Response ID ANON-URZ4-5FN6-M Submitted to Fast-track approval applications Submitted on 2024-05-03 19:37:50 Submitter details Is this application for section 2a or 2b? 2A 1 Submitter name Individual or organisation name: Summerset Villages (Mosgiel) Limited 2 Contact person Contact person name: s 9(2)(a) 3 What is your job title Job title: s 9(2)(a) 4 What is your contact email address? Email: s 9(2)(a) 5 What is your phone number? Phone number: s 9(2)(a) 6 What is your postal address? Postal address: s 9(2)(a) 7 Is your address for service different from your postal address? Yes Organisation: Russell McVeagh Contact person: s 9(2)(a) Phone number: s 9(2)(a) Email address:

s 9(2)(a)

Job title:

s 9(2)(a)

Please enter your service address:

Vero Centre, 48 Shortland Street, Auckland 1140

Section 1: Project location

Site address or location

Add the address or describe the location:

Village: 51 Wingatui Road (Lot 3 DP 343526), 47 Wingatui Road (Lot 1 DP 343526), DCC Endowment parcels (Pt Sec 2 Blk II East Taieri SD and Pt Sec 3 Blk II East Taieri SD)

Access to Owhiro Drive: 21 Owhiro Drive, 67 Gladstone Road North

Land at the site bounded by 51 and 47 Wingatui Road, 21 Owhiro Drive and 67 Gladstone Road North and two endowment parcels owned by the Dunedin City Council located between Mosgiel and Wingatui.

File upload:

Site.pdf was uploaded

Upload file here:

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Do you have a current copy of the relevant Record(s) of Title?

Yes

upload file:

Certificates of title.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

The Applicant, Summerset Villages (Mosgiel) Limited owns the land at the site bounded by 51 and 47 Wingatui Road, 21 Owhiro Drive and 67 Gladstone Road North located between Mosgiel and Wingatui.

Dunedin City Council owns endowment land to the south and west of the site which is proposed to be used for road access to the site (but not required). Summerset and Dunedin City Council will be entering an agreement for this land to be utilised for village access.

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

See answer above.

Section 2: Project details

What is the project name?

Please write your answer here: Summerset Retirement Village - Mosgiel

What is the project summary?

Please write your answer here:

The project is for the construction and operation of a new comprehensive care retirement village on approximately 17ha of land in Mosgiel, Dunedin at the site bounded by 51 and 47 Wingatui Road, 21 Owhiro Drive and 67 Gladstone Road North and Pt Sec 2 Blk II East Taieri SD and Pt Sec 3 Blk II East Taieri SD located between Mosgiel and Wingatui.

What are the project details?

Please write your answer here:

The purpose of the project is to deliver critical retirement and aged care housing for the Otago Region, which suffers a serious lack of aged care housing supply for an ageing population.

The proposed retirement village comprises approximately 17ha of land and will comprise:

- 1. approximately 260 independent Living Units (cottages, villas and Louisville and Over / Under townhouses) in various configurations.
- 2. A central main building comprising approximately 20 Assisted Living Suites, 20 memory care suites, 10 care suites beds, 20 serviced apartments, and associated staff and administrative functions;
- 3. a range of resident amenities such as a bowling green, café, restaurant, swimming pool, library, recreation centre, cinema and residents shop;
- 4. internal circulation and parking provision (approximately 100 spaces proposed); and
- 5. extensive site landscaping.

No subdivision or unit titles will be created as part of the Fast-track consent for this Project

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

As a result of the size of the Project, the construction of the retirement village will be undertaken in stages. Access to the Site for construction and for residents, staff and visitors during the staging of the Project will be predominantly via Hagart-Alexander Drive and a small volume of movements via Owhiro Avenue for residents with construction traffic management measures put in place to facilitate this. The staged construction of the retirement village also means that some temporary activities are proposed during various phases. These include:

- 1. a temporary recreation centre and associated car parking spaces;
- 2. a show villa;
- 3. lay down areas for plant and equipment
- 4. a temporary operations office; and
- 5. a temporary sales office.

Initial works will include an enabling works package, including a main access driveway from Hagart-Alexander Drive, vegetation clearance and, the construction of an approximately 42m long bridge as well as further detailed geotechnical and environmental (contamination) investigations. This will be done utilising accidental discovery protocols. The bulk earthworks and civil construction is expected to begin in 2025. Initial programmes indicate bulk earthworks and civils, including the bridge, to enable the Site's development, would be undertaken over an 18 month period. The entire project is forecast to be undertaken during a 5 – 7 year period. The Main building VCA (communal area comprising amenity such as bar, care, lounges etc) is intended to be complete for occupation of our first dwellings. The remainder of the main building comprising memory care, serviced apartments and care beds/suites (hospital level care) will be delivered thereafter, by Stage 3.

Summerset has significant experience in projects of this nature and has financing in place to fund the Project to completion (addressed further below). As such, no delays are expected to occur between any stages of construction, and completion of the Project as soon as possible will be Summerset's priority.

The site is currently zoned Residential Transition Zone as directed by Environment Court Decision No. [2022] NZEnvC 207. The work to release the land (in consultation with Dunedin City Council and Otago Regional Council) is well progressed and we anticipate the land being released as General Residential 1 Zone.

Summerset will ensure (and will be required to demonstrate) that this will be in place prior to the development occurring under this consent, Summerset will be in a position to rapidly lodge a consent application on the project being listed, and should consent be obtained, to implement that consent within a short time period following consent being granted.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Summerset seeks resource consents under the Resource Management Act 1991, Wildlife permits under the Wildlife Act 1953, and an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014.

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Otago Regional Council and Dunedin City Council

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

No application for resource consent has been made by Summerset to Otago Regional Council or Dunedin City Council for the same or similar project.

Application for a Wildlife permit under the Wildlife Act 1953 was lodged in March 2024 but is yet to be concerned.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

No approval is required from any other parties to develop the Site.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

Summerset directly manages all of its retirement village construction in-house (Summerset is the head contractor with directly employed project management personnel). This gives Summerset a high degree of control over the construction process including quality and the careful management of

temporary construction effects. Summerset expects construction works to commence within a month of the date of receiving consent, with the project developed in a staged manner over 5-7 years from commencement. Pre-construction planning is conducted at the early stages of preliminary design and refined through the consent process with technical input. Management plans required are prepared in advance so that they will be ready to lodge with the relevant authorities should consent be granted.

s 9(2)(b)(ii)

Summerset seeks to proceed with the Project as soon as possible, however there are a number of constraints that may have an impact on the timing of the project:

- 1. Summerset can undertake earthworks at any time of the year, but summer periods are preferable for earthworks. The fast-track process will enable earthworks to utilise the summer period of 2024-2025, subject to the timing of a decision from the Consenting Panel. It is unlikely that consent would be obtained under the RMA prior to the summer period of 2024-2025.
- 2. The availability of contractors. Contractors may not be available to begin work on the Project at the time consent is obtained under the RMA. This may in turn affect Summerset's ability to use locally sourced contractors.
- 3. The availability and cost of materials. Record demand for construction materials and disruption to supply chains have led to rapid increases in the costs of materials, and many materials becoming unavailable. The sooner consent can be obtained for the project, the sooner Summerset can secure the relevant materials and provide certainty to its suppliers. Both Summerset's costings for the Project and the pricing of contractor tenders will be affected by increases in material costs. Materials may become unavailable from suppliers that could also lead to significant changes to design being required, with further cost. Having said that as Summerset typically builds 500-700 units per year across New Zealand, its procurement processes are dynamic and robust which helps mitigate cost increases or shortages should they occur.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

The persons likely to be affected are as follows:

- 1. Local authorities: Otago Regional Council and Dunedin City Council
- 2. Relevant iwi authorities: Te Rūnanga o Ngāi Tahu, particularly in the areaNgai Tahu Papatipu Runanga: Te Rūnanga o Ōtākou, Te Rūnanga o Waihao, Te Rūnanga o Moeraki, Hokonui Rūnanga and Kati Huirapa Runaka ki Puketeraki
- 3. Treaty settlement entities: Te Runanga o Ngāi Tahu
- 4. Adjacent landowners

No customary marine title groups or applicant groups under the Marine and Coastal (Takutai Moana) Act 2011 will be affected as the project is not located in or near the Marine and Coastal Area.

No land will be acquired under the Public Works Act 1981.

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Summerset has been in consultation with Aukaha, a mana whenua owned consultancy representing the local iwi authorities as listed above.

Consultation will be ongoing through the development of the resource consent application, with relevant iwi authorities then having opportunity to provide comments on the substantive application, and any proposed conditions.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

Not applicable.

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

Ngãi Tahu identifies the whole of the South Island as an area of interest which includes the site. The site does not however comprise any land returned under the Ngãi Tahu Treaty Settlement nor does it sit within any statutory acknowledgement areas. The Ngãi Tahu Settlement Act 1998 ensures that Ngãi Tahu's interests are incorporated into resource management issues, particularly, statutory acknowledgements have to be included in council plans, but these do not affect the site.

Are there any Ngã Rohe Moana o Ngã Hapû o Ngãti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Mãori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

No applicable.

Is the project proposed on any land returned under a Treaty settlement or any identified Mãori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

No

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

Nc

If yes, please explain:

Upload your assessment if necessary: No file uploaded

Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

The effects of the project have been extensively assessed and can be appropriately managed. Summerset is confident that all effects can be appropriately managed through the inherent design and layout of the project, its operational attributes, and suitable conditions of consent, and that, if listed, the input of parties through the substantive consent process will enable the Expert Panel to make a fully informed decision on the project.

The key effects relate to those associated with:

- 1. The bulk and location of the proposed buildings and their amenity effects in respect of dominance, overlooking, shading, loss of privacy, and the character of neighbouring residentially zoned land. The design of the village has been developed in a way that appropriately responds to surrounding context, respecting the more rural character of the surrounding area through extensive planting, while acknowledging the zoning anticipates comprehensive urban development of the site;
- 2. The temporary construction effects (noise, vibration, dust, ground settlement, silt & sediment control, and construction traffic) will be managed through standard, good practice construction management methods, such as including restrictions on construction vehicle movements, construction noise limits, and erosion and sediment control techniques;
- 3. The capacity of the network utility infrastructure, and implications on flooding and overland flow. These matters will be carefully managed through village design, including standard, good practice stormwater engineering and three waters servicing, to ensure stormwater is managed to pre-development levels, infrastructure is resilient to climate change, and any additional pressure on public infrastructure network capacity is appropriate (and if not, the necessary upgrades are able to be provided to support the project);

- 4. The ecology of the Site (for example, adverse effects on the lizard populations) will be managed through a comprehensive conditions package, including lizard surveying and management plans (and the same for any other ecological values identified);
- 5. The operational effects of the retirement village activity (for example, traffic) will be managed through standard, good practice traffic engineering assessment, with roading upgrades where required to provide the capacity to support traffic movements on the relevant roading network from the village; and
- 6. Freshwater effects on wetlands located within the site, and on the construction of the bridge over Owhiro Stream.

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Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

The National Policy Statements and National Environmental Standards that are relevant to this project are the:

- 1. National Policy Statement for freshwater management (NPS-FM) and National Environmental Standards for Freshwater (NES-F)
 Freshwater features, including a number of low value wetland features and the Owhiro stream have been carefully considered in the design of the project and consent is required under the NES-F. These features will be carefully managed in accordance with the NPS-FM effects management hierarchy and, in the case of the wetland features, the NPS-FM offsetting principles to ensure no net loss of natural wetland extent is achieved. While there is a consenting pathway under the NES-F it is anticipated to add considerable complexity, delay and cost to secure consent with the Otago Regional Council indicating it would notify Forest and Bird. The fast-track pathway is therefore appropriate to address the matters.
- 2. National Policy Statement on Urban development (NPS-UD)

The Dunedin City Council is a Tier 2 local authority for the purposes of the NPS-UD. The future development of the Site for a retirement village will strongly align with the direction in the NPS-UD, providing much needed housing supply in an area identified for future development. With a growing elderly population in Dunedin, it will materially contribute to the social and economic well-being of the Mosgiel community and wider Otago region through the provision of a variety of housing typologies.

3. National Policy Statement on Indigenous Biodiversity

The site is not located within or near a significant natural area. No significant adverse effects on indigenous biodiversity are anticipated with the project. As part of site due diligence, Summerset's ecologists have identified lizards on the site through lizard surveys and Summerset's ecologist has prepared draft lizard management plans to ensure any adverse effects on lizard populations are carefully managed through construction and operation of the village. All adverse effects on indigenous biodiversity as a result of the project will be required to be managed through the NPS-IB effects management hierarchy. In addition, such impacts will also need to be carefully managed as part of the wildlife permit approval process under the Wildlife Act.

4. National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS)

A Preliminary Site Investigation has been undertaken to confirm the nature and extent of any contamination that must be managed as a result of earthworks. Resource consent will be required under the NES-CS. However, only area of HAIL activity on the site was on the corner of Lot 3 DP 343526 which is isolated from the majority of the site by Hagart- Alexander Drive. This was HAIL0.008001 class activity persistent pesticide bulk storage or use. No work has been proposed on that part of the site however so it is not anticipated that this will cause any issues in securing consent.

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Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

The fast-track process offers a number of advantages in terms of time over the standard RMA process. Public and limited notification is precluded under the Fast-track Approvals Bill. The panel is only permitted to invite comments from specified persons and a short timeframe is provided for comment. In the case of the project, it is Summerset's view that few parties are affected by the project in a more than minor way, based on the anticipated effects outlined in section 5 and how they will be managed.

The process under the Fast Track Approvals Bill for providing comment at the Expert Panel Stage is appropriate and adequate to address concerns of the project.

While Summerset is confident that the effects of the Project can be appropriately managed through the design of the village, and standard, good practice conditions of consent. There is a real risk of public notification, or at least limited notification being triggered because of the scale of the project the Regional Council's indicative approach to notification for consents required under the NES-F. Notification of the Project would result in significant delays

and increases the likelihood of an Environment Court appeal. Adjacent landowners and other stakeholders will have opportunity to provide comment on the design of the village and consent conditions through the Fast Track Approvals Bill process, which is more sufficient for addressing any concerns while providing considerable time savings.

Given the significant hurdle that the requirement of consents under the NES-F for alteration of the low-value wetland on the site poses, fast-track approval is appropriate. The requirements in the NES-F are not commensurate with the low value these wetlands present. These wetlands need to be considered in light of the fact that their alteration will lead to ecological enhancement and key stormwater management options. The use of the fast-track process will help expedite the required consents. This is in line with the purpose of the Fast-track Approvals Bill as it will facilitate reasonable development and will not unreasonably hold up the development in an area identified for urban development, of low ecological value where the existing consenting process would. Under the normal consenting process, the NES-F requirements introduce significant delay and increase of development costs and complexity while there is a clear development consent pathway.

The two-stage RMA process would create a much longer consenting timeframe for the Project and the risk of delay from a subsequent Environment Court Appeal would be likely avoided under the Fast Track Approvals Bill. Summerset's recent experience has been that retirement village proposals that go through the Environment Court process (whether by appeal or direct referral) can take at least two years to obtain consent. The approximately six-month timeline under the Fast Track Approvals Bill reflects a significant saving by comparison.

Summerset has had significant experience in seeking consent for retirement villages through both the COVID19 Recovery (Fast-track Consenting) Act 2020 and the fast-track consenting process under the Natural and Built Environment Act 2023. The use of these fast-track processes has afforded Summerset the ability to deliver critical retirement care villages in a market where the is a high demand and urgent need for aged care facilities. Under the standard RMA processes rolling out these villages has taken upwards of 9 years for consenting and construction to complete while pressures on existing villages have significantly increased. Summerset's experience with fast-track consenting is that it is the most efficient way to consent retirement villages which are complex developments with many different activities. This is beneficial to delivering care to more elderly people across New Zealand.

The Fast Track Approvals Bill also provides significant advantages in streamlining the approval processes by bundling the processing of RMA consents and permissions needed under other frameworks. This includes processing RMA consents together archaeological authorities and wildlife permits, both of which are anticipated to be required for this project. Processing the consents, authorities and permits together prevents the approvals process for the Project from becoming disjointed. In Summerset's experience the traditional disjointed separate system significantly delays works due to the different timeframes for consents and permits being granted. This fast-track framework is therefore clearly fit for purpose for the project given how it materially progresses consents permits and authorities with delivery at pace.

The Fast Track Approvals Bill will provide a greater certainty of the timing of consent than a standard RMA process once this progresses to an Environment Court appeal. This certainty enables Summerset to ensure that the Project remains "shovel ready" in all respects, to progress the works quickly and avoid compounding delays.

Summerset will be ready to commence works within one month of receiving consent.

Practically, a delayed timeframe under the standard RMA process is likely to exacerbate delays and lead to significant impacts on how the Project can progress at speed including:

- 1. Seasonal constraints mean that the summer of 2024-2025 is preferable to begin earthworks as there may be difficulties beginning this in winter. The RMA process would likely extend the timeframes for beginning earthwork into winter causing delays to construction.
- 2. Contractor availability and supply chain constraints: contractors and building supplies will be limited seasonally so if the RMA consent process was only completed in the winter and a summer window was preferable.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

Given Summerset is in a position to lodge a substantive application as soon as possible, it can immediately benefit from being a 2A listed project. If this project is not listed, referral will be sought to utilise the Fast Track Approvals Bill given the clear and substantial benefits this fast-track process will provide to its delivery. On that basis, by listing this project under 2A substantially streamlines processing of this application for both the Ministry for the Environment staff, and the joint Ministers, allowing an Expert Panel to begin processing the application as soon as it is appointed.

Has the project been identified as a priority project in a:

Local government plan or strategy

Please explain your answer here:

The Site on which the project will be located has been identified as a New Development Mapped Area with a Residential Transition Overlay Zone in the new Dunedin City Council 2GP Plan. This is meant to promote urban development in the wider Dunedin area including the construction of more retirement villages.

The Draft Dunedin Future Development Strategy 2024 – 2054 intended to replace the current Dunedin Spatial Plan supports easier consenting pathways for retirement villages in order to encourage development in this sector. Included as part of this is acknowledgement of Summerset's intention to construct a retirement village on the site which is currently identified with a Residential Transition Overlay Zone.

Will the project deliver regionally or nationally significant infrastructure?

Not Answered

Please explain your answer here:

Not Applicable.

Will the project:

increase the supply of housing, address housing needs, contribute to a well-functioning urban environment

Please explain your answer here:

The construction of affordable retirement village accommodation such as those options provided for in the proposed village, would reduce land demand pressure and make further residential housing available as new village residents release their properties to the market, to be more efficiently used by families. The village will increase choice for the elderly sector of the wider Otago community and help reduce senior housing demand pressures which is becoming evident based on the growing waitlist for the existing Summerset Dunedin Village, Bishops Court. There has been a significant increase in demand for retirement housing in Mosgiel from both elderly people in Dunedin and the Otago region as they gravitate towards Dunedin to due to the need for proximity to good healthcare. Mosgiel is an area that is particularly in demand for elderly housing given its flat landscape. The project will in turn make further residential housing available as more seniors will move into the Village freeing up larger housing stock for younger families increasing the availability of housing in the area.

The retirement village will include hospital level care. With access to hospital care on site there will be a reduction in the demand on Dunedin Hospital by the elderly who are resident as Summerset Mosgiel. This will reduce pressures on the Dunedin Hospital resources which are currently significantly strained supporting a well-functioning urban environment.

The project is to be located within a large vacant site which is zoned for new development. The integrated residential development activity (retirement village) is an appropriate and anticipated use of the land and represents an efficient use of a large site in a manner which will contribute to an increase in the provision of housing capacity, intensity, variety and choice for the elderly as well as the wider district and Otago region. Such an activity and intensity of development will enhance and support the social and economic well-being of the community.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The economic benefits of these types of projects (both during construction and once operation) have been consistently recognised through a number of fast track applications under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Economic benefits during construction

Construction has historically been a major driver for growth within New Zealand, directly employing about 308,500 people in residential, heavy and civil construction, and constructions services.

The project represents a \$220 million investment in the local area providing jobs and significant flow on economic benefits to the local community through the construction phase. Of that investment 88% is expected to remain within the region, with the remaining 12% being spent within the wider New Zealand economy. For every dollar spent by Summerset on construction, 40% is spent on salaries to local employees and on local supplies. This will provide jobs and significant flow-on economic benefits to the local community.

There will be direct benefits for construction workers and project managers, architects, engineers and health and safety consulting service providers. The project will have the direct employment impact of 800 FTE jobs in the construction and services sector over the estimated 5-year construction period. There will also be associated financial and development contributions for local councils as part of the development.

Indirect benefits include supplies and services purchased by Summerset's construction team, or by contractors engaged by Summerset. These include wholesale and retail building supplies, and legal, telecommunications, administrative and accounting services. The vast majority of Summerset's contractors and materials are locally sourced, ensuring that the benefits remain within the local economy. Other professional services, such as real estate and conveyancing services are expected to benefit as housing is released into the market.

Economic benefits during operation

Around 65% of the staff employed for operation of the retirement village are caregivers and housekeepers. The village will also employ other qualified professionals such as registered nurses, a village manager, property managers and diversional therapists. The project operations include wider roles in staffing the resident amenities which will provide opportunities for those in the hospitality sector. Once the village is operational it will create approximately 50 full FTE local jobs for internal hospitality services, maintenance, management, caregiving and housekeeping.

The project would also be cost effective in relation to Council and public services, as the provision of on-site amenities reduces pressure on these services within the local community. Further, capital expenditure and maintenance costs for infrastructure (such as drains and vehicle accessways) within the Site would be borne by Summerset. Rates would also be charged on the retirement village as a whole. This reduces both administrative and capital costs for the Council.

Caring for vulnerable people such as parents, grandparents, family or friends can often place a financial, time and emotional burden on carers, especially

when this is a full-time responsibility. This burden often falls on a working aged generation and many carers both need to and want to work, but are unable to due to this responsibility. The retirement village would enable carers to return to the workforce which may ease the financial situation of the carer while contributing to the local economy.

Will the project support primary industries, including aquaculture?

Nο

Please explain your answer here:

Will the project support development of natural resources, including minerals and petroleum?

Nο

Please explain your answer here:

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

In 2018 Summerset became the first retirement village operator in New Zealand to achieve Certified Emissions Measurement and Reduction Scheme (CEMARS) certification. This provides third party certification to ensure accurate and consistent carbon measurement, reduction and neutrality claims. Summerset is also New Zealand's first retirement village operator to be Toitū carbonzeroTM certified. Summerset has offset all unavoidable emissions, setting a target in 2018 to reduce operational emissions intensity by 5% by 2022. Summerset has exceeded this target as a result of conscious changes made to reduce GHG emissions, including through reducing waste and energy use, and developing efficient transport options. Summerset is one of the few companies in New Zealand to set public waste diversion targets for construction waste and implements onsite or offsite separation of waste material that has enabled the diversion of 25-75% of waste to landfill across construction sites. This contributes to the reduction in emissions to landfill and the costs associated with landfill disposal. To further improve waste minimisation, Summerset continues to collaborate with waste contractors, including a new national supplied for waste and recycling removal, with a supplier code of conduct for sustainable procurement.

There are also efficiencies through the project due to the self-contained nature of the development that provides amenities onsite and reduces the need for residents to travel. Through the provision of extensive on-site amenities, services and recreation opportunities, communal transport for residents and provision for cycle parking and end of trip facilities, residents of the village will have a lower need for vehicle use (and the associated carbon emissions) compared with more standard residential development. Traffic movements are also more likely to be generated during off-peak travel times, and so do not materially contribute to effects on the transport network.

Like all Summerset villages, the village will utilise the same shuttle bus service for its residents for trips outside of the village. While these services are already highly efficient in terms of transport emissions, Summerset is also in the process of rolling out electric shuttle bus services to reduce these emissions further.

More generally Summerset is a market leader in sustainable practice and accountability, being a member of the Climate Leaders Coalition and New Zealand Green Building Council. Through membership of the Climate Leaders Coalition Summerset has set a science-aligned reduction target to reduce emissions by 62% per square meter by 2032 from the baseline year (2017), providing an ambitious target to work towards.

The project will also not be affected by natural hazards resulting from climate change, being a stormwater neutral development. Stormwater design will assist in both treating upstream stormwater discharges, and strengthening resilience downstream on the Taieri flood plain through the various stormwater management upgrades to the site.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

The project would help to increase the social resilience of its residents in the event of a natural disaster by looking after the residents that are likely to otherwise be vulnerable if living on their own. For example, in relation to stormwater management and flooding risks, freeboard is provided in accordance with the NZ Building Code, owing to accessibility requirements for older residents. Further, if the home of a resident is destroyed by a disaster and it cannot be rebuilt on the original site or in reasonable vicinity, they will receive the full market value of their home. Summerset also provides emergency water and power generation on site to ensure resilience for its residents through natural hazard events.

The engineering standards of the village will account for stormwater modelling for a 1:200 year event with 8.5RCP climate change factor.

In addition to managing natural hazard impacts through high quality village design, Summerset operates a comprehensive emergency response programme for its villages, recognising the heightened vulnerability that elderly residents have to such hazards. This was called to action for its villages in Auckland and Napier/Hasting in 2023 during the Auckland floods and Cyclone Gabrielle in 2023, during which we were able to keep our villages operational, and residents safe. Villages are also equipped with emergency power generators, to enable critical services to continue to operate for residents where power supplies become compromised.

Will the project address significant environmental issues?

NI	\sim

Please explain your answer here:

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

The project is consistent with both the new 2GP Dunedin District Plan and the Draft Future Development Strategy for Dunedin.

It is supported and identified in the Future Development Strategy which was created by both the Dunedin City Council and the Otago Regional Council in collaboration with Manu Whenua. Summerset has undertaken consultation with both councils and is actively working on the release of the land from transitional zoning which is a process that is well-advanced.

In the 2GP Dunedin District plan the site has been identified as suitable for residential development once existing infrastructure limitations have been met, which Summerset will demonstrate as part of the live zoning of the site.

Anything else?

Please write your answer here:

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

Refer to answer above regarding adaptation, resilience, and recovery from natural hazards.

The project will be highly resilient to natural hazards but will instead result in a stormwater neutral development to avoid downstream impacts on the Taieri flood plain and will enable community to grow in a hazard free location.

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

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Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

s 9(2)(b)(ii)

Important notes