

# Variation 2 – Additional Housing Capacity Section 32 Report

**Appendices** 

February 2021

#### **TABLE OF CONTENTS**

- 1.1 Appendix 1 2GP Objectives and Policies referenced in Section 32 Report (December 2020)
- 1.2 Appendix 2 DCC 3 Waters Memorandum on rule changes (December 2020)
- 1.3 Appendix 3 General Residential 1 Assessment of Effects on Residential Character and Amenity (January 2021)
- 1.4 Appendix 4 Sites assessed for rezoning but not included in final proposal (December 2020)
- 1.5 Appendix 5 Site Assessment Criteria Table (December 2020)
- 1.6 Appendix 6 Site Assessments
- 1.7 Appendix 7 DCC Memorandum from Landscape Architect (January 2020)
- 1.8 Appendix 8 DCC Memorandum from DCC Biodiversity Advisor (November 2020)
- 1.9 Appendix 9 Medium density character assessments (January 2021)
- 1.10 Appendix 10 2GP Map Amendments (January 2021)



# Variation 2 – Additional Housing Capacity Section 32 Report

# **Appendix 3**

# General Residential 1 Assessment of Effects on Residential Character and Amenity

February 2021

Prepared by: Peter Christos, City Development, Urban Designer and Andrea Farminer, City Development, Heritage Advisor

# **Table of Contents**

| L               | Introduction and Scope of the Assessment |  |   |    |
|-----------------|--|--|---|----|
| 2               | Assessment Methodology                   |  |   | 1  |
| Assessment of I |  |  | sment of Individual Rule Changes                              | 2  |
|                 | 3.1                                      | Reduce minimum site size to 400m² (from 500m²)     |   | 2  |
|                 |  | 3.1.1  | The current baseline  | 2  |
|                 |  | 3.1.2  | Proposed 400m² baseline                                       | 2  |
|                 |  | 3.1.3  | Key identified constraints and effects                        | 2  |
|                 |  | 3.1.4  | Conclusions and the need for controls/options                 | 4  |
|                 | 3.2                                      | Permitting Duplexes                                |   | 6  |
|                 |  | 3.2.1  | The current duplex baseline                                   | 6  |
|                 |  | 3.2.2  | Duplexes on a proposed 400m² baseline                         | 6  |
|                 |  | 3.2.3  | Key identified constraints and effects                        | 6  |
|                 |  | 3.2.4  | Conclusions and the need for controls/options                 | 7  |
|                 | 3.3                                      | Perm   | it two Stand-alone Units on a proposed 400m² baseline         | 8  |
|                 |  | 3.3.1  | The current baseline  | 8  |
|                 |  | 3.3.2  | Two Stand-alone units on a proposed 400m² baseline            | 8  |
|                 |  | 3.3.3  | Key identified constraints and effects                        | 8  |
|                 |  | 3.3.4  | Conclusions and the need for controls/options                 | 9  |
|                 | 3.4                                      | Allow  | non-family to use 'family flats' on a proposed 400m² baseline | 10 |
|                 | 3.5                                      | Allow  | an existing dwelling to be used as 2 units                    | 11 |
| 1               |  | Summary Assessment of Collective GR1 Rules Changes |   |    |
| 5               | MAP 11                                   |  |   | 15 |

#### 1 INTRODUCTION AND SCOPE OF THE ASSESSMENT

- 1. Variation 2 to the Dunedin City 2nd Generation District Plan (2GP) proposes to provide for some additional intensification of the General Residential 1 Zone (GR1) and Township and Settlement Zone (T&S) (where serviced with wastewater infrastructure) beyond that provided for under the existing rules. These rule changes are designed to facilitate the efficient use of existing residential land within the City's suburbs and Township and Settlement zones to provide additional housing development capacity and housing choice, particularly for smaller residential units.
- 2. The rule changes being considered include:
  - Reduce minimum site size to 400m<sup>2</sup> (from 500m<sup>2</sup>) and;
  - Permit duplexes;
  - Permit 2 standalone units (or provide for as a restricted discretionary activity);
  - Allow non-family to use 'family flats', retaining the same rules around size and scale (note: 'family flats' would not be allowed with any other 2 unit options, i.e. a duplex or a family flat – not both);
  - Allow an existing dwelling to be used as 2 units;
- 3. In all cases, a habitable room approach of one room per  $100m^2$  is proposed where there is more than one residential unit proposed per site; i.e. a duplex on a  $400m^2$  site would be limited to a  $2 \times 2$  bed, or 1 bed plus 3 bed.

#### 2 ASSESSMENT METHODOLOGY

- 4. A streamlined method was adopted for the assessment of the effects on residential character and amenity from the proposed rule changes. Each rule change was initially assessed individually using the following approach:
  - A description of the permitted baseline;
  - A description of the proposed rule change activity and its scope;
  - Identification of the key effects based on familiarity with the GR1/T&S residential areas and mapped data for relevant section sizes (e.g. 800m<sup>2</sup><1,000m<sup>2</sup> sections).
  - Identification of the need/desire for control options to mitigate the potential effects of each rule change.
- 5. This was followed by a higher-level assessment of the potential effects of the rule change package as a whole on residential character and amenity. Comment has been provided on the suitability of the rules being considered and any broader level options for controls to mitigate the potential collective effects.

#### 3 ASSESSMENT OF INDIVIDUAL RULE CHANGES

### 3.1 Reduce minimum site size to 400m<sup>2</sup> (from 500m<sup>2</sup>)

#### 3.1.1 The current baseline

6. The current 2GP density and minimum site size performance standards for GR1 Zone and Township and Settlement Zone (not within the no DCC reticulated wastewater mapped area) is for sites of at least 500m² (Rules 15.5.2.1.a and I, 15.7.4.a and h). This has resulted in a considerable number of sections retaining their generous sizes of usually between 550-900m²; these are typically occupied by a main dwelling with a garden to the rear and ancillary smaller structures (e.g. single garage and/or garden shed(s). This typical GR1/T&S zone arrangement has partly contributed to the development of the often 'leafy' character of these residential areas through providing sufficient garden space for mature trees and larger shrubs to develop. In combination with the contemporary architectural styles and materials developed in each period from the late 19th century onwards, and the localised topography across Dunedin's suburbs, this has created suburbs and townships where substantial greening is a key part of their discrete residential character.

#### 3.1.2 Proposed 400m<sup>2</sup> baseline

- 7. The proposal to allow a minimum site size of 400m² across the GR1 and T&S zoned areas has been developed to encourage intensification of residential development in order to provide more space for new dwellings within the existing suburban boundaries. The anticipated outcome of a 400m² minimum site size is an increase in the subdivision of existing developed residential sites to accommodate a new dwelling while meeting the existing performance standards for height, set-backs, site coverage, etc. It is also envisaged that many of these new dwellings will be smaller in size than their established counterparts and may entail more site responsive designs to deliver high quality living environments.
- 8. A map showing the distribution of sites sized 800m² to 1000m² in size which would potentially be able to be subdivided as a result of this rule change (subject to other site constraints) is shown in Map 1.

#### 3.1.3 Key identified constraints and effects

- 9. The key constraints on reducing the minimum site size to 400m<sup>2</sup> across the GR1 and T&S zoned areas, are identified as follows.
  - The operative performance standards for permitted development activity across
    the zones will be retained with the likely result that impermeable surfacing (<70%),
    set-backs (<4.5 and <2m), building height (<9m) and others will naturally constrain
    some sites from being capable of additional development without a resource
    consent.</li>
  - The ability to provide vehicle access to rear sections and the location of newer or high-value existing buildings will constrain some development options
  - Issues of extra- and intra-section privacy and amenity, economic viability to subdivide and develop smaller sites, and natural constraints from local topographic

features (e.g. sites located on extreme slopes, next to gullies, and adjacent to scheduled items) will also influence the capacity of existing 800-999m<sup>2</sup> sites to be subdivided as of right.

- 10. One key effect of reducing the minimum site size to 400m<sup>2</sup> across the GR1 and T&S zoned areas, is the potential for the demolition of existing dwellings on 800 999m<sup>2</sup> sections to make way for subdivision for the erection of a new unit on each section. This may arise from:
  - where either the existing dwelling is of older and/or poorer building stock,
  - awkwardly situated on one part of the original section so preventing subdivision,
  - or the economic situation makes demolition viable to erect new, efficient homes.
- 11. This may have the effect of gradually altering the mixed residential characters of the various suburbs and Township and Settlement zoned areas, through the loss of often older, 'character' dwellings that contribute to the character of the suburbs. The risk of this effect on the character and amenity values of the GR1 and T&S zoned areas is considered to be moderate and will be dispersed across the zones. It is worth noting that the only GR1/T&S zoned area that is covered by a Heritage Precinct overlay is the Windle Settlement in Rosebery and Newport Streets, Belleknowes. Controls are in place to protect the heritage character values of this area.
- 12. A second effect of the proposal is the anticipated intensification of the GR1 and T&S zoned areas, which may result in a gradual change of their residential neighbourhood character through overdevelopment of sections, with a consequent impact on their built character and pattern of development that has evolved over 150 years of settlement across Dunedin. The potential for the character and pattern of development of such neighbourhoods to become diluted by an increase in possibly smaller, contemporary-style dwellings is a risk that may adversely alter the existing neighbourhood character of the areas, but the actual effects would depend on the design of the new development. The potential for adverse effects on neighbourhood character would be higher where new houses were placed at the front of a section containing an existing dwelling to the mid or rear of the section. Likewise, if twostorey houses are constructed close to the rear of an existing, character one-storey dwelling, such as a small timber cottage or early brick bungalow, then they risk visually dominating the scale of the older dwelling. However, it is noted that existing dwellings on the steeper residential hillslopes of Dunedin already create a 'tiered' development pattern, and significant historic undersized site subdivision exists throughout the city, which actually contributes to the city's built residential character.
- 13. A third effect of reducing the minimum site size to 400m² across the GR1 and T&S zoned areas, is the likely loss of valuable gardens, mature trees and hedges, and greenery that contribute to the visual character of the residential neighbourhoods and streetscapes, and provide high quality amenity value to residents. As with many types of effects that may be local in extent, but repeated across large areas, the potential cumulative effects of the reduction of residential gardens, trees and greening may result in a more substantial loss of neighbourhood amenity, habitat and character, albeit over a 10 20 year period, for example.

#### 3.1.4 Conclusions and the need for controls/options

- 14. From a neighbourhood built character perspective, the cumulative effect of the potential demolition of older and/or existing housing stock is considered to be low as it is likely to take place over an extended timeframe and dispersed area. As such, its likely effects are considered to be no greater than those of the current 500m² site permitted baseline in this regard. Therefore, no requirement for controls to mitigate this potential effect are considered necessary.
- 15. The potential effect of general intensification across the GR1 and T&S areas is considered to be moderate on the built character of the residential neighbourhood areas; therefore, some controls should be considered to mitigate these effects. Options for controls could include:
  - 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; in this instance new dwellings will be required to meet the current setback requirements (Rule 15.6.13).
  - Relaxing the minimum parking requirements, as will occur in giving effect to the new NPS-UD, Policy 11.

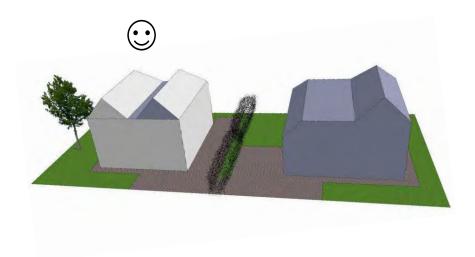


Figure 1: New dwellings should not be located in front of an existing house on a front site. Where site depth exceeds width, new dwellings only need to comply with 2GP standards.



Figure 2: New dwellings should not be located in front of an existing house on a front site. Where site depth exceeds width, new dwellings only need to comply with 2GP standards.

- 16. From a neighbourhood amenity perspective, the cumulative effect of a loss or reduction in mature gardens, trees and greening is considered to be moderate albeit, it too is likely to take place over an extended timeframe. It is considered that mature gardens, trees and planting will be more susceptible to the adverse effects of subdivision and new development than the other identified effects, requiring some controls to be adopted to mitigate these effects. Options for controls could include:
  - Those gardens identified as high quality gardens (for example, the research project undertaken by the University of Otago: Freeman C, Mathieu R and Jagannath A (2007), Mapping Private Gardens In Urban Areas Using Object- Orientation Techniques And Very High-Resolution Imagery. Landscape and Urban Planning, journal 81, p179-192) will require a resource consent process as a restricted discretionary activity if subdivision proposes to remove the garden.
  - The removal of any pest plant species should be permitted.

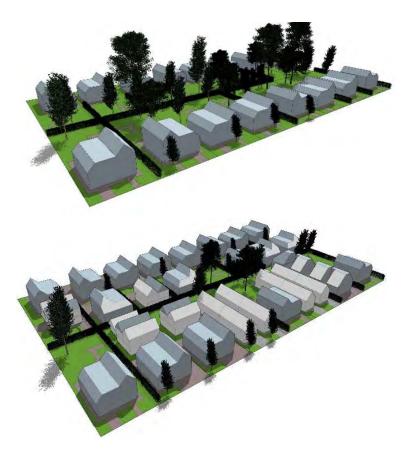


Figure 3 and 4: As subdivision intensifies, loss of established trees and gardens could impact on Dunedins' residential character.

#### 3.2 Permitting Duplexes

#### 3.2.1 The current duplex baseline

17. The 2GP minimum site area for GR1 and Township and Settlement Zone is 500m<sup>2</sup> per residential unit; therefore, duplex units are only permitted on a minimum site size of 1,000m<sup>2</sup> (Rule 15.5.2). The normal performance standards for unit development in the GR1 and T&S zones apply.

#### 3.2.2 Duplexes on a proposed 400m<sup>2</sup> baseline

18. The proposal to permit duplex development on proposed 400m<sup>2</sup> minimum sized sites is similarly aimed at encouraging intensification of smaller-scale residential development in order to provide more space for new dwellings within the existing suburban areas. The normal performance standards for unit development in the GR1 and T&S zones would still apply aside from the reduced minimum site size and application of the habitable room approach to the density performance standard (1 habitable room per 100m<sup>2</sup> site area).

#### 3.2.3 Key identified constraints and effects

19. The key constraints on allowing the development of duplex units on a proposed 400m<sup>2</sup> minimum site size across the GR1 and T&S zoned areas, are identified as follows.

- The range of constraints will be similar to those already identified for a proposed minimum site size of 400m<sup>2</sup> (refer to section 3.1.3).
- The smaller site size for duplex units may increase pressure on privacy issues such
  as screening, amenity space and shared accessways (i.e. through two families
  occupying a normally single unit section) which may deter some development of
  these types of units in the GR1/T&S zone.
- 20. The general effects of allowing duplex development on the smaller site are considered to be generally the same as for the proposed single unit 400m<sup>2</sup> site size (refer to section 3.1.3).
- 21. One effect or risk specific to duplex units is from subdivision on the long axis of a section (away from the frontage) which could result in the construction of long, thin narrow buildings with a minimal street frontage. This risks having either little or no distinguishable pedestrian entrance to the street frontage or possible dominance of garages/car parking at the front due to a lack of suitable space on the section. This is likely to detract from the strong residential character and amenity values of neighbourhoods, in the long-term. The likelihood of this effect is considered to be low due to existing plan constraints on vehicle parking and crossings, site permeability and location of amenity space; however, the risk remains and could be detrimental.

#### 3.2.4 Conclusions and the need for controls/options

- 22. Overall, the proposal to allow duplex unit development on the proposed 400m<sup>2</sup> site size has no specific effect from the risk of long, thin duplexes being constructed on a section, if subdivided perpendicular to the frontage rather than parallel to it. This has the potential to adversely affect the existing residential character of the zones and, therefore some control is recommended for consideration, as follows.
  - 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').
  - 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.).



Figure 5: Clear guidance promoting minimal street façade articulation would avoid garages and blank facades dominating narrow sites.

### 3.3 Permit two Stand-alone Units on a proposed 400m<sup>2</sup> baseline

#### 3.3.1 The current baseline

23. The 2GP baseline for GR1 and Township and Settlement Zone minimum section sizes is 500m²; therefore, two stand-alone units are permitted on a minimum site size of 1,000m² (Rule 15.5.2). The normal performance standards for unit development in the GR1 and T&S zones apply.

#### 3.3.2 Two Stand-alone units on a proposed 400m<sup>2</sup> baseline

24. The proposal to permit two stand-alone units to be developed on proposed 400m<sup>2</sup> sites is again aimed at encouraging intensification of smaller-scale residential development in order to provide more space for new dwellings within the existing suburban areas. The normal performance standards for unit development in the GR1 and T&S zones would still apply aside from the minimum site size.

#### 3.3.3 Key identified constraints and effects

- 25. The key constraints on allowing the development of two stand-alone units on a proposed 400m<sup>2</sup> minimum site size across the GR1 and T&S zoned areas, are identified as follows.
  - The range of constraints will be similar to those already identified for a proposed minimum site size of 400m<sup>2</sup> and duplex development (refer to sections 3.1.3 and 3.2.3).
  - Similar to the proposed duplex development, the smaller site size for two standalone units may increase pressure on privacy issues such as screening, overlooking

- neighbouring amenity space, shading and shared accessways (i.e. through two families occupying a normally single unit section) which may deter some development of these types of units in the GR1/T&S zone.
- Given the performance standards regarding the bulk and location of buildings, it is
  also very unlikely that two stand-alone units could be constructed on a site of the
  minimum size.
- Development of two stand-alone units on one site will also be affected by the ability to subdivide these into two separate properties to improve resale value.
- 26. The general effects of allowing duplex development on the smaller site are considered to be generally the same as for the proposed single unit and duplex unit development on a 400m<sup>2</sup> site size (refer to section 3.1.3 and 3.2.3).
- 27. One effect specific to a proposed, two stand-alone unit development on a 400m² site size, is the likelihood of the appearance of over-intensification of development on these sections, which may have an adverse effect on the generally larger-scale residential character of the GR1/T&S zone neighbourhoods. If sections are developed with two smaller, stand-alone units in a dispersed nature across the zones then their impact is likely to be negligible, as they will combine into the existing mixed streetscape character of these areas. However, if they are concentrated or side-by-side sections are both developed with pairs of stand-alone units, then their effects may be more noticeable and risk altering the existing character and amenity status quo. Having two small units on a 400m² site is also likely to place pressure on the available amenity space to a greater degree than a duplex unit from the separate footprint of each building making a less efficient use of the section space.

#### 3.3.4 Conclusions and the need for controls/options

28. Overall, the proposal to allow two stand-alone, unit developments on the proposed 400m² site size has no specific additional effects than that for a single unit development. The only perceivable effect identified is from the risk of a concentration of over-intensified sections featuring pairs of small stand-alone units that could have the effect of altering the current residential streetscape character of the zones. Unlike duplex development, pairs of stand-alone units are not considered to be as effective in delivering the desired goal of urban intensification due to a less efficient footprint and potential loss of amenity space because of this. It is noted that Building Act spatial distance requirements may also come into play more for two stand-alone units in terms of fire separation, than those required for duplex units.



Figure 6: Duplex development is preferred over two standalone units on a rear site.

### 3.4 Allow non-family to use 'family flats' on a proposed 400m<sup>2</sup> baseline

- 29. The current baseline for family flats in the GR1 and Township and Settlement zones is a maximum gross floor area of 60m² on a 500m² minimum section size with shared services and common ownership/tenancy basis (rule 15.5.14.1 and .2). The proposal to allow nonfamily to use existing and future 'flats', presumably on a tenanted basis, is not considered to have any perceivable effects on the residential character, streetscape and amenity of the zones. There is a slight risk of an increase in the number of flats that might be constructed in the future, but this will largely be constrained by the available space and existing layout of sections and the desirability and viability to construct small flats over larger, multi-unit flats which are more economically viable. In view of this risk, it is recommended that the following control option is considered:
  - New 'family' flats are to be located to the rear of an existing dwelling or new dwelling to reduce the visual effect of the building on the residential streetscape character.

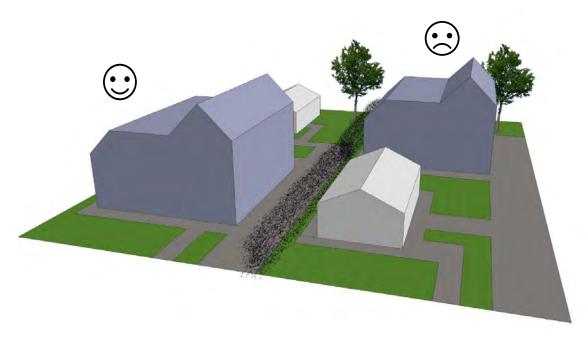


Figure 7: Providing for family flats on rear sites only will help to control visual effects of intensification.

#### 3.5 Allow an existing dwelling to be used as 2 units

30. The current baseline for a single unit dwelling is a density of 1 residential unit per 500m² with a maximum development potential of 1 habitable room per 100m² per site (rule 15.5.2). The proposal to allow two residential units/families to occupy an existing dwelling is likely to have minimal discernible effects on the existing residential character or amenity values of the GR1 and Township and Settlement zones as the status quo will largely be maintained from a character and amenity perspective. However, the division into two units is likely to require the creation of separate outdoor living spaces, parking spaces and service areas. These activities may have some visual effect through altering the existing arrangement of garden, parking and other amenity spaces, and probably introducing new features such as screening, hedging and an increase in impermeable surface treatments. These modifications are considered to be minor in terms of residential character and amenity values.

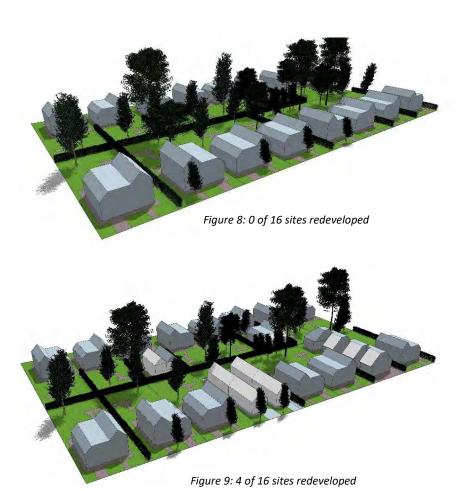
#### 4 SUMMARY ASSESSMENT OF COLLECTIVE GR1 RULES CHANGES

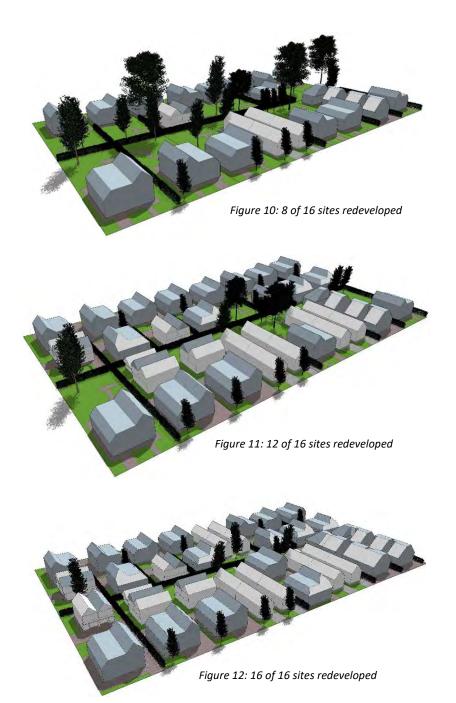
- 31. Taken as a package, the proposed GR1 and Township and Settlement Zone rule changes will allow for an increase in general residential capacity across the zones through capitalising on the available eligible development space. It has been identified that some of this new capacity will be naturally reduced by existing conditions and constraints on individual sites and landowners, such as:
  - economic viability and market dynamics,
  - topography and site conditions,

- some challenge around reaching existing performance standards on the smaller site size.
- 32. In terms of the effects of the package on the residential character and amenity values of the various neighbourhood areas contained within the zones, it is generally considered that only one proposed option providing for two stand-alone units on a 400m² minimum site size has the potential for long-term effects. This has been assessed as leading to potential over-intensification of smaller sites without the efficiencies provided by a duplex style development. The effect of this is a risk to the existing residential character and amenity values of the zones through an increase in multiple small house-sections that diminishes the established streetscape character and pattern of development and balance of greenspace. This is particularly relevant within GR1 areas with a more mixed and spacious residential character and particularly Township and Settlement zones. Therefore, it has been recommended to exclude this proposed element from the rule package due to the lack of benefit and potential risk it carries. As an alternative, permitting two units per site could be considered through a restricted discretionary consenting pathway to enable design to be managed.
- 33. A key effect of the proposed 400m² minimum site size is identified as a potential risk to the green amenity values of the zones through the loss of mature gardens, trees and other planting. As such, this effect also applies to the proposed rule change package as a whole, through the potential for increased subdivision and expected intensified development to increase the loss of garden amenity. Whilst it is recognised that some sections with mature, well-planted sections will be subject to redevelopment loss, there will also be some gardens of little amenity value other than the unoccupied space they provide. Options for addressing these differences and placing controls to mitigate or limit the loss of quality gardens and amenity values are outlined in section 3.1.4.
- 34. Taking a whole rule change package perspective, it may be that one of the ways a number of the effects identified through the assessment can be addressed is through the preparation of a residential development and streetscape design guide. Such a design guide has not been prepared previously for the General Residential 1, and Township and Settlement Zones; such a document could include clear guidance on the preferred and best approaches to managing good subdivision through identifying/illustrating:
  - guidance on expectations to be delivered through the new rule package;
  - ways to retain mature planting in new subdivisions;
  - suitable new planting where mature species cannot be retained;
  - examples of good site layout and locating parking/garage;
  - examples of good building style and arrangements (e.g. typical frontage arrangements, pointers to surrounding residential streetscape character identification, bulk form examples, roof design, materials and minimum ratio of glazing to elevation, etc).

- 35. Additional, to design guides, removal of 2GP minimum parking requirements in accordance with the NPS-UD would provide for the development of smaller sites with improved options for locating amenity space encouraging additional landscape elements.
- 36. Visual effects and loss of green amenity over a range of intensification. All of the below examples are modelled on a residential block made up of 16 x 800m² sites. An estimated average amount of established vegetation is shown.

Figures 8 – 12: Visual effects and loss of green amenity over a range of intensification. The examples below are modelled on a residential block made up of  $16 \times 800 \text{m}^2$  sites. An estimated average amount of established vegetation is shown.





## 5 MAP 1

Sites sized between 800m<sup>2</sup> and 1000m<sup>2</sup> in the main urban areas of Dunedin that could potentially benefit from the proposed rule change (relevant sections identified in pink)

