CHANGES

603. The purpose of the minor 3 waters changes is to make small changes of minor effect to clarify or improve provisions as described below.

604. No practicable alternatives to the preferred options or status quo have been identified or assessed for these changes.

Table 16: Minor 3 Waters Changes

Change #	Purpose of the proposal	Amendments included	Assessment
E8 Policy 2.7.1.2.a on structure plans	To clarify Policy 2.7.1.2.a regarding requirements for public infrastructure in structure plans.	Amend Policy 2.7.1.2.a	This change does not have a substantive effect on the policy but is a clarification. Therefore, this is considered to have no measurable effects and has not been reassessed under s32.
F1-1 Rule 9.3.7 Service Connections layout	To review the layout of Rule 9.3.7 to enable other changes to be made.	Amend Rule 9.3.7, including adding new sub-headings (9.3.7.X, 9.3.7.Y, 9.3.7.Z).	This change does not have a substantive impact on the rule. The effect is that each service is considered under a separate sub-heading. Therefore, it has not been assessed in terms of s32.
F1-3 Policy 9.2.1.3 on service connections	To review wording of Policy 9.2.1.3 to ensure it is aligned with the service connections performance standard (Rule 9.3.7) it is linked to.	Amend Policy 9.2.1.3; and Consequential change to assessment Rule 9.5.3.12.	This is a minor clarification to better align the policy wording with the existing rule and to make some minor clarifications to the policy test. As it is not a substantive change to the plan and is considered to have no measurable effects it has not been reassessed under s32.

Change #	Purpose of the proposal	Amendments included	Assessment
F1-4 Policy 2.2.4.5 on where connections to public infrastructure networks are allowed	To review the appropriateness of Policy 2.2.4.5.	Delete Policy 2.2.4.5.	Policy 2.2.4.5 discusses a method that sits outside the Plan (the DCC water bylaw). It is considered that this policy may create confusion as it is only one of two policies in the plan that discusses a method outside the Plan (Policy 2.7.1.2.b being the other). A conscience decision at the time of plan drafting was to not include policies related to methods outside the district plan but rather use the spatial plan to align the district plan with other methods to achieve strategic planning outcomes. This policy remained as an error. An exception to this approach is policy related to National Environmental Standard (NES) rules or other RMA processes. This change is considered to have no measurable effect, so it has not been reassessed under s32.
F1-5 Rule 9.3.3 Firefighting	To review Rule 9.3.3 and its alignment with SNZ/PAS:4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.	Amend Rule 9.3.3	The effect of this change is to clarify the firefighting performance standard (Rule 9.3.3) so it aligns with SNZ/PAS:4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice. It is considered this change will have a positive effect on ensuring firefighting can occur and therefore positive effects in terms of health and safety. Not including this change creates the risk that the firefighting code of practice does not get implemented or considered at the time of building.
F1-6 Policy 2.2.5.2 on on-site stormwater and wastewater management	To review the appropriateness of Policy 2.2.5.2.	Delete Policy 2.2.5.2	This policy has been assessed as inappropriate as: (1) assessing effects on groundwater from on-site discharge is a regional council not a district council matter; (2) it is not implemented in the Plan other than to the degree that on-site wastewater was a consideration for some activities in terms of 'effects on health and safety', however, these provisions are being removed under Change F3-4; (3) it is inconsistent with Style Guide as it is a substantive policy where strategic directions policies should generally be descriptive. It is not considered an efficient or effective approach to implementing Objective 2.2.5. Change F2-2 will more appropriately provide for stormwater management to achieve Objective 2.2.5.

Change #	Purpose of the proposal	Amendments included	Assessment
F1-7 Policy 2.7.1.2.b on Development Contributions Policy and requirements for developers to pay for infrastructure	To review the appropriateness of Policy 2.7.1.2.b	Delete Policy 2.7.1.2.b	Similar to change F1-4, Policy 2.2.4.5 discusses a method that sits outside the Plan (DCC Development Contributions Policy). It is considered that this policy may create confusion as it is one of only two policies that discusses a method outside the Plan (the other being Policy 2.2.4.5). A conscience decision at the time of plan drafting was to not include policies related to methods outside the district plan but rather use the spatial plan to align the district plan with other methods to achieve strategic planning outcomes. This policy remained as an error. An exception to this is policy related to NES rule or other RMA processes. This change is considered to have no measurable effects so has not been reassessed under s32.
F1-8 Policy 2.7.1.2.c on consideration of the long-term costs to the DCC of new infrastructure	To ensure the wording of Policy 2.7.1.2.c reflects that this clause relates to a consideration that should be made at the time of rezoning urban land, not after land is already zoned, which the current wording might imply.	Amend Policy 2.7.1.2.c	The effect of this change is to clarify Policy 2.7.1.2.c so that the assessment of the long term costs of DCC-provided infrastructure is made at the time of a plan change not as part of consents. This change aligns the policy wording with how the plan is implemented so is considered a clarification with no measurable effects and has not been reassessed under s32.

Change #	Purpose of the proposal	Amendments included	Assessment
F2-4 Stormwater methods outside the Plan	To add notes to plan users about the methods that are used to manage stormwater effects that sit outside the Plan, so they are aware of them.	Add new general advice notes for stormwater methods outside the plan at: Note 9.3.7.AAA (service connections); Note 9.9.XA (SWMPs); and Note 15.6.10X (impermeable surfaces)	This change does not add new rules, methods, or requirements. It simply provides information to ensure that requirements already set outside the Plan are highlighted to Plan Users. Therefore, it has not been assessed in terms of s32.
F3-1 and NWRA1-7 GF09 Location of available public wastewater infrastructure	To provide clarification on where public wastewater infrastructure is available for the purposes of the service connections performance standard (Rule 9.3.7)	Add a new definition of wastewater serviced area; Amend Rule 9.3.7; Add Note 9.3.7.ZA (a) and (f); Delete Note 9.3.7A regarding wastewater Mapping of the no DCC reticulated wastewater mapped area over areas shown in Appendix 10 under Changes NWRA1-7 and GF09)	This change does not change the effect of the requirements in the service connections performance standard regarding wastewater connections, it simply provides clarifications. Therefore, it has not been reassessed in terms of s32.

Change #	Purpose of the proposal	Amendments included	Assessment
F3-3 Renaming the ICMA	To rename the 'infrastructure constraint mapped area' so that it is not confused with the new 'stormwater constraint mapped area' proposed under Change F2-7.	Amend Policy 2.6.2.3; Amend Rule 9.5.3.3; Amend Introduction 15.1.1.2; Amend Rule 15.5.2.1 (b and c); Amend Rule 15.5.2.4; Amend Rule 15.7.4.1 (b and c); and Amend Rule 15.10.3.3 Amend name of mapped area in Planning Map	This change does not affect the function of the infrastructure constraint mapped area but simply provides clarification and tidy-ups. Therefore, it has not been assessed in terms of s32.
F4-1 Reference to the DCC Water Bylaw	To clarify the function of the DCC Water Bylaw for plan users as it relates to the service connections performance standard.	Add new Note 9.3.7YA Delete old Note 9.3.7A as it relates to the bylaw	This change does not affect the function of the service connections performance standard. It simply provides information to ensure that requirements already set outside the Plan are highlighted to Plan Users. Therefore, it has not been assessed in terms of s32.

Change #	Purpose of the proposal	Amendments included	Assessment
WCMA1-4 Errors in ICMA mapping	To correct errors in the mapping of the ICMA (now renamed WCMA under Change F3-3) in four locations.	WCMA1: Remove ICMA from the area shown for WCMA1 in Appendix 10. WCMA2: Add WCMA to the area shown for WCMA2 in Appendix 10. WCMA3: Add WCMA to the area shown for WCMA3 in Appendix 10. WCMA4: Add WCMA to the area shown for WCMA4 in Appendix 10.	This change corrects errors in the application of the WCMA that were made in the decision version of the planning maps. This has already been assessed as part of the decisions on the Second Generation Dunedin City District Plan (2GP) and further assessment is not required.

18 CHANGES TO TRIGGERS FOR ADDING HOUSING CAPACITY

18.1 Summary of changes

605. This section describes and assesses proposed changes to:
- a. The approach to the provision of sufficient development capacity in Objective 2.6.2 on Adequate urban land supply and in Policy 2.6.2.1.a for the assessment of proposed residential zoning. This is to ensure these provisions give effect to the National Policy Statement for Urban Development 2020 (NPS-UD) (Change H1); and,
 - b. The residential transition overlay zone provisions, to review the appropriateness of having a housing capacity trigger for release of Residential Transition Overlay Zone (RTZ) land (Change H2).

18.2 Relevant objectives

606. Section 32 (1)(a) of the Act requires an assessment of the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the Act.
607. Section 32(1)(b) of the Act requires an assessment of whether the proposed provisions are the most appropriate way to achieve the objectives or purpose of the proposal. Section 32(3) also requires the proposal to be assessed against the objectives of the Second Generation Dunedin City District Plan (2GP).
608. The relevant 2GP objectives (which are provided in full in Appendix 1) have been identified as:
- a. Objective 2.6.2 Adequate urban land supply
 - b. Objective 2.2.4 Compact and accessible city
 - c. Objective 12.2.1 Transition overlay zones
609. This assessment must:
- a. identify other reasonably practicable options for achieving the objectives;
 - b. assess the efficiency and effectiveness of the provisions in achieving the objectives, including consideration of the benefits and costs anticipated from the implementation of the provisions, and the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions; and
 - c. summarise the reasons for deciding on the provisions.

18.3 Change H1 – Capacity and demand criteria in Policy 2.6.2.1.a

18.3.1 Purpose of proposal and scope of change

- 610. The purpose of this proposal is to review the description of the residential rezoning criteria related to housing development capacity and demand that are in Policy 2.6.2.1.a and align them with the National Policy Statement for Urban Development 2020 (NPS-UD).
- 611. Related to this a minor change to the wording of Objective 2.6.2 to clarify the need to provide sufficient, feasible development capacity to 'at least' meet the demand over the medium term.
- 612. The scope does not include a review of other aspects of Policy 2.6.2.1 as these criteria for zoning have recently been through a review process as part of the 2GP and have been settled. It also does not include a review of Objective 2.6.2 (other than to clarify the matter identified).
- 613. Limiting the scope of review as described above will enable site assessments to occur with a settled policy framework. Opening the provisions up for a broader review could delay the ability to implement changes to zoning to add housing capacity.

18.3.2 Background and issues of concern

- 614. The following issues have been identified with Objective 2.6.2 and Policy 2.6.2.1.a:
 - a. Policy 2.6.2.1.a sets a limit on rezoning land by requiring that there is a shortage of capacity over the short term (5 years) before land can be rezoned to a residential zone. This policy criterion has been reviewed taking into account the NPS-UD, and it is considered that it does not reflect the NPS-UD Policy 2, outlined below.
 - b. Objective 2.6.2 similarly does not fully reflect the requirement to provide 'at least' sufficient development capacity.
- 615. NPS-UD Policy 2 states:

Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.
- 616. Implementation section 3.2 of the NPS-UD states:

3.2 Sufficient development capacity for housing

1) Every tier 1, 2, and 3 local authority must provide at least sufficient development capacity in its region or district to meet expected demand for housing:

 - a) in existing and new urban areas; and*
 - b) for both standalone dwellings and attached dwellings; and*
 - c) in the short term, medium term, and long term.*

2) In order to be sufficient to meet expected demand for housing, the development capacity must be:

- a) plan-enabled (see clause 3.4(1)); and*
- b) infrastructure-ready (see clause 3.4(3)); and*
- c) feasible and reasonably expected to be realised (see clause 3.26); and*
- d) for tier 1 and 2 local authorities only, meet the expected demand plus the appropriate competitiveness margin (see clause 3.22).*

617. 'Plan enabled', in relation to short and medium term housing capacity, is land that is zoned for housing use in an operative or proposed district plan. 'Plan enabled' in relation to long term housing capacity is land identified a for future urban use or intensification in a Future Development Strategy. The plan must therefore zone land for the short and medium terms, but not the long term.

618. Objective 2.6.2 states:

Dunedin provides sufficient, feasible, development capacity (as intensification opportunities and zoned urban land) in the most appropriate locations to meet the demand over the medium term (up to 10 years), while sustainably managing urban expansion in a way that maintains a compact city with resilient townships as outlined in Objective 2.2.4 and policies 2.2.4.1 to 2.2.4.3.

619. Policy 2.6.2.1.a states:

Identify areas for new residential zoning based on the following criteria:

- a. rezoning is necessary to meet a shortage of residential capacity (including capacity available through releasing a Residential Transition overlay zone), either:*
 - i. in the short term (up to 5 years); or*
 - ii. in the medium term (up to 10 years), in which case a Residential Transition overlay zone is applied to the rezoned area; and...*

620. The full content of Policy 2.6.2.1 can be found in Appendix 1.

18.3.3 Proposed change and assessment

621. In relation to Objective 2.6.2, the preferred option is to amend the objective to clarify that capacity must be provided to "at least" meet the demand over the medium term. This change is shown below.

Dunedin provides sufficient, feasible, development capacity (as intensification opportunities and zoned urban land) in the most appropriate locations to at least meet ~~the~~ demand over the medium term (up to 10 years) while sustainably managing urban expansion in a way that maintains a compact city with resilient townships as outlined in Objective 2.2.4 and policies 2.2.4.1 to 2.2.4.3.

622. For Policy 2.6.2.1.a, the preferred option is to amend the clause to simplify the explanation of the criteria related to demand and capacity to only refer to needing to meet demand over the short and medium term. This change is shown below:

Identify areas for new residential zoning based on the following criteria:

- a. Rezoning is necessary to ensure provision of at least sufficient housing capacity to meet expected demand over the short and medium term; ~~meet a shortage of residential capacity (including capacity available through releasing a Residential Transition overlay zone)~~; either:
 - ~~i. in the short term (up to 5 years); or~~
 - ii. ~~in the medium term (up to 10 years), in which case a Residential Transition overlay zone is applied to the rezoned area; and~~*

18.3.3.1 Assessment against the purpose of the Act

- 623. Policy 2.6.2.1.a currently requires that land can *only* be rezoned if there is a shortage of capacity in the short term (five years). This is contrary to the NPS-UD Policy 2, which requires that at least sufficient land must be zoned in the Plan to meet expected demand for housing for the medium term (10 years). The proposed change therefore ensures consistency with, and gives effect to, the NPS-UD, as required by section 75(3) of the Act.
- 624. Likewise, adding 'at least' into Objective 2.6.2 ensures that the objective is also consistent with the NPS-UD.
- 625. Achieving consistency with the NPS-UD is required by the Act and is therefore the most appropriate way to ensure the proposal meets the purpose of the Act.

18.3.3.2 Assessment against Objective 2.6.2 – Adequate urban land supply

- 626. The change to Policy 2.6.2.1.a is the most appropriate means of achieving Objective 2.6.2 (including as clarified in the objective wording).
- 627. No practicable alternatives to the preferred option and status quo have been identified or assessed for Change H1.

18.4 Change H2 – Housing Capacity Trigger for RTZ release

18.4.1 Purpose of proposal and scope of change

- 628. The purpose of the proposal is to review the appropriateness of having a housing capacity trigger for release of Residential Transition Overlay Zone (RTZ) land. The scope of this change does not include other changes to the RTZ provisions, including the other release criteria.

18.4.2 Background and issues of concern

- 629. Policy 2.2.4.3 states:

Ensure expansion of urban areas occurs in the most appropriate locations and only when required by:

- a. use of transition overlay zones to identify areas to provide for future residential, commercial and industrial needs; and appropriate criteria for the release of land based on:*

- i. *public infrastructure provision; and*
 - ii. *for residential and commercial and mixed use zoned land, a shortage of capacity.*
 - b. *encouraging applications for any subdivision that fundamentally changes rural land to residential land to be processed as a plan change; and*
 - c. *requiring any alternative development areas suggested via a plan change process to demonstrate that the proposed zoning is the most appropriate in terms of the objectives and policies contained within these strategic directions, and including that for residential zoning, the proposal is appropriate in terms of the criteria contained in Policy 2.6.2.1.*
630. Policy 2.2.4.3 and the related provisions in Section 12 provide for the release of land within transition overlay zones when there is a shortage of residential capacity within the RTZ residential capacity assessment mapped area. This mapped area encompasses all of urban Dunedin and some of the surrounding rural area.
631. This approach is outlined in Policy 12.2.1.1:
- In the Residential Transition Overlay Zone (RTZ) provide for land to transition to residential zone land through a certification process by the Chief Executive Officer or their delegate when:*
- a. *the estimated total residential capacity is less than 120% of the projected total residential demand in the **RTZ residential capacity assessment mapped area** over the next five years;*
 - b. ...
632. The purpose of this change is to review the appropriateness of the requirement for a shortage of capacity in the next five years before RTZ areas are released for residential development.
633. The need to meet a capacity test was included in the 2GP at a time that Dunedin was a low growth city. The provisions were designed to prevent too much urban expansion (and the associated potential financial effects on DCC of unnecessary or inefficient infrastructure expansion).
634. This growth context is no longer the case, and there has been a significant unanticipated increase in Dunedin's rate of growth in recent years. As outlined earlier in this report, Dunedin is projected to have a significant shortfall in housing development capacity over the short, medium and long terms (to 30 years).
635. Based on this change in growth context, it is considered that the shortage of capacity trigger is no longer necessary, as the issue that it was trying to manage is no longer an issue for the city.
636. In addition, the requirement in Rule 12.3.1 that RTZ can only be released for residential development when there is a shortage of capacity in the next five years is not consistent with the requirements of the NPS-UD, which requires there is at least sufficient development

capacity to meet 10 years demand. In this respect, the change is similar to those discussed under Change H1.

637. Consequently, the restriction on the release of RTZ land is considered inappropriate and unnecessary. It would be more efficient if RTZ sites could be 'released' for development as soon as they could be serviced with public infrastructure.

18.4.3 Proposed change and assessment

638. The preferred option is to remove the shortage of capacity trigger for the release of RTZ land in Rule 12.3.1 and make related and consequential changes to relevant policies and other provisions.

639. Change H2 includes the following changes:

- a. Amend Policy 2.2.4.3;
- b. Amend Rule 12.1 Introduction;
- c. Amend Policy 12.2.1.1;
- d. Amend Rule 12.3.1; and
- e. Amend the 2GP planning maps by deleting the RTZ residential capacity assessment mapped area.

18.4.3.1 Assessment against Objective 2.2.4 - Compact and accessible city

640. Objective 2.2.4 states:

Dunedin stays a compact and accessible city with resilient townships based on sustainably managed urban expansion.

641. Change H2 is appropriate in terms of Objective 2.2.4 as removing the capacity trigger for RTZ release does not interfere with the promotion of a compact and accessible city. The determination under Policy 2.6.2.1 that an area is suitable for residential development, which takes place when an RTZ is initially identified, explicitly considers this objective. In addition, Objective 2.7.1 and Policy 2.7.1.1 require that the zoning of land considers public infrastructure capacity, ensuring that an excess of land that cannot be serviced will not be identified as RTZ.

642. Overall, the amendments proposed by Change H2 will ensure that Objective 2.2.4 is better achieved.

18.4.3.2 Assessment against Objective 12.2.1 – RTZ release

643. Objective 12.2.1 states:

Land within the Residential Transition Overlay Zone (RTZ) is able to be released and developed in a coordinated way as residential zoned land, in advance of the need for additional residential capacity to accommodate growth.

644. Removal of the requirement to demonstrate a shortage of capacity will better achieve Objective 12.2.1, as it is arguable that the existing requirement to demonstrate a shortage of

capacity within five years would achieve the requirement in the objective to enable development of land *in advance of the need for additional residential capacity to accommodate growth*. This is because of the time required from release to development of housing is often several years, due to the planning, regulatory processes and physical works involved.

645. No practicable alternatives to the preferred option and status quo have been identified or assessed as part of Change H2.

19 REJECTED CHANGE

19.1 Rejected Change RC1 - Notification rules

19.1.1 Purpose of the rejected change

646. The purpose of this rejected option was to review Rule 15.4 and specifically consider whether to add further non-notification rules for some types of consents for residential activity, development and subdivision, where the effects of proposals are likely to be limited to on-site effects, or broader effects on residential character or amenity that are best assessed by a suitably qualified expert.

19.1.2 Background and issues of concern

647. Under the current notification provisions in the Act, consents must be publicly notified if there are adverse effects on the environment that are more than minor, as well as in other circumstances (see section 95A). If public notification is not required, the consent authority determines whether any person is adversely affected (section 95E) and these affected persons must be notified (section 95B). Both public notification and limited notification can take place if special circumstances warrant it.
648. The Second Generation Dunedin City District Plan (2GP) includes rules regarding notification of consents in the residential zones in Rule 15.4 Notification. This includes rules that require notification or preclude notification.
649. Consultation with developers has identified that there is a perception of consenting risk associated with uncertainty over whether consent applications will be publicly or limited notified. Notification can significantly increase the costs of pursuing a development and can cause the consent process to take much longer. Providing developers with increased certainty over the consent process may improve the take-up of development opportunities.

19.1.3 Rejected change and assessment

650. The proposal that was assessed and rejected was to include additional non-notification rules relating to resource consents required for some restricted discretionary land use and development rules, where the effects of proposals are likely to be limited to on-site effects, or broader effects on residential character or amenity and other matters that are best assessed by a suitably qualified expert. In such cases, consents are unlikely to be publicly notified due to the matters of discretion that apply and the nature of likely effects with respect to these matters.
651. It is noted that non-notification rules could not be considered where there is a reasonable expectation that public notification may be required due to the nature of effects, as this would undermine the ability of the DCC to carry out its functions under the Act.

19.1.3.1 *Assessment against Objective 2.6.2 – Adequate urban land supply*

652. The change would not add housing capacity per se. However, it may improve the perception of the feasibility of some developments through a guaranteed non-notification process. This

may encourage some developers to proceed with proposals that they might otherwise not proceed with if they needed to gain written approvals or if notification was a possibility. These factors may result in a small increase in actual housing development.

19.1.3.2 *Other effectiveness, efficiency and cost considerations*

653. There are several factors why the addition of non-notification rules is not supported. Such rules add complexity to the 2GP and are difficult to formulate to work around all potential consenting circumstances and the effects of all proposals. As such, non-notification rules may result in perverse outcomes for some consent applications where notification or written approvals are precluded.
654. It is also noted that the potential for notification, or the need to obtain written approval from neighbours, can be used to encourage developers to put forward better designed proposals and achieve better outcomes in terms of achieving the relevant objectives of the Plan.
655. Finally, advice from the DCC Resource Consents team is that applications that only have matters of assessment that refer to on-site effects, or effects assessed by experts, are typically non-notified anyway (assuming effects are no more than minor). These applications do not generally involve neighbours. Therefore, adding additional non-notification rules is unlikely to result in any change in consent processing in practice.
656. The RMA provides a clear path for non-notification of proposals, and it is considered that this should be followed for all applications not currently covered under Rule 15.4, relying on the discretion of the consents processing officers to determine when effects are more than minor and when other persons are affected.

20 ASSESSMENT OF SITES FOR REZONING TO RESIDENTIAL

20.1 Purpose of proposal and scope of change

657. In the context of needing to identify additional residential capacity, the purpose of the proposal is to assess the appropriateness of rezoning a number of identified sites.
658. The sites that were assessed as part of this proposal include the sites that are proposed for rezoning outlined in Section 20.4 , and those that were assessed but are not being proposed for rezoning in Variation 2, which are listed in Appendix 4. The sites that were assessed but are not proposed for rezoning in Variation 2 do not meet (or there is insufficient information to be confident that they would be likely to meet) relevant policy assessment criteria.
659. Variation 2 does not include a full review of zoning in the city, but instead a limited review of the zoning of some sites. The scope of the proposals to rezone land includes the need for specific plan provisions (for example overlays or site specific rules) to manage adverse effects of development of the sites being rezoned.
660. Review of the zoning of sites outside those considered (and identified in Section 20.4 / Appendix 4) is not within the scope of this proposal.
661. The sites that were evaluated included sites being considered for rezoning:
- a. to General Residential 2 Zone from General Residential 1, Rural, Major Facility, Industrial and Rural Residential zones;
 - b. to General Residential 1, Township and Settlement and Large Lot Residential 1 from Rural, Rural Residential, Large Lot Residential and Industrial zones; and
 - c. to Recreation Zone from Rural Zone.

20.2 Planning background

662. The overall background to Variation 2 and relevant objectives in the Plan are discussed in Section 5. The objectives and policies most relevant to assessing the appropriateness of zoning are discussed in more detail below.

20.2.1 Housing capacity and the tests for rezoning

663. The key strategic direction objective relevant to ensuring there is sufficient housing capacity is Objective 2.6.2. This objective relates directly to housing capacity and is proposed to be amended through Change H1. The amended wording is:

Dunedin provides sufficient, feasible, development capacity (as intensification opportunities and zoned urban land) in the most appropriate locations to at least meet ~~the~~ demand over the medium term (up to 10 years) while sustainably managing urban expansion in a way that maintains a compact city with resilient townships as outlined in Objective 2.2.4 and policies 2.2.4.1 to 2.2.4.3.

664. The key policy implementing Objective 2.6.2 is Policy 2.6.2.1. Policy 2.6.2.1 outlines the relevant considerations for zoning land to residential and includes reference to a number of

relevant objectives that must be considered when residential zoning decisions are made. These include objectives such as those relating to a compact city, efficient provision of infrastructure, maintaining significant natural values such as landscape, coastal character and biodiversity, and consideration of natural hazards. In some cases, policies under these objectives assist in determining how they should be applied in zoning decisions. The relevant objectives and policies are listed in Appendix 1.

665. Policy 2.6.2.1 is also proposed to be amended through Change H1. The amended policy reads:

Identify areas for new residential zoning based on the following criteria:

- ~~b.~~ *rezoning is necessary to ensure provision of at least sufficient housing capacity to meet expected demand over the short and medium term ~~meet a shortage of residential capacity (including capacity available through releasing a Residential Transition overlay zone)~~, either:*
 - ~~i.~~ *~~in the short term (up to 5 years); or~~*
 - ~~ii.~~ *~~in the medium term (up to 10 years), in which case a Residential Transition overlay zone is applied to the rezoned area; and~~*
- c. rezoning is unlikely to lead to pressure for unfunded public infrastructure upgrades, unless either an agreement between the infrastructure provider and the developer on the method, timing, and funding of any necessary public infrastructure provision is in place, or a Residential Transition overlay zone is applied and a future agreement is considered feasible; and*
- d. the area is suitable for residential development by having all or a majority of the following characteristics:*
 - i. a topography that is not too steep;*
 - ii. being close to the main urban area or townships that have a shortage of capacity;*
 - iii. currently serviced, or likely to be easily serviced, by frequent public transport services;*
 - iv. close to centres; and*
 - v. close to other existing community facilities such as schools, public green space and recreational facilities, health services, and libraries or other community centres; and*
- e. considering the zoning, rules, and potential level of development provided for, the zoning is the most appropriate in terms of the objectives of the Plan, in particular:*
 - i. the character and visual amenity of Dunedin's rural environment is maintained or enhanced (Objective 2.4.6);*
 - ii. land, facilities and infrastructure that are important for economic productivity and social well-being, which include industrial areas, major facilities, key transportation routes, network utilities and productive rural*

land: are protected from less productive competing uses or incompatible uses, including activities that may give rise to reverse sensitivity; and

- 1. in the case of facilities and infrastructure, are able to be operated, maintained, upgraded and, where appropriate, developed efficiently and effectively (Objective 2.3.1).*
 - 2. Achieving this includes generally avoiding areas that are highly productive land or may create conflict with rural water resource requirements;*
- iii. Dunedin's significant indigenous biodiversity is protected or enhanced, and restored; and other indigenous biodiversity is maintained or enhanced, and restored; with all indigenous biodiversity having improved connections and improved resilience (Objective 2.2.3). Achieving this includes generally avoiding the application of new residential zoning in ASBV and UBMA;*
- iv. Dunedin's outstanding and significant natural landscapes and natural features are protected (Objective 2.4.4). Achieving this includes generally avoiding the application of new residential zoning in ONF, ONL and SNL overlay zones;*
- v. the natural character of the coastal environment is, preserved or enhanced (Objective 2.4.5). Achieving this includes generally avoiding the application of new residential zoning in ONCC, HNCC and NCC overlay zones;*
- vi. subdivision and development activities maintain and enhance access to coastlines, water bodies and other parts of the natural environment, including for the purposes of gathering of food and mahika kai (Objective 10.2.4);*
- vii. the elements of the environment that contribute to residents' and visitors' aesthetic appreciation for and enjoyment of the city are protected or enhanced. These include:*
 - 1. important green and other open spaces, including green breaks between coastal settlements;*
 - 2. trees that make a significant contribution to the visual landscape and history of neighbourhoods;*
 - 3. built heritage, including nationally recognised built heritage;*
 - 4. important visual landscapes and vistas;*
 - 5. the amenity and aesthetic coherence of different environments; and*
 - 6. the compact and accessible form of Dunedin (Objective 2.4.1);*
- viii. the potential risk from natural hazards, and from the potential effects of climate change on natural hazards, is no more than low, in the short to long term (Objective 11.2.1);*

- ix. *public infrastructure networks operate efficiently and effectively and have the least possible long term cost burden on the public (Objective 2.7.1);*
- x. *the multi-modal land transport network, including connections between land air and sea transport networks, operates safely and efficiently (Objective 2.7.2); and*
- xi. *Dunedin stays a compact and accessible city with resilient townships based on sustainably managed urban expansion. Urban expansion only occurs if required and in the most appropriate form and locations (Objective 2.2.4).*

666. As outlined under Change H1, clause (a) of Policy 2.6.2.1 is proposed to be amended as it is not consistent with the National Policy Statement on Urban Development 2020 (NPS-UD). The NPS-UD also requires that housing capacity is 'infrastructure-ready'. For short term capacity adequate infrastructure must be in place; for medium term capacity, funding for adequate infrastructure is identified in a long-term plan, and for long-term capacity, funding must be identified in the DCC's infrastructure strategy³⁷.
667. The approach taken in Variation 2 to determine whether land should be rezoned to residential, or identified as a Residential Transition Overlay Zone, follows the approach in the NPS-UD. That is, land will be zoned to at least meet the medium-term demand, providing infrastructure is in place or funding is included in the DCC's Long Term Plan (LTP). Land that cannot be serviced within 10 years may be identified for long term development through application of a Residential Transition Overlay Zone, provided funding is identified in the infrastructure strategy. As Variation 2 is concerned only with medium term capacity, no Residential Transition Overlay Zone sites are proposed.
668. A further matter to note is that Policy 2.6.2.1 does not include Objective 2.5.1, which is that Kāi Tahu can exercise kaitiakitaka over resources within their takiwā. This is also a relevant consideration and has been included in the assessment.

20.2.2 Medium density zoning

669. Policy 2.6.2.3 outlines the criteria for zoning land to a medium density zoning (General Residential 2 or Inner City Residential). It first requires alignment with Policy 2.6.2.1 (which is assumed to already be the case if land has been zoned residential), then lists additional considerations, including referencing relevant objectives. Policy 2.6.2.3 is also proposed to be amended through Change F3-3, F2-7 and E4. The amended policy reads:

Identify areas for new medium density zoning based on the following criteria:

- a. *alignment with Policy 2.6.2.1; and*
- b. *rezoning is unlikely to lead to pressure for unfunded public infrastructure upgrades, unless either an agreement between the infrastructure provider and the developer on the method, timing, and funding of any necessary public infrastructure provision is in place, or an infrastructure wastewater constraint mapped area {Change F3-3} or a stormwater constraint mapped area {Change F2-7} is applied; and*

³⁷ National Policy Statement on Urban Development, Policy 2, Implementation parts 3.2, and 3.4

- c. *considering the zoning, rules, and potential level of development provided for, the zoning is the most appropriate in terms of the objectives of the Plan, in particular:*
 - i. *there is a range of housing choices in Dunedin that provides for the community's needs and supports social well-being (Objective 2.6.1);*
 - ii. *Dunedin reduces its environmental costs and reliance on non-renewable energy sources as much as practicable, including energy consumption, water use, and the quality and quantity of stormwater discharge, {Change E4} and is well equipped to manage and adapt to changing or disrupted energy supply by having reduced reliance on private motor cars for transportation (Objective 2.2.2), including through one or more of the following:*
 - 1. *being currently serviced, or likely to be easily serviced, by frequent public transport services; and*
 - 2. *being close (good walking access) to existing centres, community facilities such as schools, public green spaces recreational facilities, health services, and libraries or other community centres; and*
 - iii. *the elements of the environment that contribute to residents' and visitors' aesthetic appreciation for and enjoyment of the city are protected or enhanced. These include:*
 - 1. *important green and other open spaces, including green breaks between coastal settlements;*
 - 2. *trees that make a significant contribution to the visual landscape and history of neighbourhoods;*
 - 3. *built heritage, including nationally recognised built heritage;*
 - 4. *important visual landscapes and vistas;*
 - 5. *the amenity and aesthetic coherence of different environments;*
 - 6. *the compact and accessible form of Dunedin (Objective 2.4.1); and*
 - iv. *the potential risk from natural hazards, and from the potential effects of climate change on natural hazards, is no more than low, in the short to long term (Objective 11.2.1); and*
- d. *the area is suitable for medium density housing by having all or a majority of the following characteristics:*
 - i. *lower quality housing stock more likely to be able to be redeveloped;*
 - ii. *locations with a topography that is not too steep;*
 - iii. *locations that will receive reasonable levels of sunlight; and*
 - iv. *market desirability, particularly for one and two person households.*

20.2.3 Housing choice and compact city

670. Objective 2.6.1 and Policy 2.6.1.1 require that a range of housing choices are provided for. This includes an appropriate mix of infill development, redevelopment, and greenfield development.

671. Objective 2.2.4 is that Dunedin stays a compact and accessible city with resilient townships based on sustainably managed urban expansion. Policy 2.2.4.1 outlines that land should be used efficiently, and residential zoning should be at the highest appropriate density (medium density or General Residential 1 density), with less dense zoning (i.e. large lot zoning or use of a structure plan to require a lower density) used only when environmental factors prevent development at a higher density.

20.3 Site assessment methodology

672. As part of preparatory work on a Future Development Strategy (FDS), a Geographic Information System (GIS) scoring exercise was undertaken to identify land that could potentially meet the criteria in 2GP Policy 2.6.2.1 (for new residential zoning) and Policy 2.6.2.3 (for new medium density zoning). This was not a full assessment of sites or a comprehensive review of existing zoning across the whole city but was instead limited to identifying sites that were most likely to meet these criteria and so best placed to provide capacity for the medium term.
673. The scoring method used to identify sites was focussed on criteria that could be readily assessed and weighted at a high level by using GIS datasets which were relevant to the criteria, such as Second Generation District Plan (2GP) overlays and mapped areas.
674. The scoring included:
- a. 'Knock-out' criteria, which identified areas which were not considered for rezoning (e.g. areas with significant natural hazards or natural landscapes);
 - b. Negative scores for environmental characteristics that could result in adverse environmental effects and misalignment with Policy 2.6.2.1 and 2.6.2.3 (such as highly productive land or certain natural hazards); and
 - c. Positive scores for environmental characteristics that would be desirable for new urban areas and result in alignment with Policy 2.6.2.1 and 2.6.2.3 (such as proximity to services).
675. Due to the high-level nature of the scoring method, only large areas that had a consistent high score were taken forward for assessing for Variation 2.
676. In addition to the scoring exercise, a wide range of sites were identified through consultation with stakeholders, including local planners, surveyors, and developers. A key benefit of this approach was the knowledge that these sites were likely to get developed if rezoned.
677. Sites derived from the GIS exercise and sites identified through consultation were then assessed against the policy criteria outlined above, in particular the criteria and objectives referenced in Policy 2.6.2.1 and (for potential medium density sites) Policy 2.6.2.3. Greenfield sites were generally initially assessed for a General Residential 1 Zone density. In some cases, this was found to be unsuitable and the site was re-assessed at a large lot density, in accordance with Policy 2.2.4.1. The assessment took into account methods that could be used to manage any issues that were identified. If any site or area did not meet a significant criterion (for example ability to appropriately and cost effectively service the site for infrastructure within the next 10 years, or a knock out criterion such as overlap with a significant landscape overlay), it was removed from the process and no further assessment

was undertaken. These sites are listed in Appendix 4. Note that the reasons given in Appendix 4 for not progressing a site for rezoning are not necessarily complete, as assessment ceased once a site was considered unsuitable for any reason.

- 678. Appendix 5 outlines the assessment method, scoring used, and further comments in relation to each criterion considered. Most of the sites and areas that are proposed to be rezoned have a summary sheet of the site assessment in Appendix 6.
- 679. Additional comments in relation to some of the scoring criteria are made below.

20.3.1 Rural character and visual amenity

- 680. Objective 2.4.6 is referenced in Policy 2.6.2.1 as a relevant consideration for rezoning land to residential. The objective requires that the character and visual amenity of Dunedin's rural environment is maintained or enhanced. The associated policies relate to identification of the different character and amenity values in rural land, which is implemented through application of various rural zones and the values listed in Appendix A7 to the 2GP; and maintaining those values through management of subdivision and development activities and the density of residential activity in rural zones. These requirements are implemented through rules and policies in Section 16 – Rural Zones. While Objective 2.4.6 is referenced in Policy 2.6.2.1, the policies underneath it does not refer to managing zoning decisions.
- 681. All zoning to residential will result in loss of rural character and amenity, replacing it with a residential character. It is not considered that Objective 2.4.6 requires a protection of all rural character and amenity values, as this would prevent new residential zoning. Therefore, while an assessment has been made of the relative value of the rural environment in each location and the likely effects on it, in general relatively little weight has been placed on meeting this objective in terms of supporting rezoning of new sites.

20.3.2 Impacts on highly productive land

- 682. Policy 2.6.2.1.d.ii references Objective 2.3.1. This objective includes the requirement that land that is important for economic productivity, which includes productive rural land, is protected from less productive competing uses or incompatible uses. Policy 2.6.2.1 notes that achieving this includes generally avoiding areas that are highly productive land or may create conflict with rural water resource requirements.
- 683. Highly productive rural land is defined in the 2GP as: "Land that has the ability to sustain the production of a wide variety of plants including horticultural crops, through a combination of land, soil and climate attributes". For the purposes of this assessment, it is limited to Land Use Capability Classes 1, 2 and 3 and land mapped as high class soils on the 2GP maps.
- 684. A high-level cost benefit assessment was undertaken for sites assessed as having highly productive land (HPL) or mapped as having high class soils³⁸. This assessment provided some quantification of the costs of lost productivity over the long term, but no quantification of benefits of housing, which was assessed qualitatively, based on factors such as the number of sites (and therefore efficiency of development), and proximity to existing services.

³⁸ Dunedin Productive Land Cost Benefit Analysis (Property Economics and Beca, November 2020). Note: this assessment also includes several appeal sites that are not within the scope of Variation 2.

685. Sites (and areas that included separate sites) smaller than 4ha were considered to contribute no or minimal primary productive potential.
686. To provide context, Dunedin's contribution to national primary productivity is very small (0.9%). Approximately 32,000ha of Dunedin's land area is identified as highly productive land, of which approximately 350ha (1%) has been assessed for rezoning through Variation 2 or through resolution of 2GP appeals.

20.3.2.1 *Residential character and amenity*

687. Both policies 2.6.2.1 and 2.6.2.3 reference Objective 2.4.1, which requires that "the elements of the environment that contribute to residents' and visitors' aesthetic appreciation for and enjoyment of the city are protected or enhanced. These include: ...the amenity and aesthetic coherence of different environments". This is a particular consideration in decisions on medium density zoning, as intensification has the potential to alter existing residential character through infill, and the removal and replacement of single larger houses and gardens with multi-unit developments. This can change the built form, style and remove open space and green character.
688. NPS-UD Policy 6(b) states that changes in built form in an area may detract from amenity values appreciated by some people, but improve amenity values appreciated by other people, including by providing increased and varied housing densities and types. It also states that those changes in built form are not, of themselves, an adverse effect. While changes resulting from intensification are not necessarily an adverse effect, there was significant concern about the impact of intensification on some residential areas during the 2GP process. As a result, the proposed new medium density areas have been assessed (see Appendix 9). In a small number of cases, boundaries have been adjusted from those initially assessed to remove areas where it is considered that the potential adverse effects from intensification on areas with very high character values was not outweighed by the potential positive effects from increased housing that were over and above the changes that are already being proposed through changes to the General Residential 1 rules.

20.3.2.2 *Impacts on values of significance to Manawhenua*

689. Te Rūnanga o Ngāi Tahu, a body corporate established under the Te Rūnanga o Ngāi Tahu Act 1996 (the TRoNT Act), is the tribal representative body of Ngāi Tahu Whānui (including Waitaha, Kāti Mamoe and Kāi Tahu). Section 15(1) of the TRoNT Act prescribes that "Te Rūnanga o Ngāi Tahu shall be recognised for all purposes as the representative of Ngāi Tahu Whānui."
690. Section 15(2) of the TRoNT Act 1996 states that "where any enactment requires consultation with any iwi or with any iwi authority, that consultation shall, with respect to matters affecting Ngāi Tahu Whānui, be held with Te Rūnanga o Ngāi Tahu".
691. DCC understands from previous consultation in relation to the 2GP that it is the acknowledged practice of Te Rūnanga o Ngāi Tahu that consultation in the first instance is with Papatipu Rūnanga. There are two papatipu rūnanga in Dunedin, namely Kāti Huirapa Rūnaka ki Puketeraki and Te Rūnanga o Ōtākou. Consultation was undertaken with these Rūnaka via their consultancy, Aukaha, in relation to the proposed growth areas. The areas

being assessed for possible rezoning were not disclosed to Aukaha as these were treated as confidential until landowners had been informed; however, indicative numbers of new dwellings in various catchments were provided to them and broad details of possible sites near the coastal marine area, waterways and overlapping with wāhi tupuna areas, were provided. The numbers of new dwellings included potential development that may result from resolution of 2GP appeals, which are currently being mediated.

- 692. The concerns raised by the Rūnaka related to impacts on water quality, both generally in relation to self-serviced sites, and specifically for sites in the Waitati area, and overlap with particular wāhi tupuna areas.
- 693. No sites in the Waitati area were assessed for inclusion in Variation 2. For sites that will be self-serviced, proximity to a waterbody was considered. Only part of one site overlapped a wāhi tupuna area of concern, and this area is not being proposed for rezoning.

20.3.2.3 *Issues for network utility providers*

- 694. Consultation was undertaken with a variety of infrastructure service providers in relation to proposed growth areas. The areas being assessed for possible rezoning were not disclosed to the providers as these were treated as confidential until landowners had been informed; however, indicative numbers of new dwellings in various catchments were provided to them. These figures included potential new dwellings that may result from resolution of 2GP appeals, which are currently being mediated.
- 695. In brief, the following comments were received:
 - a. No issues were raised in relation to the proposed Variation 2 sites by Aurora, OtagoNet or Fire and Emergency New Zealand. Comments were made in relation to Waitati township; however, there are no sites proposed to be rezoned under Variation 2 within Waitati.
 - b. Transpower raised issues in relation to potential effects on the national grid. Transpower has appealed 2GP provisions relating to the National Grid and would be opposed to any rezoning or plan provisions which provide for development or intensification within the National Grid Corridor. None of the proposed sites are within the National Grid Corridor.
 - c. Chorus raised no issues in terms of servicing the proposed sites. Most proposed rezoning areas are within the Ultra Fast Broadband (UFB) boundaries and would be covered by standard UFB greenfields process. Areas outside the UFB could be serviced, provided they are built from the outside in.
 - d. 2 degrees raised the need to adequately service new sites for mobile data and encouraged a planning system whereby developers fund infrastructure that can be co-located upon by different mobile service providers.
 - e. The Ministry of Education raised concerns that there is a risk that demand the Green Island School catchment could exceed the current capacity of the school if all the dwelling capacity was developed.

- f. KiwiRail supported the use of existing 2GP provisions (in particular requirements for acoustic insulation) for managing reverse sensitivity issues arising from residential development next to the rail corridor. The setback provisions in the 2GP are also relevant and are currently under appeal by KiwiRail. Using existing zoning and provisions (rather than bespoke zoning and rules) would ensure that the agreed setback provisions apply, once the appeal is settled.
- g. Public Health South was consulted in relation to public health issues. It noted its preference for 3 waters reticulation rather than self-servicing for wastewater and water supply, and raised issues of connectivity, safety and accessibility in relation to subdivision design.

20.4 Sites proposed for rezoning - individual site assessments

696. This section summarises the assessment of the sites and areas proposed for rezoning and should be read in conjunction with the relevant site assessment sheet in Appendix 6 and site maps in Appendix 10. This section includes any methods proposed to manage issues associated with rezoning. For all greenfield sites, ensuring that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way, is a relevant consideration. In all cases, therefore, a 'new development mapped area' (NDMA), as discussed in Change D, is proposed for undeveloped sites or areas being rezoned to General Residential 1 or General Residential 2.

20.4.1 155 and 252 Scroggs Hill Road, Brighton (GF01)

697. This site is 10.3ha in area and is part of a rural residential zoned property immediately to the north of Brighton. The site is currently farmed. Due to difficulties servicing the site for wastewater and water supply, the proposal is for zoning to Large lot Residential 1 Zone.
698. The site was identified for review in Variation 2 due to an existing appeal on the zoning of the site that due to scope issues was difficult to resolve through the mediation process.
699. The area proposed for rezoning is a smaller part of a much larger site assessed (see Appendix 6.1). The remainder of the site was rejected for rezoning based on the visual impact, a lack of demand for a significant area of new zoning in Brighton and the costs outlined below, which increase as a result of the larger area.
700. See Appendix 6.1 for the site assessment summary.

20.4.1.1 Benefits

701. This area proposed for rezoning is elevated and slopes gently to the east, providing for good solar access.

20.4.1.2 Costs

702. The site is relatively distant from Brighton neighbourhood centre (2km) and the nearest bus route (1.6km). Big Rock Primary School is 2.3km away. While the site is not adjacent to residential zoned land, it has the feeling of being connected, due to existing development along Scroggs Hill Road between the site and the residential zoned area.

703. Rezoning will result in a loss of highly productive land. This area scored poorly compared to other sites given the size of the site initially assessed (a much larger area), the relatively low density of housing, and the distance from services (which reduces the economic value attached to housing). However, given the reduced area proposed for zoning, impacts are considered to be moderate, rather than significant.
704. The site was assessed by DCC's Landscape Architect (see Appendix 7) for potential large lot scale development. The full site covers a series of broad ridges and gullies northwest of Brighton. In general, the area proposed for zoning is hidden from view from many of the more established urban parts of Brighton near the centre of the settlement and the south-eastern facing hillslopes near the coastal edge. Broader views into the site are available from immediate surrounding locations on Scroggs Hill Road, and the hillslopes to the west, east and north. Residential development will change the existing rural / rural residential character. Siting the development on the lower, less prominent part of the site would lessen this effect.
705. The site is assessed as having a medium level hazard associated with slope instability, particularly on the steeper parts of the site. Geotechnical investigation will be required prior to development.
706. This site is outside the area that is serviced by DCC, so self-servicing for water would be required. However, the site is assessed as constrained for self-servicing, with water expected to be available 75% of year (assuming the maximum permitted building coverage area for rainfall collection with a 25m³ tank).
707. A significant network extension would be required to service the site for wastewater. The local wastewater infrastructure is relatively flat in places and so capacity issues for additional flow exist in part of the network. Significant downstream network upgrades would be required and are budgeted in draft 10 Year Plan. Self-servicing (Large Lot Residential zoning) is feasible.
708. Stormwater attenuation would be required to manage erosion issues and potential flooding downstream.
709. Local transport improvements will be required to Scroggs Hill Road.

20.4.1.3 *Methods to manage issues*

710. It is proposed to use the following methods to manage identified issues:
 - a. A 'no DCC reticulated wastewater mapped area' to indicate that the Dunedin City Council (DCC) will not provide connection to reticulated wastewater infrastructure for this site and that on-site wastewater disposal is required.
 - b. Application of a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way (refer to Change D for detail of the new development mapped area provisions).

20.4.1.4 Conclusion

711. This site has a number of issues; however, most are manageable. Rezoning would provide additional large lot sites in Brighton, providing choice for Dunedin's residents.

20.4.1.5 Summary of changes proposed

712. The following amendments to the 2GP maps are proposed in relation to these sites:
- a. Rezoning from Rural Residential 1 to Large Lot Residential 1.
 - b. Application of a 'no DCC reticulated wastewater mapped area'.
 - c. Application of a 'new development mapped area'.

20.4.2 201, 207 & 211 Gladstone Road South, East Taieri (GF02)

713. This site is 3ha block of farmland located on the western edge of East Taieri. See Appendix 6.2 for the site assessment summary.

20.4.2.1 Benefits

714. This site scored well across several criteria, in particular it is a flat, sunny site, and will allow development of a reasonable number (36) of General Residential 1 Zone sites.

20.4.2.2 Costs

715. The site is relatively distant from Mosgiel centre and public transport (2km away). There are potentially significant issues in terms of effects on the wider transport network through cumulative development in Mosgiel. These may require intersection upgrades, including to State Highway 1 (SH1) intersections. There are 3 waters issues that can be managed, through attenuation of stormwater and programmed upgrades.

20.4.2.3 Methods to manage issues

716. It is proposed to use the following methods to manage identified issues:
- a. Application of a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way (refer to Change D for detail of the new development mapped area provisions).

20.4.2.4 Conclusion

717. While issues were identified in relation to some policy criteria, all these issues are manageable. Development at General Residential 1 Zone density is possible, and this is the preferred zoning. Overall, it is considered that the benefits of rezoning this site outweigh the potential costs.

20.4.2.5 Summary of changes proposed

718. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from Taieri Plain - Rural to General Residential 1.

- b. Application of a 'new development mapped area'.

20.4.3 16 Hare Road, Ocean View (GF03)

719. The site is a 3.5ha site on the edge of Brighton. See Appendix 6.3 for the site assessment summary.

20.4.3.1 Benefits

720. This site scored well across most of the criteria, in particular it is a flat, sunny site on the edge of Brighton, with a reasonable feasible capacity (38 dwellings).

20.4.3.2 Costs

721. There are significant, but manageable, issues in terms of effects on the wider transport network.
722. There are some 3 waters issues, but these are manageable, with stormwater attenuation required. Wastewater network upgrades are required but are planned and budgeted for. Some transport upgrades may be required and two accesses to the site would be necessary to obtain the full yield.

20.4.3.3 Methods to manage issues

723. It is proposed to use the following methods to manage identified issues:
- a. Application of a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way (refer to Change D for detail of the new development mapped area provisions).

20.4.3.4 Conclusion

724. While some issues were identified in relation to some policy criteria, all these issues are manageable. Overall, the site is suitable for rezoning to residential. Development at Township and Settlement Zone density is possible, and this is the preferred zoning.

20.4.3.5 Summary of changes proposed

725. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from Rural Residential 1 to Township and Settlement.
 - b. Application of a 'new development mapped area'.

20.4.4 127a Main Road, Fairfield (GF04)

726. This area is part of a split zoned site (part General Residential 1, part rural) in Fairfield. The southern rural zoned part of the site is the area being proposed for rezoning. The site adjoins the Southern Motorway (SH1). See Appendix 6.4 for the site assessment summary.

20.4.4.1 Benefits

727. This site is within Fairfield, adjoining Fairfield School and close to a high frequency bus stop.

20.4.4.2 Costs

728. The site is small and slopes steeply to the south, has a medium level hazard associated with the steeper parts of the site, and adjoins the motorway, meaning that development potential is likely to be limited. The site is estimated to have a feasible capacity of 36 dwellings. Water and wastewater upgrades are required but are budgeted in the draft 10 year plan.
729. The site scored relatively poorly for proximity to a centre compared to other sites being progressed, being 3km from Green Island centre, although there is a dairy and takeaway in Fairfield.

20.4.4.3 Methods to manage issues

730. It is proposed to use the following methods to manage identified issues:
- a. Application of a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way (refer to Change D for detail of the new development mapped area provisions).

20.4.4.4 Conclusion

731. The site will produce a moderate yield and there are no significant costs to rezoning. Rezoning will rectify the current split zoning. Overall, it is considered that the benefits of rezoning this site outweigh the potential costs. Development at General Residential 1 Zone density is possible, and this is the preferred zoning.

20.4.4.5 Summary of changes proposed

732. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from Rural - Hill Slopes to General Residential 1.
 - b. Application of a 'new development mapped area'.

20.4.5 353 Main South Road, Sunnyvale, Fairfield (GF05)

733. This site is a reasonably large area (10 hectares) between Main South Road in Fairfield, and the Grandvista subdivision in Abbotsford. It is on a fairly steep south facing slope, with a flatter plateau at the top, adjoining Grandvista. It is understood that provision was made when developing the Grandvista subdivision for future roading access from Severn Street to the site. See Appendix 6.5 for the site assessment summary.

20.4.5.1 Benefits

734. Despite the constraints identified, the site has a relatively high yield, with an estimated feasible capacity of 49 dwellings.
735. This lower part of the site is close to a high frequency bus stop on Main South Road, and the site is reasonably close to the Green Island centre. It has good access to schools, with two schools within easy walking distance.

20.4.5.2 Costs

- 736. The site is steep in part, and south facing, although there is an elevated flat area to the north adjoining Grandvista. The most easterly part of the site has high landslide hazard risk. A hazard assessment provided by the landowner indicated a former landslide. It identified part of the site not suitable for residential zoning unless under geotechnical
- 737. direction, and part of the site that may be suitable, subject to thorough geotechnical investigations and implementation of remedial drainage.
- 738. The site adjoins a scheduled mining activity (Fairfield Sandpit No. 3), so a 200m setback will be required from the western boundary unless resource consent is obtained.
- 739. Development will result in the loss of highly productive land, although given the geotechnical issues the full site will not be rezoned, so losses will be less than originally assessed. In addition, the site is assessed as having low productive value.
- 740. Water and wastewater upgrades are required, but these are budgeted in the draft 10 year plan. Stormwater will require attenuation. There are existing safety issues at the North Taieri Road / Severn Street intersection, which may become more of a concern if traffic accesses the site via Severn Street.
- 741. The site is subject to a 2GP appeal by The Preservation Coalition Trust to rezone the land from Rural Residential to Rural. This appeal will automatically become an appeal on this part of Variation 2 (Schedule 1 clause 16B RMA).

20.4.5.3 Methods to manage issues

- 742. It is proposed to use the following methods to manage identified issues:
 - a. Not rezone the part of the site identified in the hazard's assessment as not suitable for residential zoning.
 - b. Apply a 'structure plan mapped area' to manage natural hazards issues over the part of the site identified as being potentially suitable, subject to thorough geotechnical investigations and implementation of remedial drainage. Provisions that apply to this structure plan mapped area are being included in the 2GP in new section 15.8.Y (Sunnyvale Structure Plan Mapped Area Performance Standards) and new assessment rule 15.12.3.X. A consequential amendment is also proposed to assessment rule 11.6.2.1.i.
 - c. Apply a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way (refer to Change D for detail of the new development mapped area provisions).

20.4.5.4 Conclusion

- 743. Overall, despite the constraints with slope and hazards issues, the flatter part of the site to the north-west, is considered good for development. There are outstanding issues around development within 200m of the scheduled mining activity, which may further reduce yield, and the appeal to return the land to rural.

744. Overall, noting that only parts may be developable, it is considered that the benefits of rezoning this site outweigh the potential costs.

20.4.5.5 Summary of changes proposed

745. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from Rural Residential 2 to General Residential 1.
 - b. Application of a 'new development mapped area'.
 - c. Application of a 'structure plan mapped area' to manage natural hazards.
 - d. As a consequential change, the 'high class soils mapped area' is removed from the site, as rules relating to this mapped area only apply in rural and rural residential zones.

746. The following amendments to the 2GP are proposed in relation to this site:

747. Add a new section 15.8.Y (Sunnyvale Structure Plan Mapped Area Performance Standards) and new assessment rule 15.12.3.X. A consequential amendment is also proposed to assessment rule 11.6.2.1.i.

20.4.6 Weir Street, Green Island (GF06)

748. This 5.8ha site, comprising 27 Weir Street and part of 1 Allen Road, Green Island) is on farmland to the west of Green Island, between Brighton Road and the Elwyn Crescent area. See Appendix 6.6 for the site assessment summary.

20.4.6.1 Benefits

749. The site is close to Green Island centre and its services and schools, and close to a bus route. It is gently sloping with a north-west aspect and is estimated to provide a reasonable yield (32 houses).

20.4.6.2 Costs

750. A small proportion of the site has high class soils. Loss of the productive potential on this small area of land is likely to be outweighed by the benefits of providing additional housing close to Green Island principal centre. There are some potential flooding issues on part of the site, and geotechnical assessment will be required in regards to potential instability; however, these are not considered significant constraints.
751. More detailed consideration of wastewater management would be required at the time of subdivision; however only minimal (budgeted) network upgrades are required. Stormwater attenuation would be required. There are also significant, but manageable, local transport issues and local roading upgrades would be required.
752. The Ministry for Education (MoE) has raised concerns that as a result of rezoning in the area there is a risk that demand could exceed the current capacity of Green Island School if all proposed dwelling capacity was developed.

20.4.6.3 *Methods to manage issues*

753. It is proposed to use the following methods to manage identified issues:
- a. Application of a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes. and achieves the strategic objectives of the Plan in an integrated way (refer to Change D for detail of the new development mapped area provisions).

20.4.6.4 *Conclusion*

754. Given the location close of Green Island centre and the relative lack of issues, it is considered that the benefits of rezoning this site outweigh the potential costs. Overall, the site is suitable for rezoning to residential. Development at General Residential 1 Zone density is possible, and this is the preferred zoning.

20.4.6.5 *Summary of changes proposed*

755. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from Rural Coastal to General Residential 1.
 - b. Application of a 'new development mapped area'.
 - c. As a consequential change, the 'high class soils mapped area' is removed from the site, as rules relating to this mapped area only apply in rural and rural residential zones.

20.4.7 **33 Emerson Street, Concord (GF07)**

756. This is a 5.8ha site is to the south of Concord, adjacent to residential zoned land. It is elevated above (to the west of) Emerson Street. See Appendix 6.7 for the site assessment summary.

20.4.7.1 *Benefits*

757. This site is elevated and slopes to the north, providing a sunny site. It has a reasonable estimated feasible capacity of 28 dwellings. It is relatively close to a high frequency bus stop, school and the commercial services in Concord.

20.4.7.2 *Costs*

758. The site is moderately steep, which will reduce overall yield and may make construction of the access road difficult. Water supply and wastewater network upgrades are required; however, these are proposed to be included in the 10 year plan. Stormwater attenuation will be required.
759. This site is assessed as having a medium level hazard associated with slope instability. Geotechnical investigations will be required prior to development.

20.4.7.3 *Methods to manage issues*

760. It is proposed to use the following methods to manage identified issues:

- a. Application of a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way (refer to Change D for detail of the new development mapped area provisions).

20.4.7.4 Conclusion

761. Overall, given the proximity to Concord services and public transport and the relative lack of issues, it is considered that the benefits of rezoning this site outweigh the potential costs. Development at General Residential 1 Zone density is possible, and this is the preferred zoning.

20.4.7.5 Summary of changes proposed

762. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from Rural to General Residential 1.
 - b. Application of a 'new development mapped area'.

20.4.8 19 Main South Road, Concord (GF08)

763. This site is located between Concord and the Southern Motorway (SH1) is the site of the Dunedin City Baptist Church. It is proposed to be rezoned General Residential 1 and General Residential 2 in part. See Appendix 6.8 for the site assessment summary.

20.4.8.1 Benefits

764. The site is very close to the Concord commercial area, primary school and a high frequency bus stop, making it particularly suitable for General Residential 2 zoning where the slope allows higher density development. It has a reasonable estimated feasible capacity of 32 dwellings.
765. The southern part of the area contains a small stream, and has been planted up, providing good amenity for residents.

20.4.8.2 Costs

766. The site is moderately sloped in part, towards the south, but is elevated above Concord, which will reduce shading issues. Acoustic insulation will be required for houses close to the motorway, but this should not prevent development.
767. Water supply and wastewater network upgrades are required, but these are budgeted in the draft 10 year plan. Stormwater attenuation would be required. Roading access will require careful consideration at the time of subdivision.

20.4.8.3 Methods to manage issues

768. It is proposed to use the following methods to manage identified issues:
- a. Apply a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the

strategic objectives of the Plan in an integrated way (refer to Change D for detail of the new development mapped area provisions).

- b. Application of a 'structure plan mapped area' to manage indigenous vegetation clearance. Provisions that apply to this structure plan mapped area are being included in the 2GP in new section 15.8.AB (Main South Road Concord Structure Plan Mapped Area Performance Standards).

20.4.8.4 Conclusion

769. Given the proximity of the site Concord's services and public transport and lack of issues, the site is suitable for rezoning, including for General Residential 2 zoning, where the slope allows a higher density of development. Overall, it is considered that the benefits of rezoning this site outweigh the potential costs.

20.4.8.5 Summary of changes proposed

770. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from Hill Slopes - Rural to part General Residential 1 and part General Residential 2.
 - b. Application of a 'new development mapped area'.
 - c. Application of a 'structure plan mapped area'.
771. The following amendments to the 2GP are proposed in relation to this site:
- a. Add a new section 15.8.AB (Main South Road Concord Structure Plan Mapped Area Performance Standards).

20.4.9 41-49 Three Mile Hill Road, Halfway Bush (GF09)

772. This area comprises a small group of existing developed sites on Three Mile Hill Road near Dalziel Road. The sites are zoned Rural Residential 1, but are approximately 2,000m² in area. It is proposed to amend the zoning to Large Lot Residential 1, to reflect their size and the existing development. The sites are already developed, and the rezoning will not provide any additional development potential.

20.4.9.1 Benefits

773. The rezoning will mean that residential performance standards apply, reducing the need for resource consent for matters such as development close to boundaries are reduced (the rural residential rules require a significantly greater setback from boundaries than in the residential zones).

20.4.9.2 Costs

774. There are no identified costs. The sites are outside the area serviced by DCC for water and wastewater (they are currently self-serviced) and this situation will continue.

20.4.9.3 *Methods to manage issues*

775. It is proposed to use the following methods to manage identified issues:
- a. Application of a 'no DCC reticulated wastewater mapped area' to indicate that the Dunedin City Council will not provide connection to reticulated wastewater infrastructure for this site and that on-site wastewater disposal is required.

20.4.9.4 *Conclusion*

776. Given the existing development, the benefits of rezoning this site to residential outweigh the costs. Policy 2.2.4.1 requires that land is used efficiently and zoned at a standard or medium density, unless site constraints make this inappropriate. In this case, the zoning acknowledges the existing development pattern; higher density development would not be appropriate at this location, due to the inability to connect it to reticulated services.

20.4.9.5 *Summary of changes proposed*

777. The following amendments to the 2GP maps are proposed in relation to these sites:
- a. Rezoning from Rural Residential 1 to Large Lot Residential 1.
 - b. A 'no DCC reticulated wastewater mapped area' will be applied to advise that servicing for wastewater is not possible.

20.4.10 *Honeystone Street, Helensburgh (GF10)*

778. This is a 9ha area adjoining existing residential development, close to Wakari Road. It was the subject of a submission to rezone it to Rural Residential 2 at the 2GP hearing process. This was rejected partly on the basis of a poor alignment with Policy 2.6.1.5, which outlines the criteria for rezoning sites to rural residential, and partly because the panel felt that the Wakari Road area may have attributes that could support future rezoning to General Residential 1 density. Rural residential zoning might prevent future residential development.
779. The area adjoins the Flagstaff - Mount Cargill Significant Natural Landscape overlay (SNL) area to the north. None of the land covered by the SNL has been assessed for rezoning and is not within the scope of this proposal. The site includes a small creek, with riparian planting along it.
780. The proposal is for rezoning to Large Lot Residential 1.
781. See Appendix 6.9 for the site assessment summary.

20.4.10.1 *Benefits*

782. The site is close to a high frequency bus stop, Helensburgh neighbourhood centre and Wakari School. It has a reasonable estimated feasible capacity of 29 dwellings.

20.4.10.2 *Costs*

783. There is an area with indigenous vegetation values on the site, and riparian vegetation along the creek, which has values as a riparian buffer. Indigenous vegetation clearance rules that apply in rural residential zones do not apply in residential zones. It is therefore proposed to

protect these areas of vegetation through a structure plan rule, which will provide amenity benefits to residents, as well as ecological benefits.

784. Part of the site has a medium level hazard associated with slope instability within the wider area. Geotechnical assessment will be required prior to development. Water and wastewater network upgrades are required, but these are budgeted in the draft 10 year plan. Stormwater attenuation would be required. Roading access will require careful consideration as the code of subdivision limits the number of sites that can be accessed from a cul-de-sac to 20. Some local roading intersection upgrades may be required.
785. It is noted that there was some local opposition to rezoning this area rural residential at the time of the 2GP hearing, in relation to loss of rural land and rural amenity. The site is not easily viewed from nearby streets due to the nature of the topography, existing vegetation and the existing residential properties. There will be a loss of rural outlook for neighbouring properties, but minor effects on a broader scale.
786. In relation to loss of rural land, approximately half the site is mapped as having high class soils, but the site does not contain any LUC Class 1 to 3 land. The loss of primary productivity potential is relatively low.

20.4.10.3 *Methods to manage issues*

787. It is proposed to use the following methods to manage identified issues:
- a. Apply a 'new development mapped area'.
 - b. Application of a structure plan mapped area rule to manage indigenous vegetation clearance in the identified areas of vegetation.

20.4.10.4 *Conclusion*

788. The site will provide additional large lot development potential. Policy 2.2.4.1 requires that land is used efficiently and zoned at a standard or medium density, unless site constraints make this inappropriate. In this case, the presence of the stream, bush areas, a gully and areas of steep slope mean that General Residential 1 density is not possible over part of the site. However, part may be developable at General Residential 1 density (further advice from the landowner is required), and this remains within the scope of Variation 2.
789. Overall, it is considered that that the benefits of rezoning this site residential outweigh the potential costs.

20.4.10.5 *Summary of changes proposed*

790. The following amendments to the 2GP maps are proposed in relation to these sites:
- a. Rezoning from Rural Hill Slopes to Large Lot Residential 1.
 - b. Application of a 'new development mapped area'.
 - c. Application of a 'structure plan mapped area' to manage indigenous vegetation clearance.

- d. As a consequential change, the 'high class soils mapped area' is removed from the site, as rules relating to this mapped area only apply in rural and rural residential zones.

791. The following amendments to the 2GP are proposed in relation to these sites:

- a. Add a new section 15.8.AA (Honeystone Street Structure Plan Mapped Area Performance Standards).

20.4.11 Polwarth Road and Wakari Road, Helensburgh (GF11)

792. This is a large (22ha) area along Wakari Road towards Ross Creek reserve. It surrounds the current Residential Transition Overlay Zone area on the north side of Wakari Road and extends up to the Flagstaff – Mount Cargill significant natural landscape overlay zone and across to the south side of Wakari Road, adjoining existing residential zoned land. It is proposed to release the existing Residential Transition Overlay Zone for residential use, providing a large area for comprehensive development. See Appendix 6.10 for the site assessment summary.

20.4.11.1 Benefits

793. The area is generally gently sloping and provides an extension of the existing residential area. The western part of the site is within 500m of a high frequency bus stop, and the site is reasonably close to Helensburgh neighbourhood centre and Wakari School. There is relatively easy access to the CBD down Taieri Road. The site has significant development potential (240 dwellings).

20.4.11.2 Costs

- 794. Development of this area will reduce local rural character and amenity values from what is currently experienced, by adding a significant area of residential development. However, the loss of rural amenity needs to be considered taking into account the baseline of the existing Residential Transition Overlay Zone extending along Wakari Road, which, once developed, will change the character along Wakari Road.
- 795. There are some mapped high class soils in the area, but no LUC Class 1 – 3 (highly productive) land. Most of the area is already developed to a rural residential scale, limiting the potential for primary productivity.
- 796. Part of the site has a medium level hazard associated with slope instability within the wider area. Geotechnical assessment will be required prior to development. Water and wastewater network upgrades are required, but these are budgeted in the draft 10 year plan. Stormwater attenuation would be required and it is noted that this may be at some cost to the developer, as the catchment discharges into Leith Stream.
- 797. A local area traffic management study, and local roading and intersection upgrades, will be required.
- 798. The site is subject to a 2GP appeal by The Preservation Coalition Trust to rezone the land from Rural Residential to Rural. This appeal will automatically become an appeal on this part of Variation 2 (Schedule 1 clause 16B RMA).

20.4.11.3 *Methods to manage issues*

799. It is proposed to use the following methods to manage identified issues:
- a. Apply a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way (refer to Change D for detail of the new development mapped area provisions).

20.4.11.4 *Conclusion*

800. Rezoning this area will result in a loss of local rural amenity and character from the but this must be considered against the significant development potential of the area, and the existing Residential Transition Overlay Zone, which allows residential development once infrastructure constraints are resolved. The size of the development may also mean more significant traffic upgrades that needed for other sites.
801. The owner of 265 Wakari Road is not supportive of the rezoning and has no aspirations to develop this site. The site is included within the proposed rezoning to prevent an isolated pocket of rural residential zoned land.
802. Overall, it is considered that the benefits of rezoning a large area of development in reasonably close proximity to the town centre, outweigh the costs.

20.4.11.5 *Summary of changes proposed*

803. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from Rural Residential 2 to General Residential 1.
 - b. Application of a 'new development mapped area'.
 - c. As a consequential change, the 'high class soils mapped area' is removed from the site, as rules relating to this mapped area only apply in rural and rural residential zones.

20.4.12 *233 Signal Hill Road, Upper Junction (GF12)*

804. This site is the northernmost part of 233 Signal Hill Road, outside the significant natural landscape overlay zone, located at the end of Birchfield Avenue and Pleasant Place. The part of the site within the significant natural landscape overlay zone has not been assessed for rezoning and is not part of the scope of the zoning proposal. However, it is within scope in relation to the application of an Area of Significant Biodiversity Value (ASBV) to part of the site. See Appendix 6.11 for the site assessment summary.

20.4.12.1 *Benefits*

805. The site slopes to the north, and is elevated above North-East Valley, providing a sunny site. It is close to a high frequency bus route. The site has an estimated feasible capacity of 6 dwellings.

20.4.12.2 Costs

- 806. The site generally slopes steeply, which is likely to affect the development potential.
- 807. It is distant (4 km) from a commercial centre; however, there is a high frequency bus route and cycle lanes along North Road.
- 808. Part of the site contains native bush that meets the ASBV criteria. This is currently covenanted. It is proposed to include this area in the 2GP as an ASBV. The covenanted area will not be rezoned residential.
- 809. Part of the site has a medium hazard level associated with slope instability and stormwater management. Geotechnical investigations will be required prior to development.
- 810. The site cannot be serviced for wastewater due to constraints in the North-East Valley network. Self-servicing is therefore required, necessitating a large lot residential zoning, rather than General Residential 1. Servicing for potable water is theoretically possible, however is not desirable, due to the risk of overloading the wastewater disposal system. Large lot zoning is required in order to allow for self-servicing for both these waters. Stormwater attenuation will be required.
- 811. DCC's transport department has identified that there is no apparent satisfactory means of accessing this site from North Road. There are potential problems should Pleasant Place be proposed as the access route, due to the restricted nature of the road. Access will need to be carefully assessed, with consideration given to the number of lots that could access the site for any point.

20.4.12.3 Methods to manage issues

- 812. It is proposed to use the following methods to manage identified issues:
 - a. Zone to Large Lot Residential 1 Zone, to allow self-servicing for wastewater and water supply.
 - b. Apply a 'no DCC reticulated wastewater mapped area' to indicate that the Dunedin City Council will not provide connection to reticulated wastewater infrastructure for this site and that on-site wastewater disposal is required.
 - c. Application of an 'Area of Significant Biodiversity Value' to part of this site to manage ecological values.
 - d. Apply a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way (refer to Change D for detail of the new development mapped area provisions).

20.4.12.4 Conclusion

- 813. The site will provide a small number of large lot residential sites, giving additional choice to Dunedin's residents. While there are a number of issues that would need to be addressed at time of subdivision, there is the potential for development of the site.

20.4.12.5 Summary of changes proposed

814. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from Rural to Large Lot Residential 1.
 - b. Application of a 'new development mapped area'.
 - c. Application of a 'no DCC reticulated wastewater mapped area'.
 - d. Apply an 'Area of Significant Biodiversity Value' to part of the site already protected by a covenant, to manage ecological values.
 - e. As a consequential change, the 'high class soils mapped area' is removed from the site, as rules relating to this mapped area only apply in rural and rural residential zones.
815. The following amendments to the 2GP are proposed in relation to these sites:
- a. Addition of new row (C166) to Schedule A1.2 (Schedule of Areas of Significant Biodiversity Value) to describe the new ASBV site and its values.

20.4.13 336 & 336A Portobello Road, The Cove (GF14)

816. This site is located along Portobello Road, approximately 600m east of The Cove. It is a small site, having an estimated feasible capacity of 5 dwellings. The area assessed does not include the part of 336 or 336A Portobello Road subject to a significant natural landscape overlay zone. See Appendix 6.12 for site assessment summary.

20.4.13.1 Benefits

817. The site slopes to the north, providing a sunny site. It is very close to a bus stop, on Portobello Road.

20.4.13.2 Costs

818. The site is distant (4 km) from a commercial centre; however, there is a bus route adjacent to the site.
819. Part of the site has a medium level hazard associated with slope instability, particularly on steeper parts. Geotechnical assessment will be required prior to development.
820. Upgrades are required to the water supply network; however, based on the proposed total additional capacity of approximately 100 dwellings on the Peninsula (through Variation 2 and 2GP appeals), the impact on the water supply network is considered to be minimal and acceptable. Stormwater culverts would likely need to be upgraded for capacity and erosion protection for the overland flow path.
821. The road network adjacent to the harbour, from the intersection of Marne Street / Portobello Road to approximately Strathallan Street is under performing during the morning and afternoon peak hours. While this site will contribute only a small increase in traffic, any

additional development in the Otago Peninsula area will exacerbate this situation. A wider and local area traffic management study, and roading and intersection upgrades, may be required.

- 822. The site is subject to a 2GP appeal by The Preservation Coalition Trust to rezone the land from Rural Residential to Rural and to extend the significant natural landscape overlay over most of the area. This appeal will automatically become an appeal on this part of Variation 2 (Schedule 1 clause 16B RMA).
- 823. The site is subject to a 2GP appeal by The Coalition Preservation Trust to rezone the land from Rural Residential to Rural. This appeal will automatically become an appeal on Variation 2 (Schedule 1 clause 16B RMA).

20.4.13.3 *Methods to manage issues*

- 824. It is proposed to use the following methods to manage identified issues:
 - a. Apply a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way (refer to Change D for detail of the new development mapped area provisions).

20.4.13.4 *Conclusion*

- 825. The site is small and will provide only a small increase in capacity; however, it adjoins an existing residential area and the owners are keen to develop. There are some issues with the site, but these appear to be manageable. Overall, residential zoning appears to be appropriate.

20.4.13.5 *Summary of changes proposed*

- 826. The following amendments to the 2GP maps are proposed in relation to this site:
 - a. Rezoning from Rural Residential 2 to Township and Settlement.
 - b. Application of a 'new development mapped area'.

20.4.14 *Area west of Highcliff Road, Portobello (GF15 and GF17)*

- 827. These sites are located on the western side of Highcliff Road as it approaches Portobello township, and comprise 23 and 25 McAuley Road, 1693, 1687, 1683 and 1661 Highcliff Road (GF15) and 26 McAuley Road (GF17). See Appendix 6.13 for site assessment summary. The site has an undulating topography, steep in parts, and including a gully, which would affect development capacity. Consequently, it has been assessed for potential Large lot Residential 1 zoning, rather than Township and Settlement. 26 McAuley Road has been developed with a number of ponds and associated native plantings, and the owner does not support residential development of the site. It is understood that the owner allows public access to the area for passive recreation.

20.4.14.1 Benefits

828. The site adjoins Portobello township and so is very close to a primary school, neighbourhood centre and a bus route into Dunedin. It generally has a north-west aspect.

20.4.14.2 Costs

829. Part of the site has a medium level hazard associated with slope instability associated with slope instability, particularly on steeper parts of the site. Geotechnical assessment will be required prior to development.
830. Upgrades are required to the water supply network; however, based on the proposed total additional capacity of approximately 100 dwellings on the Peninsula (through Variation 2 and 2GP appeals), the impact on the water supply network is considered to be minimal and acceptable. Upgrades to the wastewater network may be required and are budgeted in the draft 10 year plan. Despite these constraints, DCC's 3 Waters department considers the site, although Large Lot Residential, can be serviced for water and wastewater.
831. Stormwater attenuation will be required.
832. The road network adjacent to the harbour, from the intersection of Marne Street / Portobello Road to approximately Strathallan Street is under performing during the morning and afternoon peak hours. Additional development in the Otago Peninsula area will exacerbate this situation. A wider and local area traffic management study, and roading and intersection upgrades, may be required.
833. The site was inspected by DCC's Biodiversity Advisor, who considered 26 McAuley Road to have good biodiversity values due the native plantings and habitat created for indigenous biodiversity.
834. Development of the area will result in a change in rural character on the approach into Portobello from Highcliff Road. While there will be local impacts, mitigated by the low density scale of development, effects will be minor on a broader scale.
835. The site is subject to a 2GP appeal by The Preservation Coalition Trust to rezone the land from Rural Residential to Rural and extend the significant natural landscape overlay over the area. This appeal will automatically become an appeal on this part of Variation 2 (Schedule 1 clause 16B RMA).
836. The site is subject to a 2GP appeal by The Coalition Preservation Trust to rezone the land from Rural Residential to Rural. This appeal will automatically become an appeal on Variation 2 (Schedule 1 clause 16B RMA).

20.4.14.3 Methods to manage issues

837. It is proposed to use the following methods to manage identified issues:
- a. Apply a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way (refer to Change D for detail of the new development mapped area provisions).

- b. Apply Recreation zoning to 26 McAuley Road, rather than Large Lot Residential 1, to reflect its current use, biodiversity values and amenity benefits to the local neighbourhood. This would limit what could be done on the site; however, discussions with the landowner indicate they are supportive of this zoning.
- c. Application of a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way (refer to Change D for detail of the new development mapped area provisions).

20.4.14.4 Conclusion

- 838. Rezoning most of the area to residential site will provide additional large lot sized sites close to Portobello township, providing choice to Dunedin's residents. It is considered that the issues associated with developing the site are not significant, and that the benefits of residential zoning outweigh the costs.
- 839. It is noted that the owner of 23 and 25 McAuley Road is not supportive of rezoning and has no aspirations to develop these sites. The site is included in the rezoning area to prevent an isolated pocket of rural residential zoned land.

20.4.14.5 Summary of changes proposed

- 840. The following amendments to the 2GP maps are proposed in relation to this site:
 - a. Rezoning of 23 and 25 McAuley Road, 1693, 1687, 1683 and 1661 Highcliff Road, from Rural Residential 2 to Large Lot Residential 1 (GF15).
 - b. Application of a 'new development mapped area' over 23 and 25 McAuley Road, 1693, 1687, 1683 and 1661 Highcliff Road (GF15).
 - c. Rezoning 26 McAuley Road from Rural Residential 2 to Recreation Zone (GF17).

20.4.15 Area east of Highcliff Road, Portobello (GF16)

- 841. The site is located on the eastern side of Highcliff Road as it approaches Portobello township, and comprises 1694, 1680 Highcliff Road, 1664 Highcliff Road (in part), 27 Hereweka Street, Portobello. It includes the Portobello campground on Hereweka Street. See Appendix 6.13 for site assessment summary.

20.4.15.1 Benefits

- 842. The site adjoins Portobello township and so is very close to a primary school, neighbourhood centre and a bus route into Dunedin. It generally has a northerly or north-easterly aspect. The part of the area west of Hereweka Street is elevated with views over the harbour.

20.4.15.2 Costs

- 843. Part of the area has a medium level hazard associated with slope instability within the wider area. Geotechnical assessment will be required prior to development.

- 844. Development of the area will result in a change in rural character on the approach into Portobello from Highcliff Road. While there will be local impacts, effects will be minor on a broader scale.
- 845. Upgrades are required to the water supply network; however, based on the proposed total additional capacity of approximately 100 dwellings on the Peninsula (through Variation 2 and 2GP appeals), the impact on the water supply network is considered to be minimal and acceptable. Upgrades to the wastewater network may be required and are budgeted in the draft 10 year plan. Stormwater attenuation will be required.
- 846. The road network adjacent to the harbour, from the intersection of Marne Street / Portobello Road to approximately Strathallan Street is under performing during the morning and afternoon peak hours. Additional development in the Otago Peninsula area will exacerbate this situation. A wider and local area traffic management study, and roading and intersection upgrades, may be required.
- 847. The site is subject to a 2GP appeal by The Preservation Coalition Trust to rezone the land from Rural Residential to Rural and extend the significant natural landscape overlay over the area. This appeal will automatically become an appeal on this part of Variation 2 (Schedule 1 clause 16B RMA).

20.4.15.3 *Methods to manage issues*

- 848. It is proposed to use the following methods to manage identified issues:
 - a. Apply a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way (refer to Change D for detail of the new development mapped area provisions).

20.4.15.4 *Conclusion*

- 849. It is considered that the issues associated with developing the site are not significant, and that the benefits of residential zoning outweigh the costs.

20.4.15.5 *Summary of changes proposed*

- 850. The following amendments to the 2GP maps are proposed in relation to this site:
 - a. Rezoning from Rural Residential 2 Zone to Township and Settlement.
 - b. Application of a 'new development mapped area'.
 - c. As a consequential change, the 'high class soils mapped area' is removed from the site, as rules relating to this mapped area only apply in rural and rural residential zones.

20.4.16 *Mosgiel Medium Density Extension 1 (IN01)*

- 851. This area comprises 26ha of existing developed residential area in Mosgiel, to the east of Gordon Road between Factory Road and immediately south of Doon Street. The area assessed adjoins Taieri College and Silverstream Primary School. The sites are zoned General

Residential 1 and have been assessed for rezoning to General Residential 2. It is estimated that rezoning will provide additional feasible development potential for approximately 348 dwellings.

852. Note that, while the two schools were not assessed for rezoning to residential, their default zoning (the zoning that will apply if land is surplus to the requirements of the school) is within the scope of Variation 2.

853. See Appendix 6.14 for site assessment summary.

20.4.16.1 Benefits

854. The area is very close of Mosgiel Principal Centre and adjoins a primary school and high school. There is a high frequency bus route on Gordon Road.

855. This site has is flat and so has good solar access.

856. The area has a high estimated feasible capacity of 348 dwellings, it a significant contributor to residential capacity. The area has a mixed character and has been assessed as capable of absorbing further intensification without a detrimental effect on its broader residential neighbourhood character

20.4.16.2 Costs

857. Mosgiel's water supply is currently strained during dry hot summer periods and this would be exacerbated by further development. These issues are expected to be resolved within 3-5 years, meaning there are unlikely to be significant effects on water supply.

858. Wastewater network upgrades are required; however, these are proposed to be included in the 10 year plan. There are existing flooding issues in the area and stormwater attenuation will be required. In addition, to further manage this issue, it is proposed to maintain the maximum impermeable surface limits at the General Residential 1 limit.

859. The roading infrastructure within the area are outdated and do not meet current standards. Intensification is likely to require isolated intersection and footpath upgrades, to manage speeds and improve access for pedestrians, particularly to schools, shops and local recreation. In addition, cumulative development in Mosgiel is likely to put extra pressure on the state highway network, in particular the Gordon Road / State Highway 1 intersection, which has existing efficiency issues. Upgrade of this and other intersections may be required. At present, no infrastructure upgrades have been regionally prioritised and are therefore neither planned nor funded by DCC or NZTA.

20.4.16.3 Methods to manage issues

860. It is proposed to use the following methods to manage identified issues:

- a. Apply a 'stormwater constraint mapped area' to keep the maximum permitted area of impermeable surfaces at the same area as for the General Residential 1 zone as there are known stormwater constraints in this area (refer Change F2-7).
- b. Apply the 'Mosgiel mapped area', which applies to other nearby General Residential 2 zoned areas. This sets slightly smaller setback requirements for

buildings from boundaries than apply in some other General Residential 2 areas, to reflect the existing development pattern in this part of Mosgiel.

20.4.16.4 Conclusion

- 861. The area will provide a significant number of General Residential 2 Zone sites, adding capacity in an area that has in recent years been a focus of development. This can be achieved without significant effects on residential character. 3 waters infrastructure upgrades are planned to service the additional sites.
- 862. The primary cost relates to impacts on the roading network, particularly the State Highway intersections. Upgrades of the Gordon Road intersection may be required and this is not funded. Overall, it is considered that the benefits to providing additional medium density capacity in this location outweigh this cost.
- 863. As a consequential change, it is also proposed to amend the default zone for Taieri College and Silverstream School from General Residential 1 to General Residential 2, to reflect the zoning of the areas around them.

20.4.16.5 Summary of changes proposed

- 864. The following amendments to the 2GP maps are proposed in relation to this site:
 - a. Rezoning General Residential 1 sites to General Residential 2.
 - b. Application of a 'stormwater constraint mapped area'.
 - c. Application of a 'Mosgiel mapped area'.
- 865. The following amendments to the 2GP are proposed in relation to these sites:
 - a. In addition, amend Appendix A9 of the 2GP to change the default zone for Taieri College and Silverstream Primary School from General Residential 1 to General Residential 2.

20.4.17 Burgess Street & surrounds, Green Island (IN02)

- 866. The area assessed is centred on Burgess Street, on the western side of Green Island, adjacent to St Peter Chanel School. The sites are zoned General Residential 1 and have been assessed for rezoning to General Residential 2. It is estimated that rezoning will provide additional feasible development potential for approximately 38 dwellings.
- 867. Note that, while St Peter Chanel School was not assessed for rezoning to residential, its default zoning (the zoning that will apply if land is surplus to the requirements of the school) is within the scope of Variation 2.
- 868. See Appendix 6.15 for site assessment summary.

20.4.17.1 Benefits

- 869. The site is very close to Green Island Principal Centre, two primary schools and a high frequency bus route. It has good solar access with a gentle slope facing west.

870. The overall character of the area is mixed and capable of absorbing change.
871. Any 3 waters and transport infrastructure upgrades required are likely to be minor in nature.

20.4.17.2 Costs

872. The Ministry for Education (MoE) has raised concerns that there is a risk that demand could exceed the current capacity of Green Island School if all proposed dwelling capacity was developed.

20.4.17.3 Methods to manage issues

873. None proposed.

20.4.17.4 Conclusion

874. The site has few costs but would provide an estimated feasible capacity of 38 additional residential sites. Its location close to Green Island provides a number of benefits, in terms of services available. Further consideration may need to be given to the capacity of Green Island School to cater for demand; however, there are also schools nearby in Fairfield and Abbotsford, as well as St Peter Chanel School (an integrated school) within Green Island.
875. As a consequential change, it is proposed to amend the default zone for St Peter Chanel School from General Residential 1 to General Residential 2, to reflect the zoning of the adjoining area.

20.4.17.5 Summary of changes proposed

876. The following amendments to the 2GP maps are proposed in relation to this area:
- a. Rezoning from General Residential 1 to General Residential 2.
877. The following amendments to the 2GP are proposed in relation to these sites:
- a. In addition, amend Appendix A9 of the 2GP to change the default zone for St Peter Chanel School from General Residential 1 to General Residential 2.

20.4.18 Green Island (IN03)

878. The area assessed is the area immediately to the south and east of the existing General Residential 2 zoned area in central Green Island, between Howden Street and Edinburgh Street, as far south as District Road. The sites are zoned General Residential 1 and have been assessed for rezoning to General Residential 2. The rezoning will provide additional feasible development potential for approximately 23 dwellings.
879. Note that while the Green Island School site was not assessed for rezoning to residential, the default zoning of the school (the zoning that will apply if land is surplus to the requirements of the school) is within the scope of Variation 2
880. See Appendix 6.16 for site assessment summary.

20.4.18.1 *Benefits*

- 881. The site is very close to Green Island Principal Centre, Green Island School and a bus route. It has good solar access with a gentle slope facing north.
- 882. The site has an approximate feasible capacity of 23 dwellings. The overall character is assessed as mixed and capable of absorbing change. 69% of the area has housing that is pre-1950 or is has a value lower than Dunedin's lower quartile house value, increasing the likelihood of redevelopment.
- 883. No water network upgrades are required, and any wastewater upgrades that may be required would be minor.

20.4.18.2 *Costs*

- 884. There are potential issues from any increase in stormwater run-off on downstream flooding, that may require stormwater attenuation. To manage this issue, it is proposed to maintain the maximum impermeable surface limits at the General Residential 1 limit.
- 885. There is congestion in the evening peak hour at the SH1 southbound off ramp. Additional development would exacerbate this.
- 886. The Ministry for Education (MoE) has raised concerns that there is a risk that demand could exceed the current capacity of Green Island School if all proposed dwelling capacity was developed.

20.4.18.3 *Methods to manage issues*

- 887. It is proposed to use the following methods to manage identified issues:
 - a. Apply a 'stormwater constraint mapped area' to maintain the maximum permitted area of impermeable surfaces at the current General Residential 1 Zone level, to manage the risk of stormwater flooding (refer Change F2-7).

20.4.18.4 *Conclusion*

- 888. The site has few costs and will provide an estimated feasible capacity of 23 additional residential sites. While this is only a moderate increase in capacity, the location has a number of benefits due to its location close to Green Island centre. Further consideration may need to be given to the capacity of Green Island School to cater for demand; however, there are also schools nearby in Fairfield and Abbotsford, as well as St Peter Chanel School (an integrated school) within Green Island. Overall, it is considered that the benefits of zoning this area outweigh the costs.
- 889. As a consequential change, it is proposed to amend the default zone for Green Island School from General Residential 1 to General Residential 2, to reflect the zoning of the adjoining area.

20.4.18.5 *Summary of changes proposed*

- 890. The following amendments to the 2GP maps are proposed in relation to these sites:
 - a. Rezoning from General Residential 1 to General Residential 2.

b. Application of a 'stormwater constraint mapped area'

891. The following amendments to the 2GP are proposed in relation to these sites:

- a. In addition, amend Appendix A9 of the 2GP to change the default zone for Green Island School from General Residential 1 to General Residential 2.

20.4.19 Concord (IN04)

892. The area proposed for rezoning is centred on Mulford Street, stretching from Blackhead Road /Middleton Road to Orr Street. The sites are zoned General Residential 1 and have been assessed for rezoning to General Residential 2. The rezoning will provide additional development potential for approximately 31 dwellings.

893. See Appendix 6.17 for site assessment summary.

20.4.19.1 Benefits

894. The site is close to Concord School and has access to public transport along Middleton Road and at the northern end of Mulford Street. The southern (upper) part of the site is relatively close to Corstorphine centre and the northern (lower) part to the commercial area at Concord. There are currently no General Residential 2 areas close by, so this provides potential for some medium density development within the Concord / Corstorphine area.

895. The area generally slopes to the north-east and has good solar access.

896. No transport upgrades are required.

20.4.19.2 Costs

897. Moderate water supply and wastewater network upgrades are required; however, these are proposed to be included in the 10 year plan. Stormwater attenuation may be required to prevent negative impacts on downstream properties and ensure no increase in flood hazard in Kaikorai Stream. To further manage this issue, it is proposed to maintain the maximum impermeable surface limits at the General Residential 1 limit.

898. The area has a strong built character and there is limited capability to absorb intensification of development without a detrimental effect on this character. Design guidelines are recommended to mitigate the potential effects of intensification.

20.4.19.3 Methods to manage issues

899. It is proposed to use the following methods to manage identified issues:

- a. Apply a 'stormwater constraint mapped area' to maintain the maximum permitted area of impermeable surfaces at the current General Residential 1 Zone level, to manage the risk of stormwater flooding (refer Change F2-7).

20.4.19.4 Conclusion

900. Zoning the area will provide potential for medium density development in part of the city where this is currently not possible. There are relatively few costs; the most significant of which is that intensification is likely to result in the existing built character. While this will be a change, it may not necessarily result in a decrease in residential amenity. Zoning has the potential to provide an estimated 31 feasible new dwellings. It is considered that the benefits of rezoning outweigh the costs, and that rezoning is appropriate.

20.4.19.5 Summary of changes proposed

901. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from General Residential 1 to General Residential 2.
 - b. Application of a 'stormwater constraint mapped area'

20.4.20 Mornington (north) (IN05)

902. The area proposed for rezoning adjoins existing General Residential 2 zoned areas at Mornington and Belleknowes. It extends north from Mornington School (Durham Street) across Hawthorn Avenue and joins the Town Belt, as far as Alison Avenue. An additional area extending across Rosebery Street was assessed (see map in Appendix 6.18); however, this is not proposed for rezoning due to concerns about the impacts on the residential character (see Appendix 9). This area is within the scope of Variation 2.
903. The sites are zoned General Residential 1 and have been assessed for rezoning to General Residential 2. It is estimated that the rezoning will provide additional development potential for approximately 25 dwellings.
904. Note that while the Mornington School site was not assessed for rezoning to residential, the default zoning of the school (the zoning that will apply if land is surplus to the requirements of the school) is within the scope of Variation 2.
905. See Appendix 6.18 for site assessment summary.

20.4.20.1 Benefits

906. The area connects town existing General Residential 2 areas, and is very close to Mornington Suburban Centre, Mornington School and a high frequency bus route. The area is elevated, generally sloping to the east with views over the harbour. Part of the area, to the west of Kenmure Road, slopes towards the west, overlooking Kaikorai Valley.
907. The character of the area is mixed, with high quality housing and positive streetscape and amenity values. Historic development and subdivision has proved intensification is possible without overly affecting the character, providing there is a reasonable quality of architecture. Design guides are recommended to ensure new housing respects the built form and scale of existing development.
908. The area has good market desirability.

20.4.20.2 Costs

909. Water supply network upgrades are required; however, these are proposed to be included in the 10 year plan. With regards to wastewater, most of the area drains into the central city network. Network upgrades may be required further downstream (the local network has adequate capacity). These are proposed to be included in DCC's Infrastructure Strategy. The area west of Kenmure Road drains to the Kaikorai Valley / South Dunedin wastewater network. There are existing capacity issues and wastewater overflows within this system and to avoid exacerbating these issues, it is proposed to apply a wastewater constraint mapped area to this area. This limits the development potential to one habitable room per 100m² of site area, compared to the normal General Residential 2 limit of one habitable room per 45m² of site area.
910. There are known stormwater issues downstream. Stormwater attenuation would be ideal but may be difficult to achieve. It is therefore proposed that the maximum impermeable surface limits are kept at the General Residential 1 limit.
911. There are a range of existing issues in the local transport network, including safety concerns due to the older layout of intersections with wide radii, and improvements may be required.

20.4.20.3 Methods to manage issues

912. It is proposed to use the following methods to manage identified issues:
913. Application of a 'wastewater constraint mapped area' (formerly an 'infrastructure constraint mapped area' – refer Change F3-3) over the part of the site west of Kenmure Road to limit density and minimum site size in order to manage potential effects on the wastewater public infrastructure network.
914. Apply a 'stormwater constraint mapped area' to maintain the maximum permitted area of impermeable surfaces at the current General Residential 1 Zone level, to manage the risk of stormwater flooding (refer Change F2-7).

20.4.20.4 Conclusion

915. The area connects existing General Residential 2 areas and allows more flexible, medium density development over a broad area of land above the Town Belt, which has traditionally been a desirable area to live. There are a number of infrastructure issues, but these are manageable. Development is possible without significantly reducing the character of the area, providing new housing is designed appropriately. While there is a relatively high percentage of older, and/or lower value housing, suggesting redevelopment is more likely, the additional feasible capacity is estimated at a modest 25. Nonetheless, providing for medium density housing over a fairly broad area will allow development to occur where landowners consider it appropriate. Overall, it is considered that the benefits of rezoning outweigh the costs.
916. As a consequential change, it is also proposed to amend the default zone for Mornington School from General Residential 1 to General Residential 2, to reflect the zoning of the area around it.

20.4.20.5 Summary of changes proposed

917. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from General Residential 1 to General Residential 2.
 - b. Application of a 'wastewater constraint mapped area' (formerly an 'infrastructure constraint mapped area' – refer Change F3-3) over part of the area.
 - c. Application of a 'stormwater constraint mapped area'.
918. The following amendments to the 2GP are proposed in relation to these sites:
- a. In addition, amend Appendix A9 of the 2GP to change the default zone for Mornington School from General Residential 1 to General Residential 2.

20.4.21 Roslyn (south) (IN06)

919. The area proposed for rezoning extends between the existing General Residential 2 areas at Belleknowes (from Bellevue Street) and Roslyn (Sheen Street). It extends both sides of Highgate. An area to the west of Highgate, encompassing Beta and Gamma streets was also assessed (see map in Appendix 6.19); however, this is not proposed for rezoning due to concerns about the impacts on the special residential character (see Appendix 9). This area is within the scope of Variation 2.
920. The sites are zoned General Residential 1 and have been assessed for rezoning to General Residential 2. It is estimated that the rezoning will provide additional development potential for approximately 7 dwellings.
921. See Appendix 6.19 for the site assessment summary.

20.4.21.1 Benefits

922. The area is close to Roslyn Suburban Centre to the north and a high frequency bus route passes through the area. Kaikorai Primary School is close by.
923. The site has very good market desirability.

20.4.21.2 Costs

924. The area has mixed character, with a good representation of established (19th and 20th century) housing, with a higher level of streetscape amenity. The area is capable of absorbing some intensification without a detrimental effect on its character, but the streetscape amenity may be threatened through poorer quality infill and loss of green amenity. Design guidelines may be required to mitigate the potential effects of intensification.
925. There are a number of scheduled trees and four scheduled heritage buildings within the area. Existing 2GP rules require resource consent for activities affecting scheduled trees and heritage buildings. The scheduled items may affect development to a limited extent. Intensification has the potential to compromise the historic setting of the scheduled buildings; however, the 2GP does not currently manage this potential effect.

926. Moderate local and upstream network water supply upgrades are required; however, these are proposed to be included in the 10 year plan. With regards to wastewater, most of the area drains into the central city network. Network upgrades may be required further downstream (the local network has adequate capacity). These are proposed to be included DCC's Infrastructure Strategy. A small area near Belgrave Crescent drains to the Kaikorai Valley / South Dunedin wastewater network. There are existing capacity issues and wastewater overflows within this system and to avoid exacerbating these issues, it is proposed to apply a wastewater constraint mapped area to this area. This limits the development potential to one habitable room per 100m² of site area, compared to the normal General Residential 2 limit of one habitable room per 45m² of site area.
927. There are known stormwater flooding issues downstream. Stormwater attenuation would be ideal but may be difficult to achieve. It is therefore proposed that the maximum impermeable surface limits are kept at the General Residential 1 limit to avoid exacerbating this situation.
928. There are a range of existing issues in the local transport network, including safety concerns due to the older layout of intersections with wide radii, and improvements may be required.

20.4.21.3 *Methods to manage issues*

929. It is proposed to use the following methods to manage identified issues:
- a. Application of a 'wastewater constraint mapped area' (formerly an 'infrastructure constraint mapped area' – refer Change F3-3) over part of the area.
 - b. Apply a 'stormwater constraint mapped area' to maintain the maximum permitted area of impermeable surfaces at the current General Residential 1 Zone level, to manage the risk of stormwater flooding (refer Change F2-7).

20.4.21.4 *Conclusion*

930. As with the Mornington area, this area connects existing General Residential 2 areas and rezoning would allow more flexible, medium density development over a broad area of land above the Town Belt, which has traditionally been a desirable area to live. There are a number of infrastructure issues, but these are manageable. The area is capable of absorbing some intensification without a detrimental effect on its character, but the streetscape amenity may be threatened through poorer quality infill and loss of green amenity. Design guides would be appropriate to mitigate this effect. While there is a relatively high percentage of older, and/or lower value housing, suggesting redevelopment is more likely, the feasible capacity is estimated at only 7 dwellings. Therefore, while rezoning area will not make an impact on capacity at the present time, it provides flexibility of development where landowners consider it appropriate. Furthermore, land and house values may change over time, and this may result in an increased feasibility of development.
931. Overall, at present the benefits of rezoning are limited, but the costs are also manageable, and their scale is related to the scale of development (little development will result in very low costs). Therefore, to provide flexibility of development in a desirable area, and

considering that feasibility of development may change over time, it is proposed to rezone this area General Residential 2.

20.4.21.5 Summary of changes proposed

932. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from General Residential 1 to General Residential 2.
 - b. Application of a 'wastewater constraint mapped area' over part of the area.
 - c. Application of a 'stormwater constraint mapped area'.

20.4.22 133-137 Kaikorai Valley Road, Glenross (IN07)

933. The area is a 5.1ha area sloping down from Roslyn (Northview Crescent) to Kaikorai Valley Road. The area is zoned General Residential 1, with a small area zoned Industrial. The General Residential 1 area has not yet been developed. The owner considers that medium density development is feasible. It is estimated that the rezoning will provide additional development potential for approximately 23 dwellings above the existing General Residential 1 capacity.
934. See Appendix 6.20 for the site assessment summary.

20.4.22.1 Benefits

935. This site is close to the Roslyn Suburban Centre, Kaikorai South neighbourhood centre, Kaikorai Primary School and bus routes along Highgate and Kaikorai Valley. The site slopes to the north and so has excellent solar access.

20.4.22.2 Costs

936. The site slopes steeply, particularly to the western side, which is likely to affect the development potential, although the developer considers that medium density scale development is possible.
937. The site has a high-level hazard associated with slope instability. To manage this risk, a structure plan rule is proposed requiring that geotechnical investigation is undertaken prior to any site development.
938. There are significant issues associated with wastewater management, as the downstream network is at capacity at peak times and wastewater overflows occur. Consequently, rezoning to General Residential 2 is only possible if an on-site communal wastewater detention system manages discharge into the public network. This solution is only supported if over 50 dwellings are to be developed, due to the ongoing maintenance required. For this site, the estimated feasible capacity is 76 dwellings.
939. Stormwater attenuation to pre-development levels would be required to ensure flood hazard levels in the Kaikorai Stream are not increased. It is also recommended that the maximum impermeable surface limits are kept at the General Residential 1 limit to avoid exacerbating existing issues.

940. Construction of appropriate road access may be challenging due to the gradients. Access to Kaikorai Valley Road may require installation of a new roundabout.

20.4.22.3 *Methods to manage issues*

941. It is proposed to use the following methods to manage identified issues:
- a. Apply a 'stormwater constraint mapped area' to maintain the maximum permitted area of impermeable surfaces at the current General Residential 1 Zone level, to manage the risk of stormwater flooding (refer Change F2-7).
 - b. Apply a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way (refer to Change D for detail of the new development mapped area provisions).
 - c. Application of a 'structure plan mapped area' to manage natural hazards. Provisions that apply to this structure plan mapped area are being included in the 2GP in new section 15.8.Z (Kaikorai Valley Road Structure Plan Mapped Area Performance Standards) and new assessment rule 15.12.3.X. A consequential amendment is also proposed to assessment rule 11.6.2.1.i.
 - d. A requirement for a communal wastewater detention system to manage discharge to the Kaikorai Valley network and ensure that wastewater discharge does not exceed the capacity of the wastewater public infrastructure network. This would be a requirement of subdivision consent.

20.4.22.4 *Conclusion*

942. The site has the potential to provide additional medium density scale development close to Roslyn centre and public transport routes. As the site is undeveloped, rezoning would provide for a far more efficient use of the land. Due to the slope, there will be challenges developing the site; however, the developer is confident it is possible. There are a number of infrastructure issues, most critically in relation to wastewater discharge; however, these are manageable.
943. Given the significant increase in capacity resulting from medium density zoning and the location close to services, the benefits of rezoning this site outweigh the costs.

20.4.22.5 *Summary of changes proposed*

944. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from General Residential 1 and Industrial to General Residential 2.
 - b. Application of a 'new development mapped area'.
 - c. Application of a 'structure plan mapped area'.
 - d. Application of a 'stormwater constraint mapped area'.

945. The following amendments to the 2GP are proposed in relation to this site:
- a. Changes are made under Change F3-2 to add a new assessment rule to Rule 15.11.5 (assessment of restricted discretionary activities in an overlay zone, mapped area, heritage precinct or affecting a scheduled item) and Rule 9.6.2 (assessment of restricted discretionary activities - Public Health and Safety section) to require that subdivision provides for a communal wastewater detention system that is designed for development of at least 50 residential units.
 - b. Add a new section 15.8.Z (Kaikorai Valley Road Structure Plan Mapped Area Performance Standards) and new assessment rule 15.12.3.X. A consequential amendment is also made to assessment rule 11.6.2.1.i.

20.4.23 Roslyn (north) (IN08)

946. The area proposed for rezoning extends along both sides of Highgate from the existing Roslyn General Residential 2 area and Roslyn Suburban Centre to Mercy Hospital and the existing Maori Hill General Residential 2 area. The sites are zoned General Residential 1 and have been assessed for rezoning to General Residential 2. It is estimated that the rezoning will provide additional development potential for approximately 50 dwellings.
947. Note that the Mercy Hospital, Columba College, Kaikorai School and Otago Boys High School tennis courts sites were not assessed for rezoning to residential, the default zoning of these major facility zones (the zoning that will apply if land is surplus to the requirements of the facility) is within the scope of Variation 2.
948. See Appendix 6.21 for the site assessment summary.

20.4.23.1 Benefits

949. The area adjoins the Roslyn centre at its southern end and is close at its northern end to the Maori hill centre. There are bus routes along Highgate and down Stuart Street to the CBD.
950. The area is elevated with views towards the harbour.

20.4.23.2 Costs

951. There are a large number of scheduled trees and four scheduled heritage buildings within the area. Existing 2GP rules require resource consent for activities affecting scheduled tree. Intensification has the potential to compromise the historic setting of the scheduled buildings; however, the 2GP does not currently manage this potential effect. The scheduled items may affect development to a limited extent.
952. The area has mixed character, with no dominant built character, but a good representation of established (19th and 20th century) housing stock with a higher level of streetscape amenity. The area is capable of absorbing some intensification without a detrimental effect on its character, but the streetscape amenity may be threatened through poorer quality infill and loss of green amenity. Design guidelines may be required to mitigate the potential effects of intensification.

953. Moderate local and upstream network water supply upgrades are required; however, these are proposed to be included in the 10 year plan. With regards to wastewater, most of the area drains into the central city network. Network upgrades may be required further downstream (the local network has adequate capacity). These are proposed to be included DCC's Infrastructure Strategy.
954. There are known stormwater flooding issues downstream. Stormwater attenuation would be ideal but may be difficult to achieve. It is therefore proposed that the maximum impermeable surface limits are kept at the General Residential 1 limit to avoid exacerbating this situation.
955. There are a range of existing issues in the local transport network, including safety concerns due to the older layout of intersections with wide radii, and improvements may be required.

20.4.23.3 *Methods to manage issues*

956. It is proposed to use the following methods to manage identified issues:
- a. Apply a 'stormwater constraint mapped area' to maintain the maximum permitted area of impermeable surfaces at the current General Residential 1 Zone level, to manage the risk of stormwater flooding (refer Change F2-7).

20.4.23.4 *Conclusion*

957. Rezoning this area would provide a reasonable increase in feasible development capacity and allow more flexible, medium density development over a broad area of land above the Town Belt, which has traditionally been a desirable area to live. There are a number of infrastructure issues, but these are manageable. The area is capable of absorbing some intensification without a detrimental effect on its character, but the streetscape amenity may be threatened through poorer quality infill and loss of green amenity. Design guides would be appropriate to mitigate this effect.
958. Overall, particularly given the location of the area close to services and the estimated feasible development capacity, it is considered that the benefits of rezoning outweigh the costs.

20.4.23.5 *Summary of changes proposed*

959. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from General Residential 1 to General Residential 2.
 - b. Application of a 'stormwater constraint mapped area'.
960. The following amendments to the 2GP are proposed in relation to these sites:
- a. Amend Appendix A9 of the 2GP to change the default zone for Columba College, Kaikorai Primary School, Otago Boys High School Tennis Courts and School Hostel, and the part of Mercy Hospital that is outside the urban biodiversity mapped area, from General Residential 1 to General Residential 2.

20.4.24 Maori Hill (IN09)

- 961. The area proposed for rezoning extends from Mercy Hospital and the Maori Hill neighbourhood centre north towards Woodhaugh. The sites are zoned General Residential 1 and have been assessed for rezoning to General Residential 2. It is estimated that the rezoning will provide additional development potential for approximately 45 dwellings.
- 962. Note that while the John McGlashan College and Maori Hill School sites were not assessed for rezoning to residential, the default zoning of these schools (the zoning that will apply if land is surplus to the requirements of the facility) is within the scope of Variation 2.
- 963. See Appendix 6.22 for the site assessment summary.

20.4.24.1 Benefits

- 964. The area adjoins Maori Hill neighbourhood centre and two schools, and has a high frequency bus route through the area. The area is elevated, generally sloping to the north and east with good solar access.

20.4.24.2 Costs

- 965. There are a large number of scheduled trees within the area. Existing 2GP rules require resource consent for activities affecting scheduled trees. The scheduled items may affect development to some extent.
- 966. The area has a mixed character, with no single dominant built character, but a good representation of established (19th and 20th century) housing stock with a higher level of streetscape amenity and greening/interest. The area is capable of absorbing some intensification without a detrimental effect on the area's character, but streetscape amenity may be threatened, particularly through poorly designed infill, loss of the larger built scale and loss of green amenity. Design guidelines may be required to mitigate the potential effects of intensification.
- 967. Some network water supply upgrades are required; however, these are proposed to be included in the 10 year plan. With regards to wastewater, most of the area drains into the central city network. Network upgrades may be required further downstream. These are proposed to be included DCC's Infrastructure Strategy. A small area including southern half of Prestwick Street and sites between Highgate, Butler Street and Monro Street drain to the Kaikorai Valley / South Dunedin wastewater network. There are existing capacity issues and wastewater overflows within this system and to avoid exacerbating these issues, it is proposed to apply a wastewater constraint mapped area to this area. This limits the development potential to one habitable room per 100m² of site area, compared to the normal General Residential 2 limit of one habitable room per 45m² of site area.
- 968. The stormwater system is likely to be under capacity. Stormwater attenuation would be ideal but may be difficult to achieve. It is therefore proposed that the maximum impermeable surface limits are kept at the General Residential 1 limit to avoid exacerbating this situation.
- 969. There are a range of existing issues in the local transport network, including safety concerns due to the older layout of intersections with wide radii, and improvements may be required.

20.4.24.3 *Methods to manage issues*

970. It is proposed to use the following methods to manage identified issues:
- a. Application of a 'wastewater constraint mapped area' (formerly an 'infrastructure constraint mapped area' – refer Change F3-3) over part of the area to limit density and minimum site size in order to manage potential effects on the wastewater public infrastructure network.
 - b. Apply a 'stormwater constraint mapped area' to maintain the maximum permitted area of impermeable surfaces at the current General Residential 1 Zone level, to manage the risk of stormwater flooding (refer Change F2-7).

20.4.24.4 *Conclusion*

971. Rezoning this area would provide a reasonable increase in feasible development capacity and allow more flexible, medium density development over a broad area of land above the Town Belt, which has traditionally been a desirable area to live. There are a number of infrastructure issues, but these are manageable. The area is capable of absorbing some intensification without a detrimental effect on its character, but the streetscape amenity may be threatened through poorer quality infill and loss of green amenity. Design guides would be appropriate to mitigate this effect.
972. It is noted that a small part of this area (the south side of Highgate from Grendon Street to 580 Highgate (the Presbyterian Church), was the subject of a submission at the 2GP hearing to rezone it to General Residential 2 that was rejected by the panel. The reasons given were that this land was less suitable for further residential intensification including due to the constraint of the busy road and intersection. While some of these sites are unlikely to be further developed, this area is immediately adjacent to the neighbourhood centre and providing for General Residential 2 density provides flexibility and the potential for additional dwellings should landowners wish to further develop. Local roading upgrades can be undertaken if necessary to ensure safety at the intersection.
973. Overall, particularly given the location of the area close to services and the estimated feasible development capacity, it is considered that the benefits of rezoning outweigh the costs.

20.4.24.5 *Summary of changes proposed*

974. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from General Residential 1 to General Residential 2.
 - b. Application of a 'wastewater constraint mapped area' over part of the area.
 - c. Application of a 'stormwater constraint mapped area'.
975. The following amendments to the 2GP are proposed in relation to these sites:
- a. Amend Appendix A9 of the 2GP to change the default zone for Maori Hill School and John McGlashan College from General Residential 1 to General Residential 2.

20.4.25 26-32 Lynn Street, Wakari (IN10)

976. This area is a small extension of the existing Maori Hill General Residential 2 area, and comprises 26, 28, 30 and 32 Lynn Street. The sites are zoned General Residential 1 and have been assessed for rezoning to General Residential 2. Given the small size of the area, the estimated additional development potential is three dwellings.
977. The area was suggested for rezoning by one of the landowners; however, it is noted that rezoning is not supported by the owner of 32 Lynn Street.
978. See Appendix 6.23 for the site assessment summary.

20.4.25.1 Benefits

979. The area is very close to services, including Maori Hill School, Balmacewen Intermediate, the Maori Hill neighbourhood centre and a high frequency bus route.

20.4.25.2 Costs

980. Wastewater drains to the Kaikorai Valley / South Dunedin wastewater network. There are existing capacity issues and wastewater overflows within this system and to avoid exacerbating these issues, it is proposed to apply a wastewater constraint mapped area to this area, as applies to the adjoining General Residential 2 area. This limits the development potential to one habitable room per 100m² of site area, compared to the normal General Residential 2 limit of one habitable room per 45m² of site area.
981. Stormwater attenuation may be required.

20.4.25.3 Methods to manage issues

982. It is proposed to use the following methods to manage identified issues:
- a. Application of a 'wastewater constraint mapped area' (formerly an 'infrastructure constraint mapped area' – refer Change F3-3) to limit density and minimum site size in order to manage potential effects on the wastewater public infrastructure network.

20.4.25.4 Conclusion

983. The area is a small extension of the existing General Residential 2 zone, to include the houses on the eastern side of Balmacewen golf course. It will provide flexibility of development on these sites, and the costs (primarily wastewater discharge) are manageable. Overall, it is considered that General Residential 2 zoning is appropriate.

20.4.25.5 Summary of changes proposed

984. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from General Residential 1 to General Residential 2.
 - b. Application of a 'wastewater constraint mapped area'.

20.4.26 Wakari (IN11)

985. The area proposed for rezoning extends from Wakari School to the Helensburgh neighbourhood centre. It is a relatively small 8.3ha area and has an estimated additional development potential for approximately 14 dwellings. The sites are zoned General Residential 1 and have been assessed for rezoning to General Residential 2.

986. See Appendix 6.24 for the site assessment summary.

20.4.26.1 Benefits

987. The area adjoins a primary school and Helensburgh Neighbourhood centre and is close to Wakari neighbourhood centre. It has good access to public transport. The area slopes gently to the north and has excellent solar access. Almost all housing in the area is pre-1950 or in the lower quartile of Dunedin's house values, suggesting it has good potential for redevelopment.

20.4.26.2 Costs

988. Rezoning is likely to reduce the area's current dominant character, of 1930s state housing style. Intensification will likely result in the need to demolish existing housing in order to add additional units. Design guidelines are recommended to mitigate the potential effects of intensification.

989. Local water supply upgrades are required; however, these are proposed to be included in the 10 year plan. Stormwater attenuation is required to prevent negative impacts on downstream properties and ensure no increase in flood hazard in Leith Stream. Attenuation may be difficult to achieve, so it is proposed that the maximum impermeable surface limits are kept at the General Residential 1 limit to avoid additional impacts.

990. Minor local roading upgrades may be required.

20.4.26.3 Methods to manage issues

991. It is proposed to use the following methods to manage identified issues:

- a. Application of a 'stormwater constraint mapped area' to keep the maximum permitted area of impermeable surfaces at the same area as for the General Residential 1 zone as there are known stormwater constraints in this area (refer Change F2-7).

20.4.26.4 Conclusion

992. Rezoning this area provides some potential for medium density development in part of the city that currently has no medium density zoning, but is close to services and public transport. The estimated increase in feasible capacity is modest (14 units); however, providing for increased development will allow landowners the flexibility to further develop if they wish. The primary cost is a likely change in the character of the area; however, as outlined in the National Policy Statement on Urban Development 2020, this may not in itself constitute an adverse effect. Overall, it is considered that the benefits of rezoning outweigh the costs.

20.4.26.5 *Summary of changes proposed*

993. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from General Residential 1 to General Residential 2.
 - b. Application of a 'stormwater constraint mapped area'.

20.4.27 98 Blacks Road, Opoho (IN12)

994. This property is currently zoned both General Residential 1 (south-eastern half) and General Residential 2 (north-western half). An existing house is located over both zones.

20.4.27.1 *Benefits*

995. Rezoning the General Residential 1 portion of the site to General Residential 2 would tidy up an illogical zone boundary which currently imposes different density restrictions over different parts of the site. It is unlikely to result in additional development potential being taken up due to the siting of the house.

20.4.27.2 *Costs*

996. Any additional development (which is considered unlikely) could exacerbate downstream wastewater overflows. To be consistent with the General Residential 2 zoned part of the site, a wastewater constraint mapped area will be applied over the full site.

20.4.27.3 *Methods to manage issues*

997. It is proposed to use the following methods to manage identified issues:
- a. Application of a 'wastewater constraint mapped area' (formerly an 'infrastructure constraint mapped area' – refer Change F3-3) to limit density and minimum site size in order to manage potential effects on the wastewater public infrastructure network.

20.4.27.4 *Conclusion*

998. Rezoning is appropriate to correct the current split zoning of the property. There are no costs.

20.4.27.5 *Summary of changes proposed*

999. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from General Residential 1 to General Residential 2.
 - b. Application of a 'wastewater constraint mapped area'.

20.4.28 Andersons Bay (IN13)

1000. The area proposed for rezoning adjoins the existing General Residential 2 zoned areas in Andersons Bay, extending over a broad area from Bayfield High School in the north, to

Tahuna Road in the south. The sites are zoned General Residential 1 and have been assessed for rezoning to General Residential 2. It is estimated that the rezoning will provide additional development potential for approximately 35 dwellings.

1001. Additional areas, including an area centred on Aotea Street, Rawhiti Street and the Sunshine area, were also assessed (see map in Appendix 6.25); however, these areas are not proposed for rezoning due to concerns about the impacts on the residential character (see Appendix 9). Rezoning these areas is within the scope of Variation 2.

1002. Note that while the Tainui School site was not assessed for rezoning to residential, the default zoning of the school (the zoning that will apply if land is surplus to the requirements of the school) is within the scope of Variation 2

1003. See Appendix 6.25 for the site assessment summary.

20.4.28.1 *Benefits*

1004. The area adjoins a primary and a secondary school, is close to the Musselburgh Rise neighbourhood centre and has good access to public transport, with a high frequency bus route passing through the area.

20.4.28.2 *Costs*

1005. The character of the area is mixed. Opportunities for intensification are possible without unduly impacting on amenity and existing streetscape/landscape values. Areas that are considered not capable of absorbing intensification have been excluded from the proposed rezoning area.

1006. Significant local network upgrades are required to the local water network; however, these are proposed to be included in the 10 year plan.

1007. There is a significant flooding risk in the surrounding areas as a result of stormwater run-off. As a result, some attenuation is required. It is also recommended that the maximum impermeable surface limits are kept at the General Residential 1 limit to avoid manage this effect.

20.4.28.3 *Methods to manage issues*

1008. It is proposed to use the following methods to manage identified issues:

- a. Apply a 'stormwater constraint mapped area' to keep the maximum permitted area of impermeable surfaces at the same area as for the General Residential 1 zone as there are known stormwater constraints in this area (refer Change F2-7).

20.4.28.4 *Conclusion*

1009. Rezoning the area will provide a reasonable increase in feasible capacity, with relatively few costs, and is considered appropriate.

20.4.28.5 *Summary of changes proposed*

1010. The following amendments to the 2GP maps are proposed in relation to this site:

- a. Rezoning from General Residential 1 to General Residential 2.

- b. Application of a 'stormwater constraint mapped area'.

1011. The following amendments to the 2GP are proposed in relation to these sites:

- a. Amend Appendix A9 of the 2GP to change the default zone for Tainui School from General Residential 1 to General Residential 2.

20.4.29 30 Mercer Street, Kenmure (RTZ1)

1012. The site is a 9.1ha site between Kaikorai Valley Road and Mercer Street, that is currently zoned rural but is subject to a Residential Transition overlay zone (RTZ). This provides for the area to be developed for residential use at a General Residential 1 density, once infrastructure constraints are resolved. The proposal is to remove the RTZ and rezone the site General Residential 2, to allow more efficient use of land. Wastewater infrastructure constraints still remain in the catchment, but will be managed with through use of a communal wastewater detention system. The rezoning would provide for an additional 40 dwellings at a General Residential 2 density.

1013. See Appendix 6.26 for the site assessment summary.

20.4.29.1 Benefits

1014. The site is very close to both Balaclava School and Kaikorai Valley College, and a high frequency bus route runs along Kaikorai Valley Road.

1015. The site slopes to the west, providing for good solar access.

20.4.29.2 Costs

1016. The site is relatively distant (1.8km) from the nearest commercial centre, in Mornington; however, is on a good bus route which passes three neighbourhood centres en route to the city centre.

1017. The site slopes steeply in part and is assessed as having a medium level hazard due to slope instability. Geotechnical investigation will be required prior to development. Appropriate road access (under the Code of Subdivision two access points are required to service more than 20 dwellings) will need consideration.

1018. There are significant issues associated with wastewater management, as the downstream network is at capacity at peak times and wastewater overflows occur. Consequently, rezoning to General Residential 2 is only possible if an on-site communal wastewater detention system manages discharge into the public network. This solution is only supported if over 50 dwellings are to be developed, due to the ongoing maintenance required. For this site, the estimated feasible capacity is 79 dwellings.

1019. A stormwater attenuation assessment will need to be undertaken at the time of subdivision consent. Attenuation is likely to be required to prevent negative impacts on downstream properties and ensure no increase in flood hazard in Kaikorai Stream.

20.4.29.3 Methods to manage issues

1020. It is proposed to use the following methods to manage identified issues:

- a. Application of a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way.
- b. A requirement for a communal wastewater detention system to manage discharge to the Kaikorai Valley network and ensure that wastewater discharge does not exceed the capacity of the wastewater public infrastructure network. This would be a requirement of subdivision consent.

20.4.29.4 Conclusion

1021. This site is already considered suitable for residential development, as evidenced through the RTZ overlay. Rezoning the site to General Residential 2, rather than the General Residential 1 provided for through the RTZ overlay, enables a more efficient use of land. The site is sunny, close to schools and a good bus route. There is also a cycle lane on Kaikorai Valley Road. The site is further from a centre than other proposed GR2 areas; however, this is mitigated by access to public transport.
1022. Removing the RTZ overlay is only possible through use of a communal wastewater detention system to manage flows into the Kaikorai Valley wastewater network. The site will present some challenges due to its slope; however, the developer is confident that at least 50 dwellings can be developed, the minimum necessary for use of a wastewater detention system.
1023. Overall, the benefits of allowing more efficient use of residential land in a good location outweigh the potential costs, and rezoning is appropriate.

20.4.29.5 Summary of changes proposed

1024. The following amendments to the 2GP maps are proposed in relation to this site:
- a. Rezoning from Rural hill slopes (and a small part zoned General Residential 1) to General Residential 2.
 - b. Removal of the Residential Transition Overlay Zone.
 - c. Application of a 'new development mapped area'.
1025. The following amendments to the 2GP are proposed in relation to these sites:
- a. Changes are made under Change F3-2 to add a new assessment rule to Rule 15.11.5 (assessment of restricted discretionary activities in an overlay zone, mapped area, heritage precinct or affecting a scheduled item) and Rule 9.6.2 (assessment of restricted discretionary activities - Public Health and Safety section) to require that subdivision provides for a communal wastewater detention system that is designed for development of at least 50 residential units.

20.4.30 87 Selwyn Street, North East Valley (RTZ2)

1026. The site is a 4.9ha site between Pine Hill and North Road, that is currently zoned Rural Residential 2 but is subject to a Residential Transition overlay zone (RTZ). This provides for

the area to be developed for residential use at a General Residential 1 density, once infrastructure constraints are resolved. The proposal is to remove the RTZ and rezone the site General Residential 2, to allow more efficient use of land. Wastewater infrastructure constraints still remain in the catchment, but will be managed with through use of a communal wastewater detention system. The rezoning would provide for 50 dwellings under General Residential 2 density.

1027. See Appendix 6.27 for the site assessment summary.

20.4.30.1 Benefits

1028. The site is close to North East Valley Primary School, and ideally would have access to Pine Hill School via Truby King Crescent, although this is not certain. There is a high frequency bus route along North East Valley, approximately 280m from the southern end of the site.

1029. A large part of the site is elevated and slopes towards the east with good solar access.

20.4.30.2 Costs

1030. The site is relatively distant (1.4km) from a commercial centre compared to other proposed General Residential 2 areas; however, it has access to a good bus route to the Garden centre and into the CBD. There is also a cycle lane along North Road.

1031. There are some small areas of native vegetation on the site that are considered worthy of protection. A structure plan mapped area is proposed to protect these areas of vegetation.

1032. Significant downstream upgrades are required to the water supply network; however, these are proposed to be included in the 10 year plan. There are significant issues associated with wastewater management, as the downstream network is at capacity at peak times. Consequently, rezoning to General Residential 2 is only possible if an on-site communal wastewater detention system manages discharge into the public network. This solution is only supported if over 50 dwellings are to be developed, due to the ongoing maintenance required.

1033. The site is within the Lindsay Creek catchment, which has an existing flood risk. Stormwater attenuation is therefore required to avoid adversely affecting downstream properties.

1034. There are existing congestion issues at the North Road / Great King Street / Bank Street / Opoho Road intersection (near the Botanic Gardens). Additional development will add to the congestion. An efficiency assessment is currently being undertaken by DCC to determine potential solutions for this intersection.

1035. The inclusion of this site in Variation 2 is predicated on the developer being responsible for the upgrade of the Selwyn Street bridge and the road between the bridge and the site. Additional traffic on Selwyn Street could also present an issue due the width of the road.

1036. The site is subject to a 2GP appeal by The Preservation Coalition Trust to rezone the land from Rural Residential to Rural. This appeal will automatically become an appeal on this part of Variation 2 (Schedule 1 clause 16B RMA).

20.4.30.3 Methods to manage issues

1037. It is proposed to use the following methods to manage identified issues:

- a. Application of a 'new development mapped area' to ensure that subdivision is undertaken in a way that supports best practice urban design outcomes and achieves the strategic objectives of the Plan in an integrated way.
- b. Application of a 'structure plan mapped area' to manage indigenous vegetation clearance.
- c. A requirement for a communal wastewater detention system to manage discharge to the wastewater network and ensure that the discharge does not exceed the capacity of the network. This would be a requirement of subdivision consent.

20.4.30.4 Conclusion

1038. The site has a number of costs, these are manageable. It will provide 50 residential sites, giving additional choice to Dunedin's residents. It is considered that the costs are not significant, and that zoning is appropriate.

20.4.30.5 Summary of changes proposed

1039. The following amendments to the 2GP maps are proposed in relation to this site:

- a. Rezoning from Rural Residential 2 to General Residential 2.
- b. Removal of the Residential Transition Overlay Zone.
- c. Application of a 'new development mapped area'.
- d. Application of a 'structure plan mapped area' to manage biodiversity issues.

1040. In addition, the following changes are made to the 2GP:

- a. Changes are made under Change F3-2 to add a new assessment rule to Rule 15.11.5 (assessment of restricted discretionary activities in an overlay zone, mapped area, heritage precinct or affecting a scheduled item) and Rule 9.6.2 (assessment of restricted discretionary activities - Public Health and Safety section) to require that subdivision provides for a communal wastewater detention system that is designed for development of at least 50 residential units.
- b. Add a new section 15.8.AC (Selwyn Street Structure Plan Mapped Area Performance Standards).

20.4.31 13 Wattie Fox Lane (RTZ3)

1041. 13 Wattie Fox Lane is currently zoned both General Residential 1 (700m²) and Rural (2,350m²). The rural zoned part is subject to a Residential Transition overlay zone (RTZ), which provides for the area to be developed for residential use at a General Residential 1 density, once infrastructure constraints are resolved. The proposal is remove the RTZ overlay and rezone the site to General Residential 1. Although infrastructure constraints in the catchment are not yet resolved, the site is small and the rezoning of 30 Mercer Street to

General Residential 2 (see Change RTZ1) would leave the rural portion of 13 Wattie Fox Lane as a small rural-zoned 'island'.

20.4.31.1 *Benefits*

1042. Rezoning the Rural portion of 13 Wattie Fox Lane to General Residential 1 would remove the split zoning, which currently imposes different rules over different parts of the site, and remove a small, isolated pocket of rural zoned land.

20.4.31.2 *Costs*

1043. Additional development could exacerbate downstream wastewater overflows; however, the impact of this is considered to be minor due to the small area involved.

20.4.31.3 *Methods to manage issues*

1044. No methods are proposed to manage issues.

20.4.31.4 *Conclusion*

1045. There are minor costs associated with the potential for increased wastewater overflows; however benefits of additional development on this piece of land.

20.4.31.5 *Summary of changes proposed*

1046. The following amendments to the 2GP maps are proposed in relation to this site:

- a. Rezoning from Rural to General Residential 1.
- b. Removal of the Residential Transition Overlay Zone.

20.5 Additional sites not considered suitable for rezoning

1047. As noted earlier, a number of sites were assessed for rezoning but are not being proposed for rezoning in Variation 2. These sites include sites derived from the Geographic Information System (GIS) scoring exercise, which were considered suitable to progress to the next assessment stage, and sites suggested by landowners or developers. These sites are listed in Appendix 4.

1048. These sites were rejected as they do not meet (or there is insufficient information to be confident that they would be likely to meet) relevant policy assessment criteria. Having identified that a site was unsuitable for any reason, no further assessment was undertaken. Therefore, the list of reasons for rejection included in Appendix 4 is not necessarily complete, as a full assessment against all policy criteria may not have been undertaken.

1049. Review of the zoning of sites in Appendix 4 is within the scope of Variation 2 and submissions may be made on them.

1050. Note the following sites are subject to a 2GP appeal by The Preservation Coalition Trust (PCT) to rezone the land from Rural Residential to Rural and/or to apply a landscape overlay to the land:

- 147 St Leonards Drive
- 256 Blueskin Road
- 750 Highcliff Road, Peninsula
- 103, 105, 107 Hall Road, Sawyers Bay
- 234/290 Malvern Street, Leith Valley
- 54 Fairview Terrace, Sawyers Bay
- 295-297 Highcliff Road and 347/353/445 Highcliff Road (in part)
- 15 Robin Lane, St Leonards
- 761 Aramoana Road
- 43 Watts Road
- 105 St Leonards Drive

1051. In addition, the following site is subject to a 2GP appeal by the landowner.

- 43 Watts Road - to rezone the site to Large Lot Residential

21 SUMMARY OF VARIATION 2 IMPACT ON HOUSING CAPACITY

21.1 Introduction

1052. The capacity enabled by the changes proposed in Variation 2 was calculated using Dunedin's residential capacity model, which has been developed considering feedback from surveyors and other land development experts.
1053. The capacity model is also constructed to align with the requirements of the National Policy Statement on Urban Development 2020 (NPS-UD) regarding housing development capacity and its factors in the feasibility of developing the development capacity provided and the likelihood of it being taken up.
1054. The following sections summarise the overall impact of Variation 2 on the provision of housing development capacity in Dunedin.

21.2 Rezoning land to residential

1055. There are 16 greenfield areas identified for rezoning to residential zones through Variation 2, with a total feasible development capacity for 604 dwellings.
1056. There are also 15 areas that are currently either zoned General Residential 1 Zone or covered by a Residential Transition Overlay Zone and are proposed to be rezoned to General Residential 2 Zone. Three of these areas are currently undeveloped, with the others comprising existing suburban areas. These rezonings have a total net additional capacity of approximately 765 dwellings. Modelling suggests that the medium density rezoning in Mosgiel will result in the most significant increase in capacity. This is due to the low improvement values and high demand and matches observed recent development trends in this area.

21.3 Rules changes

1057. The rule changes that were tested to determine their impact on housing capacity were:
1058. Allowing a duplex to be built on all properties over 500m² within General Residential 1 and reticulated Township and Settlement zones (Change A2);
1059. A reduction in minimum site sizes for subdivision and development down to 400m² from 500m² in General Residential 1 and reticulated Township and Settlement areas (Change A3); and
1060. Changes to make the minimum site size for subdivision and development consistent and to allow access legs to be included for sites under 1,200m² (Change B4).
1061. It is noted that for Change A2, the aspect of the proposal that enables two residential units in a single residential unit (other than in duplex form) has not been modelled due to the complexities involved. Other changes (such as Change A1 on family flats) may also affect housing capacity but have not been modelled for the same reason. In these cases, it is

considered preferable to exclude these from the model and take a more conservative approach than to overestimate how much additional capacity the changes provide.

1062. Overall, Change A2 and Change A3 allow for a substantial increase in density of residential land use compared to the status quo and provide a substantial amount of plan-enabled capacity. Collectively, these changes are projected to provide for 1510 additional dwellings, using assumptions detailed below.
1063. In addition to the take-up assumptions in the existing residential capacity model, further assumptions were incorporated specific to the proposed changes. To recognise the practical difficulties (e.g. typology, layout constraints) of subdividing sections so that all resulting sections are close to the minimum site size, an average site size of 450m² was presumed to be the maximum development potential for flat greenfield sites. This matches the use of 550m² sections in the residential capacity model for the maximum development potential for flat greenfield sites under the current rules (one dwelling per 500m²). Sites with an average slope greater than 10° were still presumed to require larger section sizes and the rule changes have not impacted on the modelled yields of these sites.
1064. The take-up for duplex developments will depend on developer behaviour and public demand. The housing preferences study demonstrated significant demand for attached typologies in both the inner suburbs and outer suburbs (as well as the inner city). Conversations with developers indicate a willingness to develop duplexes and there has been a recent increase in resource consent applications for duplex developments, particularly in Mosgiel. Resource consents have also been lodged for duplexes and terraced housing in GR1 areas, despite the planning framework not being conducive to these developments. Based on these factors, it is anticipated that there will be at least a moderate uptake of capacity for duplex developments in GR1 and Township and Settlement areas.
1065. While large greenfield developments could theoretically be built to a net density of 40 dwellings per hectare (one duplex per 500m²) under the proposed rule changes, this is considered unlikely. Lower yields are likely to result due to site/layout constraints, developer conservatism, and access to capital. To factor these in, the residential capacity model presumes that no more than half the lots in greenfield developments would have duplexes. Lower yields are also assessed to determine the most profitable development scenario, rather than the model presuming that the highest yield option is chosen by developers.

21.4 Balance between rule changes and rezoning

1066. If no rezonings were made in Variation 2, the capacity added by the rule changes alone would fall just short of meeting medium-term demand. Relying on rule changes to meet demand would require the average annual number of units provided within brownfield developments to double. Many developers in Dunedin focus solely on greenfield developments, which may impact on the ability for the development industry to deliver such a significant increase in brownfield developments. For this reason, Variation 2 includes new greenfield development opportunities in addition to the capacity provided through rule changes. This also contributes to meeting clause 3.2(1) of the NPS-UD, namely, to provide sufficient capacity in both brownfield and greenfield areas.

21.5 Overall results

1067. The rule changes and rezonings proposed in Variation 2 will add significant housing development capacity, as outlined in Table 187 below. Overall, 20% of housing capacity added is through greenfield rezoning, and 80% is through either rule changes or rezoning to a medium density zone.

1068. In addition to these changes, it is noted that there are still several appeals that are seeking new greenfield residential zoning that are likely to be resolved early to mid-2021. Resolution of these appeals will likely add further greenfield housing capacity.

Table 17: Medium-term (2021-30) housing capacity added through Variation 2 by change type

Variation 2 change type	Housing capacity added	% contribution
Rule changes ³⁹	1,573	53%
Greenfield rezoning	604	20%
Medium density rezoning	772	26%
Total	2,948	100%

1069. The contribution of Variation 2 to meeting demand for housing in the short, medium, and long terms is summarised in Table 18 below.

Table 18: Variation 2 additional housing capacity results

Timeframe	2023	2030	2050
Demand ⁴⁰	1,819	5,325	10,688
Existing capacity	1,591	3,684	5,760
Additional capacity as a result of Variation 2 proposals	1,361	2,948	4,096
Total capacity (Existing + Variation 2) ⁴¹	2,952	6,632	9,856
Overall surplus	+1,134	+1,308	-832

³⁹ Rule change capacity figures in this table include capacity added in proposed GR1 rezoning areas

⁴⁰ Incorporating 20% buffer over 2018-28 and 15% over 2028-2048, as required by the NPS-UD.

⁴¹ Capacity that is serviced, feasible, and likely to be taken up.

1070. The proposals provide for sufficient standalone and attached housing capacity to meet demand.

1071. Although a significant amount of additional development capacity will be added through Variation 2 (on top of that resulting from resolution of appeals), the feasible development capacity likely to be taken up is still predicted to be less than the demand for housing in the inner suburbs (Table 19). A large area of the inner suburbs is proposed to be rezoned General Residential 2 in Variation 2 and the remaining area is generally either already zoned General Residential 2 or Inner City Residential or is constrained by capacity in the 3 waters infrastructure.

Table 19: Variation 2 medium-term (2021-30) housing capacity by catchment

Housing catchment	Demand	Existing capacity	Additional capacity as a result of Variation 2 proposals	Total capacity (Existing + Variation 2)	Surplus / shortfall
Inner city	415	27	4	31	-384
Inner suburbs	2,210	883	438	1,321	-889
Outer suburbs	1,325	1,336	1,646	2,982	+1,657
Mosgiel	1,110	1,093	816	1,909	+799
Outer urban area	264	346	43	389	+125
Total	5,324	3,685	2,947	6,632	+1,308

1072. Despite this shortfall, many respondents in the housing preferences study who preferred the inner suburbs also listed the outer suburbs as their second choice, and there is likely to be a significant level of fluidity between the two broad areas in people's housing choices.

1073. Note that the 'inner city' in Table 19 is mostly comprised of Commercial and Mixed Use zoning, which falls outside the scope of Variation 2.

21.6 Overall assessment

1074. The changes outlined in this report give effect to the NPS-UD objective to provide for well-functioning urban environments (Objective 1). In particular, they ensure there will be sufficient feasible housing development capacity over the medium term, and that the housing capacity enabled reflects as far as possible the needs of Dunedin's population in terms of housing types and location preferences. The proposed changes provide a mix of greenfield and urban intensification opportunities and enable a greater density of living and more flexibility in existing suburban environments. Areas proposed for intensification are focussed on those close to public transport and services and/or where there is demand for housing. Changes are proposed to improve the assessment of new large subdivisions to improve overall amenity and urban design outcomes.

1075. A surplus of housing capacity is enabled to limit adverse impacts on the competitive land and development markets and provide choice for residents. The proposals have been considered in light of various infrastructure constraints and, where necessary, additional requirements put in place to manage effects on these networks.
1076. The requirements of the NPS-UD are generally reflected in the RPS Objective 4.5 and its related policies. Protection of the values identified in Policy 4.5.1 and the requirements around managing the effects of growth are reflected in Second Generation Dunedin City District Plan (2GP) objectives and policies and have been given effect to through the assessment process.
1077. In implementing these higher order planning documents, the proposals contained within Variation 2 will more appropriately achieve the purpose of the Act.