

# BRCT contribution to the Second Generation District Plan, 30 Sept 2013



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## **Contribution to the Dunedin City Council's *Second Generation District Plan*.**

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## **BRCT contribution to the Second Generation District Plan, 30 Sept 2013**

### **1 Overview**

Thank you for this opportunity to contribute to the Dunedin City Council *Second Generation District Plan (2GDP)*.

The Blueskin Resilient Communities Trust (BRCT) is a registered charitable trust formed in 2008 out of the need to support local sustainability and transition initiatives in a planned and structured way. Our core activity is supporting the development of a resilient energy system in Blueskin Bay and we provide services for individuals and groups in Blueskin and Dunedin. Jeanette Fitzsimons is our patron.

We wish to acknowledge the strategic value of public policy and support the Dunedin City Council's approach to secure public participation in the development of policy.

The 2GDP is well thought out BRCT and is very supportive of the DCC's current thinking on the 2GDP and how best to provide for renewable electricity generation. In our contribution we do not have any divergence from the thrust of the 2GDP: we strongly support the 'Strategic Directions' and our suggestions in this contribution are intended to improve the use of the 2GDP so that it will stand the test of time in providing value to the community, our environment and the economy.

**We are willing to meet with planners as the draft 2GDP progresses if we can assist in any way and we congratulate the 2GDP team for excellent work to date.**

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## 2 Specific Recommendations

### 2.1 Strategic Directions

We support the proposed 'Strategic Directions' and approve them as stated. In particular we approve the order of the strategic themes.

#### Actions:

We request that the Council:

1. Make no significant change to 'Strategic Directions' and make no change to the order of the Strategic Themes.

### 2.2 Renewable Generation

We are extremely supportive of the new provision for Renewable Generation within the 2GDP. We recognise that the DCC in the 2GDP is conscious of implementing the National Policy Statement on Renewable Electricity Generation, meeting objectives set out in Dunedin's Spatial Plan and is providing a sound policy framework.

As stated in the National Policy Statement on Renewable Electricity Generation, "*The contribution of renewable electricity generation, regardless of scale, towards addressing the effects of climate change plays **a vital role** in the wellbeing of New Zealand, its people and the environment.*"

We agree with the goal for managing Renewable Energy Generation and we would go further and suggest that REG is the most desirable form of energy production and that we should seek to facilitate growth in REG as a priority to provide for our environment, our communities and our economy.

#### *On-site energy generation*

We support the suggested changes in your letter of the 4<sup>th</sup> September for on-site generation. We would prefer that no resource requirement be made for small wind turbines, ground-mounted solar panels and micro-hydro in Landscape Overlay Zones. We do not favour more restrictive performance standards for roof-top solar panels in Landscape Overlay Zones.

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

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We support the use of technology-specific performance standards instead of MW thresholds. We think that the performance standards for wind farms are still on the restrictive side (Max 5 turbines at 85m height, or max 3 turbines at 125m height), given that technology is changing. While we do not anticipate anything bigger at present, it may be wise to increase the height limits to 125m and 165m respectively. To avoid confusion, it would be best to designate that the heights refer to hub height (if they do - preferable) or blade tip (if that is the case).

We support the changes to hydroelectric generation proposed here.

## *Large-scale renewable energy generation*

We agree that large- scale renewable energy generation should have non-complying status within Outstanding Natural Landscapes.

## *Energy resource investigation device*

We approve of the removal of resource consent requirement for meteorological masts and believe that temporary masts should also be permitted (subject to performance standards) in Residential etc zones, Recreation zones, and some Landscape Overlay Zones.

## *Activity statuses*

We approve the table of activity statuses as set out with the provision that some improvement could be made in applying a wider set of permissions for energy resource investigation devices.

## **Actions:**

We request that the Council:

1. Makes very explicit the desirability of REG.
2. Makes on-site energy generation easier to achieve even in landscape overlay zones.
3. Is slightly more permissive in regards to standards for small-scale REG and to be clear about which heights are being measured (hub height or blade tip, for wind turbines).
4. Rationalises the permissions for temporary meteorological towers in other zones as explained above.

## **2.3 Residential Zones**

We fully agree with the objectives clearly set out on the Q&A sheet for managing the residential environment. We also believe that the housing option of 'co-housing' as in the example of the Earthsong Eco-Neighbourhood' in Auckland should be provided for, in addition to small residential units, family flats and retirement villages, rest homes and supported living. Our work on Climate Change planning in Waitati has revealed that

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residents are already seeking solutions to housing and are anticipating a managed retreat and some would seek co-housing arrangements.

We believe that residential zones should be made up of warm cosy homes, with a range of sizes and types of dwellings, and attractive streetscapes.

We agree with the replacement of the current six residential zones with ten residential zones to better represent the diversity of residential reality and the opportunities and constraints therein. Additionally we support the application of 'Overlay Zones', in particular the "Hazard Overlay". We know that residents in Waitati want to be better informed about the Climate Change risk to their properties.

## **Actions:**

We request that the Council:

1. Encourage more supply of residential units in the form of 'Co-housing' as well as "Smaller residential units; Family Flats; and Retirement villages, resthomes and supported living". Please see attached 'medium density housing' document from Auckland, via Waitakere City Council.
2. Pay particular attention to detail around 'site layout' to boost the potential for good passive and active solar design.
3. Be proactive in developing the 'Hazards Overlay' showing conservatism rather than optimism – i.e. better to assume a worse outcome than to plan for the best scenario and be proven wrong.

## **2.4 Residential Activities - Performance Standards**

We agree with the goals for managing residential activity and we suggest two additional goals be added:

1. Enabling warm cosy homes
2. Providing accurate disclosure of known hazards.

We support the development of performance standards related to communal living spaces, particularly in relation to 'co-housing' developments.

We approve and support the new performance standard for permeable surfaces to 'soften' the urban and residential landscape, reduce the need for new infrastructure or infrastructural upgrades and ensure a greater proportion of green space.

We support a change allowing accessory buildings to be built closer to boundaries than is currently the case.

## **Actions:**

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We request that the Council:

1. Adopt two additional goals for managing residential activity as above (enabling warm cosy homes – this relates to good solar positioning and durability; and providing accurate disclosure of known hazards – this relates to good hazards overlay and up to date climate change science).
2. Include ‘co-housing’ as part of the range of residential options and plan accordingly.
3. Ensure a new standard for permeable surfaces and confirm the ‘accessory buildings’ change.

## **2.5 Rural Zones and Landscape Overlay**

We support the goals for managing the the rural environment with some additions. Firstly we believe the first goal should read: *“economically productive activities such as farming, forestry **and renewable electricity generation**”*.

Secondly we believe that it is worth being more explicit about “Strategic Direction Objective 2: Fuel Price Volatility”, notably “Dunedin is well-equipped to manage and adapt to any changes that may result from rising petroleum prices by having:

- increased local electricity generation;
- reduced reliance on private motor cars for transportation; and
- increased capacity for local food production.”

We approve the proposed Landscape Overlay Zones and value the inclusion of inner Blueskin Bay in the ‘Coastal Landscape’ zone. In particular, we congratulate the Council on an excellent rational review of Overlay Zones that provides serious improvement on the status quo.

We support the development of a new overlay “Outstanding Natural Features” and would be willing to comment on specific natural features we believe might qualify, i.e. those with significant cultural value, archaeological interest or unique bio-diversity in particular.

### **Actions:**

We request that the Council:

1. Include the example of renewable energy generation under the list of economically productive activities even although REG is considered seperately.
2. Confirm the changes to the Landscape Overlay Zones and inclusion of a new overlay ‘Outstanding Natural Features’.

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## 2.6 Rural Zones and Landscape Overlay Changes

We agree with the goals for managing residential activity in the rural environment.

We favour a “Management Plan Approach” involving a ‘whole of property assesment’ as set out in the discussion document. We value the acknowledgement of risk in this document and agree that negatives may be experienced as increased cost, increased administration and may increase subdivisions which *“result in more rural residential sites in the rural environment, which may undermine the strategic directions of the Plan”*. This latter risk is the one that concerns us the most among the risks of a “Management Plan Approach”. We believe such risk can be mitigated by ensuring that the Plan’s ‘strategic directions’ are up front and highlighted at every opportunity, with instruction for all to aim to work to support the ‘strategic directions’.

Furthermore, we value a “Management Plan Approach” as an additional way to build in good process for changing times and new residential options such as ‘co-housing’ and to have processes for instances of managed retreat from climate change ‘hot-spots’ to more suitable zones.

### **Actions:**

We request that the Council:

1. Adopts a “Management Plan Approach” to the management of residential activity in the rural environment, with safeguards as required to support the Plan’s strategic directions.

## 2.7 Natural Hazards

We agree in general with the goals for managing natural hazards, however we do believe that mention should be made of risk of natural hazards as being ‘dynamic risk’ in that often what are described as singular risks (sea level rise, flooding, storm surge, alluvial fans) combine dynamically to present significant risk to people and property.

We applaud the Council for being clear about the risk in climate change ‘hot-spots’, the largest of which is South Dunedin and we believe that a goal of ‘Managing any retreat from climate change hot-spots’ could be added, as residents (in Waitati at least) desire local government participation in confronting the challenge of maintaining residential activity in climate change hot-spot zones and any transition out of hot-spots into safer areas.

We also believe that this part of the 2GDP would ideally have an ability to adapt, as the situation changes. As NIWA scientist Andrew Tait said in a 2012 climate change planning

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workshop in Dunedin, “*we now no longer live in a world of stable climate and stable coastlines*” and none of us knows what that means or what it will bring.

Ideally, an analysis of natural hazards would also begin building different management scenarios that support the Plan’s strategic directions, which would assist any “Management Plan Approach” to the management of residential activity in the rural environment.

## **Actions:**

We request that the Council:

1. Be very explicit in the description of goals about singular events and situations presenting dynamic risk when combined.
2. Pay attention to the processes by which Hazards are assessed and updated.
3. Be clear that planning for managed retreat from climate change hot-spots if required is a Council role.

## **2.8 Natural Environment and Biodiversity**

We support the goals for managing the natural environment and biodiversity and we support the preferred option of green and blue corridors. We applaud the Council for its thorough work.

## **Actions:**

We request that the Council:

1. Confirm the preferred option of green and blue corridors.