

**Respondent No:** 10**Login:** Anonymous**Email:** n/a**Responded At:** Feb 13, 2026 14:32:00 pm**Last Seen:** Feb 13, 2026 14:32:00 pm**IP Address:** n/a

Q1. Full Name	Marcus Roy
Q2. Organisation	Environment Southland
Q3. Contact Person (if different from above)	Marcus Roy
Q4. Email Address	marcus.roy@es.govt.nz
Q5. Postal Address	Private bag 90116
Q6. Telephone Number	032115115
Q7. Could you gain an advantage in trade competition through this submission?	No
Q8. If you have selected Yes, please answer the question below: Are you directly affected by an effect of the subject matter that,a) adversely affect the environment; andb) does not relate to trade competition or the effects of trade competition.	not answered
Q9. The specific provisions of the proposal that my submission relates to are as follows:	
see attached document	
Q10. I support/oppose these provisions:(include whether you support or oppose in full or in part)	
Environment Southland: a. Supports the intent to provide for addition urban development and high-quality urban design through PC2 b. Supports the effective use of existing reticulated and transport infrastructure c. Opposes some of the proposed areas for rezoning. Changes are requested to remove areas between Tay and Tweed Street from PC2 as they are identified as potentially floodable by the Otepunui Creek d. Supports measures to mitigate natural hazards	
Q11. The reason(s) for my submission are:(state in summary your reasons, and whether you seek any amendments)	
see attached document	
Q12. I seek the following decision from the Invercargill City Council: (give precise details)	
see attached document	
Q13. I wish to be heard in support of my submission	Yes
Q14. If others make a similar submission, I would be prepared to consider presenting a joint case with them at any hearing.	Yes

Our reference: A1421531

13 February 2026

The Chief Executive
Invercargill City Council
Via Email



Environment Southland's submission on the ICC District Plan Change 2.

1. Thank you for the opportunity to submit on the Invercargill City Council Plan Change 2: Housing and Code of Practice (PC2). Environment Southland has reviewed the documentation and is making a submission which aligns with the direction outlined in the Southland Regional Policy Statement 2017 (SRPS).
2. Environment Southland recognises that Invercargill City Council (ICC) is preparing a plan change to address the city's housing needs by utilising existing zoned land to accommodate future growth. This includes smaller medium density housing within a 1.5-kilometre radius of the CBD.

Executive Summary

3. Environment Southland largely supports PC2 which will allow for urban intensification and redevelopment within close proximity of the CBD.
4. This submission also makes recommendations on the following key themes:
 - a. Supports the intent to provide for addition urban development and high-quality urban design through PC2
 - b. Supports the effective use of existing reticulated and transport infrastructure
 - c. Opposes some of the proposed areas for rezoning. Changes are requested to remove areas between Tay and Tweed Street from PC2 as they are identified as potentially floodable by the Otepunui Creek
 - d. Supports measures to mitigate natural hazards

Enhance urban development and design

5. The purpose of the Plan Change is to enable greater density and diversity of housing choices in Invercargill, and to update the District Plan to delete references to the expired 2016/1 Code of Practice for Land Development and Subdivision Infrastructure and replace with general reference to Council's Code of Practice for Subdivision, Land Use, and Development (COP).
6. Environment Southland supports enabling greater density and diversity of housing; and good quality urban design outcomes as it aligns with the objectives, policies and Invercargill City Council's responsibilities in the Urban Chapter of the SPRS. Specifically, Objectives URB.1, along with Policies URB.2, 3, 4, and 6.

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7. Issue URB.3 of the SRPS states that “Urban areas in Southland which develop in ways that do not recognise the principles of high-quality urban design are likely to be less cohesive, can experience reduced amenity and cultural values and can fail to provide for a range of transportation modes.” Terminology used in the PC2 replaces “high-quality” with “good” urban design for RES 1 and 1A Zones. Furthermore, Policy URB.4 of the SRPS encourages “high quality design”. =
8. Encouraging urban intensification and compact urban form will support improved social and health outcomes as more residential dwellings will be in close proximity to public parks, services, and city centres. This will also reduce travel distances for those working within the CBD and would encourage efficient public and active transport plans.
9. Considering parking needs alongside an emphasis on active and public transport is important for accommodating greater urban intensification, as it aligns with Objective URB.1 of the SRPS. This objective seeks to establish high-quality urban environments that enhance the quality of life of residents and promotes live-work-play opportunities. Providing reliable access to the CBD and surrounding areas for those who need to reach the city’s hub for leisure, medical, and support systems is important. Air quality and long-term capacity of roading infrastructure in intensified areas needs to be considered in planning.
10. Environment Southland supports the actions, rules and policies of the PC2 to enhance efficient energy usage, by designating access to acceptable levels of daylight and sunlight in outdoor spaces and habitable spaces.
11. Energy efficiency improvements can reduce household energy costs and reduce greenhouse gas emissions. Co-benefits of efficient natural energy use include improved health in insulated homes, and increased comfort.

Recommendations

- ***Promote high quality urban design. Remove inconsistencies in the wording of “good” urban design applying to RES 1 and 1A zones.***
- ***Encourage appropriate site and building orientation that supports energy efficiency and solar energy gain.***

Capitalise on Infrastructure & Transport

12. Enabling growth and redevelopment in areas with existing infrastructure capacity provides enhanced opportunities for diverse housing typology and effective utilisation of the piped network. Additionally, urban intensification could offset some of the housing growth into greenfield areas and rural environments, and subsequent extensions to infrastructure. Policy URB.3 in the SRPS supports the ‘intensification within preexisting areas’ and directly applies to PC2.
13. Environment Southland supports the reference to the Code of Practice for Subdivision, Land Use, and Development to replace reference to the expired ICC 2016/1 Bylaw.

14. Environment Southland supports urban development that encourages active transport modes such as walking and cycling, reducing the need for vehicular travel and its associated adverse effects. This aligns with Policy TRAN.4 in the SRPS which supports the management of transport activities to avoid, remedy or mitigate adverse effects on public health and the environment.

Recommendations

- ***That ICC enable housing growth to utilise the latent capacity within existing reticulated infrastructure***
- ***Support active transport modes with accessible links between housing and services.***

Recognise and mitigate natural hazards

15. Environment Southland is conscious that there are areas proposed for housing intensification within PC2 (particularly between Tay and Tweed Streets) that are within the potentially floodable area of the Otepunui Creek. Environment Southland opposes any intensification in potentially floodable areas as it is contrary to Policies NH.3, NH.4, NH.5 and NH.6 of the SRPS which requires a precautionary approach, avoiding significant risk and mitigating natural hazard effects.
16. PC2 recognises that increased urban density may contribute to environmental effects relating to stormwater runoff, which can impact the capacity of infrastructure networks if exceeded.
17. Environment Southland supports the objectives and relevant rules of the PC2 to have on all sites in residential zones permeable surface to be at a minimum 30 percent of the surfaces. The provisions ensure that effects relating to stormwater runoff can be adequately considered where permeable surfaces requirements are breached.
18. Environment Southland supports this precautionary approach to manage the effects of climate change in residential development. By 2040, Southland annual rainfall is projected to increase by 0-5 percent, and by 2090 most of the region is projected to experience a 5-10 percent increase in rainfall. Some guidance on future climate change expectation for Southland is available at:
<https://niwa.co.nz/sites/default/files/Southland%20climate%20change%20report%202018.pdf>

Recommendations

- ***Oppose the proposed changes to properties between Tay and Tweed Streets from PC2 due to these properties being within a potentially floodable area from the Otepunui Creek. Intensification of residential dwellings should not occur within an identified natural hazard location as it is contrary to the SRPS.***
- ***Retain provisions in PC2 to reduce the impacts of natural hazards in our changing climate, particularly requiring permeable surfaces and mitigating***

- *Clearly communicate the indicative nature of natural hazard information and the circumstances in which site-specific assessment may be required.*

Environment Southland again thanks you for the opportunity to submit on the draft plans for the PC2.



J A McPhail
Chair