

THIS 14 September 2021

BEFORE THE 2GP HEARING PANEL

IN THE MATTER of the Resource Management Act 1991

AND

The Second Generation Dunedin City District Plan (2GP)

**HEARING TOPIC: VARIATION 2 – ADDITIONAL HOUSING CAPACITY OF THE
SECOND GENERATION DUNEDIN CITY COUNCIL PLAN (2GP)**

UNDER Clause 6 of First Schedule, of the Resource Management Act 1991

STATEMENT OF BARRY JAMES DOUGLAS

Dunedin Resident, of 14 Jubilee Street, Belleknowes, Dunedin, 9011

PROPOSED CHANGE IN05: Rezoning from GR1 to GR2 – Mornington (North)
(being the area identified in Appendix 10 (p.22) 2GP Map Amendments).

1. INTRODUCTION

My name is Barry James Douglas. I am a long time Dunedin resident, residing on the eastern slope of Hawthorn Hill, in the Mornington -Belleknowes suburb. I have previously provided a written submission on this 2GP2 Variation 2 matter, dated 3 March 2021.

My Submission and this Statement primarily relates to the Mornington zone change from General Residential 1 to General Residential 2 (Proposed change IN05), more specifically, regarding the detrimental impact the policies and rules associated with this change could have on the built environment and residents.

While my comments primarily relate to the Mornington rezoning proposal, they are also generally applicable to other rezoning changes, IN06 – Roslyn (south); IN08 – Roslyn (north); and IN09 – Maori Hill. These areas all share a similar topographic aspect, generally (though not exclusively), sloping eastward (toward the harbour), between the Kenmure – Highgate ridgeline and the Town Belt.

My written submission (March 2021), accepted in part the proposed rezoning Change IN05, but notably requested the following significant amendment – to exclude the northern area of this zone, being the suburb more generally identified as Belleknowes as bounded to the south by Hawthorn Avenue and to the west by Kenmure Road. Alternatively, my concerns could be satisfied by planning policies and rules that mitigate the detrimental effects from new infill builds on the existing built environment.

2. CHARACTER AND AMENITY VALUES OF MORNINGTON NORTH – (BELLEKNOWES)

- 2.1 The built environment of Belleknowes is generally of a higher quality housing stock and the newer replacement housing is similarly of higher quality. Many of the older (heritage) homes in Belleknowes have been significantly restored to include warmer home provisions.
- 2.2 Gardens, mature trees, hedges, shrubs and tree lined streets are valued and common through the suburb and provide a welcome roost and source of food for birds, particularly native species (tui, bell birds, kereru and NZ fantail) venturing from the nearby Town Belt. Many of the streets are tree lined.
- 2.3 This is a peaceful suburb, close to the inner City where spatial privacy, afforded by site size, sunshine and often uninterrupted views of the City are highly valued. These amenity values of the natural environment, as preserved by the present 500m² minimum section site size, will be placed under pressure, and for some unfortunate residents, will, to various degrees, diminish from the overshadowing effects of additional housing units on smaller lots.
- 2.4 It is desirable suburbs like Belleknowes and those suburbs to the north immediately above the Town Belt, that contribute to make Dunedin a special place to live.
- 2.5 The proposed DCC planning led change to increase the density of housing infills on smaller lots (minimum 300m²) in this suburb and those further north in Roslyn and Maori Hill is meddling with the wisdom and vision of Dunedin forefathers and will not have the blessing of many ratepayers!

3. DETRIMENTAL EFFECTS OF THE PROPOSED REZONING CHANGES FOR MORNINGTON NORTH.

- 3.1 The proposed 2GP Plan Amendments encourage the highest development densities in the most accessible locations, being in the central city and suburban centre zones that include the proposed rezoning areas IN05, IN06, IN08, IN09 (Mornington to Maori Hill (Policy 2.2.2.4c; Variation 2 Proposed Plan Amendments, February 2021).
- 3.2 The existing operative plan allows for smaller non-complying site sizes within the Mornington – Belleknowes area through resource consent approval after correctly considering the opinions of deemed affected neighbouring parties. In my opinion, there is no need for change.
- 3.3 The proposed rezoning of this area to General Residential 2 and the implementation of change to a reduced minimum site size (amending Rule 15.7.4) and density (amending Rule 15.5.2) will, in many cases, negate the opportunity of neighbouring affected parties to voice their concerns to Council on a significant matter that might detrimentally affect the environmental amenity values they presently enjoy on their property. The right of deemed affected parties to be heard before a planning committee on important fundamental matters such as noncompliant lot size issues is embedded in the RMA consenting process. That process is negated in the 2GP Plan by the proposed rezoning from GR1 to GR2 that provides for compliant minimum site areas of 300m² where subdivision applies. There is no right of redress from affected parties. This is a position that reeks of *"Council planners know best,"* overshadowing the concerns of affected resident City ratepayers.
- 3.4 The loss of green yard spaces from additional housing capacity and the consequential reduction of permeable ground space from additional housing capacity within the residential zone (IN05) identified as a stormwater constraint area (Appendix 10, p.22 2GP Map Amendments; February 2021), will further strain known stormwater issues downstream.

- 3.5 The benefits of rezoning Mornington (north) (IN05) are summarized in the Variation 2 Section 32 Report (p.170, February 2021), but there is limited identification of the detrimental effects that housing intensification will have on existing residential living and amenity standards and environmental values that make Mornington (north), Roslyn and Maori Hill desirable residential suburbs.
- 3.6 Further, the summary of “*Assessment Criteria*” identified in the DCC Variation 2 Section 32 Report – Appendices; p.67 (February 2021), identifies the solar access aspect as “*good*”, being generally east facing. I take issue with that DCC planning assessment. No mention is made to the real detrimental overshadowing effects housing intensification can have on limiting solar access to the existing built environment. Already, low winter sun reduces hours of direct solar access and the benefits of the sun to heat buildings in much of this area. This is more particularly so for homes located on lower eastern slopes and gully areas without a northerly aspect, and on those other properties with very limited solar access during the coldest winter months due to overshadowing effects from existing buildings and trees. For those homes, housing intensification will compound those solar access limitations.
- 3.7 No specific detail is given to the effects on the existing housing properties of the bulk, height, location standards for General Residential 2 infill housing on the new allotments (as diagrammatically identified Figure 15 6F-2; GP2 District Plan). The conditions provide for inbuilt house development up to 1m from the property boundary, and objectives and rules for new site design that encourage maximising solar access, enhance environmental performance and energy resilience as outlined in Objective 2.2.2 (2GP Proposed Plan Amendments – February 2021). However, there is little, if any, consideration of the overshadowing effects of new house builds on the existing housing stock, and no opportunity for redress by the detrimentally affected party.
- 3.8 Plans for intensifying urban land supply as proposed by the rezoning plan amendments should, in my opinion, ideally more properly consider the impact of infill housing on the existing stock and the detrimental ensuing loss of amenity and heritage values. My particular concerns relate to; **a).** loss of solar access, particularly winter solar loss to buildings for natural heating and light **b).** the loss or reduction of natural ventilation (air flow) causing damp – wet surfaces, both on the ground and on buildings where infill builds are located close to boundaries and

existing homes. **c).** the loss of usable and sunny garden or yard space for outdoor living and gardens, for interaction with neighbours and outdoor privacy. **d).** the loss of trees, and green yard spaces that are the habitat of birds that regularly feed and roost, including the many native species that daily venture from the adjacent town belt.

- 3.9 It is the built heritage homes, their link to the history of the neighbourhood, their open yards, trees, gardens and green spaces, and wildlife that contribute to make the elements of Mornington (north), Roslyn and Maori Hill the desirable residential environment for residents and visitors to appreciate and enjoy. It is likewise the health and well-being of these suburbs, their place within the visual streetscape of the city, nestled above the town belt that appeal and contribute to the wider city landscape and aesthetic appreciation of the city for residents and visitors to enjoy.
- 3.10 The Section 32 report (section 20.4.20.1, paragraph 906 – 908) identifies the fitness '*benefits*' of the area for additional housing capacity. The mentioned benefits of elevated views to the harbour, positive streetscape, quality housing, and good market desirability are all existing prevailing amenity values, that result from the preserved natural environment and debated development under planning rules that have more generously provided for the views of affected parties to be heard by Council. Personally, I take strong issue with the Section 32 Report claim (section 20.4. 20.1, paragraph 907) that intensification of housing capacity will not overly affect the character of the area. I have little confidence that Council guidelines "*recommended to ensure new housing respects the build form and scale of existing development*". I am of the view that infill housing development will in many instances detract on the existing heritage values, and impact negatively on the well-being of neighbours cast into shadowy gloom during winter months.
- 3.11 The DCC Section 32 Report for Mornington North (section 20.4.20, paragraph 903), estimates the rezoning of this area will provide additional development potential for approximately 25 dwellings.
- 3.12 The stark reality for me is the potential development of an approximately 1778m² section directly bounding my residence in Jubilee Street, Belleknowes, that could, by the demolition of the existing large, beautiful, historic character residence, provide for up to 6 – 10 units which could, through increased residential activity

(eg. noise, loss of privacy), removal of trees and shading from densely located units, severely detrimentally impact on the peaceful, warm surroundings of my family home. Given my situation, I think the potential of additional housing from rezoning of the area may be significantly higher than the 25 dwellings estimated in the Section 32 Report (20.4.20, paragraph 903). Housing intensification of the type allowable under the proposed plan rezoning (Change IN05) for “Mornington – Belleknowes” to General Residential 2 and proposed new rules allowing increased housing density could, in my specific case, severely adversely impact my property and neighbouring properties, and is likely to similarly impact more widely elsewhere in the area identified for rezoning by Change IN05.

4. CONCLUDING REMARKS

- 4.1 The underlying drive for Variation 2 and rezoning Change IN05 is the projected population growth. While there has been a very small 2019 sample survey of 770 Dunedin residents 'Housing Preferences', there has been no general widespread discussion on the optimum population size for Dunedin, (nor indeed nationally for NZ). Dunedin infrastructure services are already stressed. Tampering with the operative Dunedin District Plan to add housing capacity within the built environment without robust representative consensus and discussions with Dunedin residents is not, in my view the appropriate way to proceed. I have no recall of this matter as a significant debate issue among Council candidates during the 2019 Dunedin City Council Local Body elections.
- 4.2 Council has a duty under the RMA (section 32) to consider alternatives and assess benefits before adopting any objective, policy, or rule to consider alternative means available in relation to any specified function, and that is provided in Appendix 4 of the Variation 2 Section 32 Report, (*"Sites assessed for rezoning but not included in the final proposal"*). In this respect, I consider the suburb of Brockville a glaring omission from the areas assessed for rezoning. Brockville is an ideally placed alternative (in my view a better placed alternative than *'Mornington north'*) for urban infill housing expansion. It boasts magnificent panoramic views, all day sun, very good winter solar access, good roading network, many large sections (typically in the order of 700-900m²), with relatively stable ground conditions, and all within a short distance (approximately 5 -6 km) from the City Centre. This is a needy area of the City that could benefit significantly from new redevelopment.