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Name	Mike Sweeney
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Response Date	Jul 28 22
Notes	
Q1	Select the chapter you want to provide feedback on
Q2	In general, to what extent do you support the contents of this chapter?
Q3	Objective/Policy/Rule/Standard reference:
Q4	Feedback/Comments
Q5	Objective/Policy/Rule/Standard reference:
Q6	Feedback/Comments
Q7	Objective/Policy/Rule/Standard reference:
Q8	Feedback/Comments
Q9	Objective/Policy/Rule/Standard reference:
Q10	Feedback/Comments
Q11	supporting documents?
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Q12	If you need more space, or have any other general comments, please leave them here

## Mark Smith

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**From:** Friends of Oamaru Harbour <[REDACTED]>  
**Sent:** Thursday, 28 July 2022 12:46 PM  
**To:** Plan Review  
**Cc:** Gary Kircher; Melanie Tavendale; Colin Wollstein; Kelli Williams; gthomson@waitaki.govt.nz; Guy Percival; Jeremy Holding; Jim Hopkins; Bill Kingan; Hana Halalele  
**Subject:** height limits in district plan



**External Email** Be careful with links and attachments. Think before clicking – do I know this person and does this person's request make sense?

### ***Friends of Oamaru Harbour makes the following initial submission on the draft district plan:***

Council members should be advised that the government's National Policy Statement on Urban Development (NPSUD) doesn't require any change whatsoever in Waitaki's height limits.

Oamaru barely qualifies as a "tier 3" community because it narrowly exceeds a population of 10,000. Whereas a tier 3 community is required to enable some housing intensification, there are absolutely no provisions that dictate the quantity or type of intensification.

The only relevant section of the NPSUD is Policy 5:

**Policy 5:** Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:

- (a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or
- (b) relative demand for housing and business use in that location.

The existing height limit of 8 metres is "commensurate" with intensification in the form of attached townhouses or terraced housing. This is the most common and most desirable style of intensification. It is cheaper to build. It is more attractive to tenants. It avoids the serious harm to views, sunlight, and amenity that result from high-rise apartments of 3 or more storeys.

The NPSUD was promulgated to force major "tier 1" cities like Auckland, Wellington, Hamilton and Christchurch to allow 6-storey apartments where public transportation is available. That's the government's priority. Abusing a small community like Oamaru isn't government's intention, especially a community that lacks any public transportation.

Oamaru can benefit from more low-cost multi-family housing, but it can and should be enabled in an appropriate way that doesn't harm existing neighbourhoods or the general amenity.

Nevertheless, the draft district plan appears to be written from the ideological perspective of big-city consultants who seek as much intensification as possible, ignoring the costs.

The draft district plan destroys the existing 8 metre height limit in several places.

- 1. The medium density zone allows 12 metre *single-family* houses as a *permitted right*—exempt from any discretionary approval by planners.**

This would be a serious mistake that would allow demolition of existing houses in desirable places like South Hill to be replaced with three-storey mini-mansions that block the views and sunlight of neighbours. It would do nothing for intensification, which is the supposed justification for the introduction of medium-density zoning.

**2. The medium density zone allows 12 metre or higher multi-family structures subject only to restricted discretionary approval.**

As noted, an appropriate level of intensification can be achieved within the existing 8 metre height limit. As a restricted discretionary matter, the draft plan would allow apartments that *equal or exceed* 12 metres if planners could be “sold” by a developer to grant restricted discretionary approval due to the alleged lack of significant impacts on the surrounding neighbourhood. It is questionable whether concerned neighbours would even be notified prior to issuance of planners’ approval.

The “restricted discretionary” standard doesn’t provide meaningful protection for the community. It puts the decision on whether an apartment building should be allowed, at whatever height, up to the whim of future planners, operating without oversight from the Council.

The threat of high-rise construction is even more severe due to government’s recent prohibition against the requirement of on-site car parking in any new development. An irresponsible developer could take advantage of this rule, thereby putting tenants’ cars onto the curbside, whether or not there is room for them. This is a clear and present threat to quality of life in Oamaru.

**3. Heights of 12 metres or more are allowed in the General Residential zone with restricted discretionary approval.**

Presently, the district plan limits heights to 8 metres in Residential, with no way for a developer to evade this limit without going through the entire resource consent procedure for a non-complying use. The draft plan would destroy this protection. In the draft plan’s General Residential, *multi-family* construction of any height is allowed with restricted discretionary approval. Again, the whim of a future planning department shouldn’t be sufficient to enable this drastic elimination of community protections.

The draft district plan should be revised to uphold the 8 metre height limit throughout the medium density and general residential zones. Any violation of 8 metres should make a project *non-complying*, not restricted discretionary. The Council members and the public should have full awareness and opportunity to oppose each and every attempt to exceed 8 metres.

It may be argued that “holding the line” on 8 metres would interfere with the Council’s obligation to allow “sufficient” intensification to meet projected demand. But projected demand for multi-family is absolutely unknown, and Council can easily provide credible projections that show that demand can be met with 8-metre attached housing.

And if multi-family is truly seen as an urgent priority, the district plan should designate some of the new greenfield areas for “planned unit” rezoning, available only for multi-family projects subject to detailed Council approval.

Respectfully submitted,

Friends of Oamaru Harbour

By: Mike Sweeney

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