

Received: 31/10/23
Sub No: 5801
NOCCS: 939570224
17905

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

TO:
Senior Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
NELSON 7040

Submitter:
Full Name: Allison Tuckwell
Address:

Telephone:
Email: allituck@gmail.com

I do not obtain an advantage in trade competition through this Submission

I wish to be heard in support of my Submission at the Council Hearing

I **OPPOSE** the Plan Change; and particularly the following

1. the creation of a High Density Residential Zone (HDZ), that has a max height greater than 12m, as it is not mandated under NPS-UD 2020
2. the loss of the existing protection for sunlight to all properties, because it is a critical component of residential amenity in a city as it provides warmth and energy efficiency
3. The omission of any requirement to provide carparks in any new development

I **SEEK** the following decision from the Council

1. rear and side yard setback of not less than 1.5 metres
2. an amendment to ensure one car park is provided for each residential Unit in the areas presently proposed to be re zoned
3. that Council will prioritise housing growth and intensification within the inner City, before the current residential zones.

I 100% reject Plan change 29 in its entirety – but if it is not rejected then I would like to request the following change

I ask for the Council to remove the block of Domett Street/ Hardy Street/ Tasman Street and Nile Street from Plan 29 High Density Residential Zone (HDZ) and it be given the same classification as the other half of Domett Street/Bridge St block or The Wood area of Residential – Comprehensive Area/Residential Lower Density Area. This area should be removed due to the potential of flooding from the Maitai River and Brook Stream. This area should also be removed because the fault line is going through the middle of the block together with the whole block being in a liquefaction zone.

I ask that the Council complete further investigations into the flood hazard risks as I understand Tim Bayley of 52 Domett Street has shown that there is a large discrepancy in Tonkin and Taylors flood map overlay – Tonkin and Taylors report has been used as the basis of plan 29 and could be misleading to Nelson residents if it is found to be inaccurate.

It should be noted that after a report by Tonkin and Taylor, showing possible flooding from the Brook Stream the Kainga Ora development at 107 Nile St has been made to lift it's buildings 700 mm above ground. This flood report was not shown on any Plan29 flood overlay maps.

For further in-depth information please refer to our neighbourhood group submission.

Other comments or concerns I have about Plan Change 29

Suggestion for how Nelson could solve it's 'so called' housing crisis

I **acknowledge** that my name and address are required to be made publicly available

Submitter signature a Tuckwell Date 21/10/23
to be delivered or emailed to environmental.planning@ncc.govt.nz by 4pm 31/10/2023

Received: 31/10/23
Sub No: 5802
NACS: 534570224-
17903

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

TO:
Senior Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
NELSON 7040

Submitter:
Full Name:
Address:

Garry Dargatzidis

Telephone:
Email:

grrag73@gmail.com

I do not obtain an advantage in trade competition through this Submission

I wish to be heard in support of my Submission at the Council Hearing

I OPPOSE the Plan Change; and particularly the following

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For further in-depth information please refer to our neighbourhood group submission.

Other comments or concerns I have about Plan Change 29

Suggestion for how Nelson could solve it's 'so called' housing crisis

I acknowledge that my name and address are required to be made publicly available

Submitter signature

22 Oct 23

Date

to be delivered or emailed to environmental.planning@ncc.govt.nz by 4pm 31/10/2023

Received: 31/10/23
Sub No: 5803
Appl No: 1534 570 224-17901

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

TO:
Senior Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
NELSON 7040

Submitter: Oxane
Full Name: Oxana Edmonds
Address:

Telephone:
Email: roboksi@yahoo.com

☐
☐

I do not obtain an advantage in trade competition through this Submission

I wish to be heard in support of my Submission at the Council Hearing

I OPPOSE the Plan Change; and particularly the following

1. the creation of a High Density Residential Zone (HDZ), that has a max height greater than 12m, as it is not mandated under NPS-UD 2020
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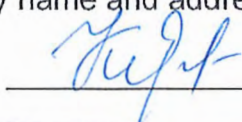
For further in-depth information please refer to our neighbourhood group submission.

Other comments or concerns I have about Plan Change 29

Suggestion for how Nelson could solve it's 'so called' housing crisis

I acknowledge that my name and address are required to be made publicly available

Submitter signature



Date 22/10/2023

to be delivered or emailed to environmental.planning@ncc.govt.nz by 4pm 31/10/2023

Received: 31/10/23
Sub No: 5804
No: 539570226-
17899

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

TO:
Senior Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
NELSON 7040

Submitter: R. Edmonds
Full Name: Robert Keith Edmonds
Address:

Telephone:
Email: robaksi@yahoo.com

I do not obtain an advantage in trade competition through this Submission

I wish to be heard in support of my Submission at the Council Hearing

I OPPOSE the Plan Change; and particularly the following

1. the creation of a High Density Residential Zone (HDZ), that has a max height greater than 12m, as it is not mandated under NPS-UD 2020
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For further in-depth information please refer to our neighbourhood group submission.

Other comments or concerns I have about Plan Change 29

Suggestion for how Nelson could solve it's 'so called' housing crisis

I acknowledge that my name and address are required to be made publicly available

Submitter signature 

Date 22/10/2023

to be delivered or emailed to environmental.planning@ncc.govt.nz by 4pm 31/10/2023

Rec: 31/10/23
Submission: S805

SUBMISSION FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

To:

Senior Planning Administrator
RMA Plan Submissions
Nelson City Council
P O Box 645
Nelson 7040

Submitter:

Lesley Anne Abrey

Email: anneabrey@xtra.co.nz

Date: 30 October 2023

I COULD NOT obtain an advantage in trade competition through this submission.
I DO wish to be heard in support of my submission.

Firstly, I reject Plan Change 29 in its entirety, but if it is not rejected then these are my points...

1. I acknowledge that I have found it difficult to digest the total effect of the proposed PC 29 and its supporting documentation due to its size and complexity. Therefore I am trusting that more qualified residents than I, will make more comprehensive submissions covering my concerns regarding the severe implications towards the well-being of existing rate paying residents of Nelson...
2. My concerns are as follows:
 - a) Loss of Winter Sunlight with new Recession Planes...
I note that NCC and TDC "Housing We'd Choose" report dated June 2021, ranks 'sunshine' as the highest preference for housing choice in Nelson and yet PC29 will remove that amenity from its existing residents, without warning or compensation. The loss of protection for sunlight to all properties, will have huge adverse affects, especially in the winter months... e.g.:
 - the lack of warmth and energy efficiency will lead to an increase in levels of damp and mouldy homes (and associated respiratory illnesses)
 - this will negate the positive aspects of solar panels (which obviously need sunlight), rendering existing, (expensive) installations as non-effective or even futile.
 - increased heating costs and associated carbon foot print.
 - b) Loss of Privacy and Outlook...
 - privacy is a critical part of enjoying a property and many residents have specifically purchased properties because of a desirable outlook, mostly paying a premium price for such.
 - c) Reduction in Property Values...
 - the value of a property and it's saleability will decrease, because the house becomes less desirable to live in.
 - d) PC 29 shows a lack of respect for Urban Heritage...
 - to build a contemporary high rise box only a few metres from a 120 year old historic home, is a thoughtless lack of long-term vision, which will have negative consequences for future generations.

WDCS: 539570224-17919

- existing layers of history within our community are doomed to be lost if we do not preserve heritage values, and stop future 'out of character' developments.
- it is noted that Nelson is cherished for its wonderful character, with so many residents conserving their old villas and bungalows - these little pieces of historic local heritage, could be literally and figuratively over-shadowed by neighbouring high rise buildings.

e) Increase in On-street Car Parking...

- increased intensification without providing off street car parking, will result in significant hazards to road users and pedestrians in some areas of Nelson where roads are extremely narrow, with little or no footpaths and steep drop offs.
- current on street car parking narrows a two-way road, to a single lane, and sometimes forces parking on footpaths to become the 'norm'.
- in places, trucks (including the weekly waste collection) have to reverse quite long stretches because of the lack of turning space.

f) Environmental issues... The increased capacity for dwellings with associated occupants puts pressure on our local environment in many ways...

in particular, water management, i.e. the ever increasing damage from severe 'weather events', means that we should be providing 'natural' landscaping that soaks up excess water and allows for a slow release (such as wetlands), rather than advocating for more 'hard' surfaces (such as intensification of buildings). Also green spaces, trees and landscaping are essential for the look and feel of our beautiful city (i.e. to maintain an essential part of the attraction of Nelson, for future residents and visitors), and for the health and well-being of its residents.

3. I am in support of Progressively Phased Intensification, which is design lead... But not 'zones' which are designated by drawing a few lines on a map of Nelson. The government has not mandated for Nelson (a tier two city) to intensify to the degree that this PC 29 indicates. And it seems that NCC has unnecessarily inflated the projection figures for population growth in Nelson accordingly. Therefore I recommend that NCC completely re-think their approach to the 'Intensification' of Nelson and provide a much more nuanced line of attack.

- Careful design controls (from the concept stage onward) must be undertaken in order to prevent Nelson from becoming a unsightly hotchpotch urban landscape.
- Any high-rise intensification should focus mainly in the Nelson CBD and then mid-rise in adjoining areas before considering residential suburbs.
- Projects should be designed on an ad hoc basis and subject to 'resource consent' requirements which protect the amenity values of neighbouring properties.
- Infill housing should be permitted where it is suitable and doesn't detract from amenity values.
- Residential neighbourhoods should be protected for future generations to enjoy and new developments thoughtfully designed and planned on a neighbourhood, by neighbourhood basis, to maintain the essence of their character.
- Green spaces, trees and landscaping are essential aspects of all neighbourhoods and definitely assist in the wellbeing of residents, plus help to provide an important part of the attraction of Nelson - which must all be considered during developing the growth of Nelson.
- I ask NCC to create a broader level of protection for neighbourhoods beyond the heritage buildings and precincts that still have historic character value from the early settlement years.

- I ask NCC to appoint an Urban Development Agency to carefully guide growth and actively facilitate the emergence of cohesive urban neighbourhoods, with a variety of high quality housing choices.
- I strongly oppose the High-Density Residential Zone. It is in no way in character or in keeping with any existing Nelson residential suburbs, and I ask NCC to remove HDRZ from the plan completely.
- I ask that NCC apply the General Residential Zone equally across the entire Nelson district on the introduction of PC29, on the basis that AP15 Daylight Admission protection rules will apply to all pre-existing properties, unless the owner gives written approval to the contrary.
- I ask that all other intensification proposals be done through a resource consent process (similar to the current process, where notification is required)... to protect the amenity values of existing residents (namely, sunlight and privacy).

4. Furthermore, I disagree with the make-up of the hearing panel, because of its biased public perception following the vote on Councillor Courtneys proposal to withdraw PC29 at the 14th September Council meeting. I ask NCC to appoint Councillors from either side of the Sept 14th vote.

I acknowledge that my name and address are required to be made publicly available.

signed:
(submitter)



date:

30 October 2023

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

Received: 30/10/23

S806

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: S Full Name: SELINA (WENDOLINE) Address: WILKINSON Telephone: Email: danwilk@extra.co.nz
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- ☒ I could not obtain an advantage in trade competition through this Submission.
☐ I wish to be heard in support of my Submission at the Council Hearing.

I OPPOSE the Plan Change; and particularly the following

1. the creation of a High Density Residential Zone (HDZ), that has a max height greater than 12 m, as it is not mandated under NPS-UD 2020
2. the loss of the existing protection for sunlight to all properties, because it is critical component of residential amenity in a City as it provides warmth and energy efficiency.
3. The omission of any requirement to provide carparks in any new development

I SEEK the following decision from the Council

1. rear and Side Yard Setback of not less than 1.5 metres
2. an amendment to ensure that at least one car park is provided for each residential Unit in the areas presently proposed to be re zoned
3. That Council will prioritise Housing growth and intensification within the Inner City, before the current residential zones;

I REQUEST that Council appoints an independent Panel to hear the Submissions; and gives a further Notice extending the Closing Date for Submissions

I ACKNOWLEDGE that I have found it extremely difficult to digest the total effect of the proposed PC 29 and its supporting documentation of over 2,000 pages,

Other comments or concerns I have about Plan Change 29

Nelson is on a major earthquake fault line which is why tall buildings were not permitted in the past. I feel this is a most valid reason to limit building heights ANYWHERE in the Region. Areas prone to flooding and slipping prohibited (Recent storm damage) altogether

Suggestion for how Nelson could solve it's "so called" housing crisis

If necessary maximum 3 storey flat roofed apartment blocks well spaced to allow communities green spaces, trees and possibly gardens to be used for and by residents. - eg. veg gardens?

I acknowledge that my name and address are required to be made publicly available



Submitter

29/10/23

Date

NB: TO BE DELIVERED TO NCC OR SENT TO environmental.planning@ncc.govt.nz by 4.00 pm

Tuesday 19th September

Extended. OCTOBER 31st

NDOC 539570224-17925

RMA Submission Form for Publicly Notified Plan Change 29



Return your submission by 4pm on
Tuesday 31 October 2023 to:

Senior Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
Nelson 7040

(Hand delivery or courier to: Ground Floor, Civic House, 110 Trafalgar Street,
Nelson 7010 or email to: environmental.planning@ncc.govt.nz with plan
change no.29 in the subject line)

*Required

Submitter Details

Full Name*	Diana Alicia Lau		
Organisation			
Contact Person			
Postal address*			
Telephone*		Email*	dianalau@xtra.co.nz

OFFICE USE
Submission No: 5807
Date Received Stamp: 31/10/23
NDOCs No: 539570224-17929

Trade Competition*

If you are a person who could gain an advantage in trade competition through the submission your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act 1991.

- ☒ I/we could not gain an advantage in trade competition through this submission.
- ☐ I/we could gain an advantage in trade competition through this submission. If yes, please complete the following:
- ☐ I/we are directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.
- ☐ I/we are not directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Council Hearing*

- ☒ I/we do not wish to be heard in support of my/our submission.
- ☐ I/we wish to be heard in support of my/our submission. If yes:
- ☐ I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings.

Public information

Please note that your name and address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as council.

Signature of Submitter*

(or person authorised to sign on behalf of submitter - a signature is not required if you make your submission by electronic means)

Date*

RMA Submission Form for Publicly Notified Plan Change 29

The specific provisions of the Proposed Plan Change that my submission relates to are as follows:

- ☐ Entire Plan Change
- ☐ Residential
- ☐ Inner City and City Fringe
- ☐ Industrial
- ☐ Suburban Commercial
- ☐ Natural Hazards/Climate Change
- ☐ Heritage

- ☐ Papakāinga
- ☐ Transport
- ☐ Mapping
- ☐ Infrastructure
- ☐ Area outside of Plan Change
- ☐ Subdivision
- ☐ Other

- I/we*: ☐ Oppose the Plan Change in part
☐ Support the Plan change in part
☐ Are Neutral about the Plan Change

- ☐ Oppose the Plan Change
☐ Support the Plan Change
☐ Request amendments to the Plan Change

My submission is*:

(Include whether you support or oppose the specific provisions or wish to have them amended, and reasons for your views)

RMA Submission Form for Publicly Notified Plan Change 29

I seek the following decision from the Council*:

(Give precise details, where amendments are sought, provide details below of what changes you would like to see).

That as part of its intensification policy
NCC first incorporates a policy of
comprehensive neighbourhood plans
being designed for all medium and
high density zones.

This will give certainty about form
and location of future buildings, open
spaces, etc.

Such plans to be agreed with the
community.

Note:

- 1) This form is only for the purpose of making a submission on Proposed Plan Change 29 to the Nelson Resource Management Plan. It is NOT for making a further submission (i.e., in support or opposition to an original submission) or for making a submission on a resource consent or on Council's Annual Plan.
- 2) It is not mandatory to use either the cover or content sheet of this form, however your submission must be in writing and provide the necessary information as indicated on the form, e.g., what is supported or opposed, the reason why and the decision sought, full contact details, etc.
- 3) Council cannot accept a submission that does not clearly indicate what a submitter wishes Council to do (i.e., Council to make a decision to refuse, amend or accept the Plan Change). Please indicate specific recommendations if amendments are sought. Council also cannot accept a submission that does not relate specifically to the Plan Change. In these cases, the submission may be considered 'Out of Scope' and may not be considered further.
- 4) Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - a. is frivolous or vexatious.
 - b. discloses no reasonable or relevant case.
 - c. would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
 - d. contains offensive language.
 - e. is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

31 Newman Drive,
Egger City, N.Y.,
Nelson 7011

Re: 31. 10. 23

Submission: S808

NDA: 539570224-17932

Nelson City Council,
re. Plan Change 29

To whom it may concern,

We believe that an adequate level of sunlight around and on everybody's house is a human need as of right to maintain physical and mental health; it is accepted now in our Country and provided for in planning and building law, in the minimum daylight angle required between buildings: 25.5 degrees.

The problems of shading and crowding can be mostly avoided by a firm adherence to and enforcement of this rule; it would tend also to prevent or at least greatly reduce the proliferation of lumpy apartment blocks in established, generally pleasantly laid out precincts.

We want to live in a congenial community, and can only do so if the rules of its arrangement embody consideration for everybody's fundamental human needs.

We ask that the most earnest efforts, carried out on soundest and tested principles of planning and design, are determined and continue to be applied in the ongoing development of Nelson City.

If anyone wants or needs to grow their

own food, (because of preference or they have chemical intolerances and have a restricted income) this is mostly possible at present as we have sufficient sunlight for a home garden, due to the minimum daylight angle rule that governs the placement and height and boundary distance of residential building.

Intensification of population by infilling existing established areas needs to observe this rule, to satisfy the right of privacy and no blocking of sunlight, for all residents.

While exceptions are already available on application, i.e.: for daylight angles, distance from boundaries, neighbouring buildings and roads, rights of way and public spaces; the agreement of neighbouring and affected property owners should be required.

The proposed removal of the present rules governing the building of oversize houses and units could lead to unintended and unfortunate consequences both to the lives of residents and the quality of the traditional residential environment.

We are not commenting on the proposal for the CBD involving Bridge Street and Haven Road, except to say we are not a European city.

Please consider everything very carefully.
We are all involved in this through our rates.
Please don't make Nelson unaffordable for us
and others. Our family line in Nelson goes
back to the 1860s.

We realize this is a government directive.
We have been following what is happening
in Christchurch and the dismay and worry
of the residents there.

The new Prime Minister elect has said he
would leave the decisions to councils.

We do hope you listen and hear us.

Yours Sincerely

Barbara Thorpe

Bernard Thorpe

P.S. We do not wish to speak at a hearing.

ph. 03 547 3396
021 547 339

e: mail ~~bb~~ bbthorpe2@gmail.com

Rec: 31/10/23
Submission: 5809

Senior Planning Administrator

RMA Plan Submission

Nelson City Council

PO Box 645

Nelson 7040

Environmental.planning@ncc.govt.nz

Jeanette Dungan

Email: jdungan@kinect.co.nz

Date: 31/10/2023

I would not gain an advantage in trade competition through this submission.

I reject PC29 in its entirety, but if it is not rejected then these are my submission points:

Submission Point 1: High Density Residential zones (HDZ)

1. I oppose the proposed HDZ in residential areas where there is no walking access to amenities (supermarkets, schools and public transport) and where there is a risk of increasing instability due to flooding and slips.
2. I support the proposed increase in residential density in the inner city with mixed residential and commercial zones where there is walkable access to shopping and public transport services.
3. I strongly oppose HDZ in the Tahunanui Hills area. I ask the Council to remove Tahunanui Hills from the proposed HDZ and make it GRZ because of ongoing slope instability in this area, lack of infrastructure, lack of the essential amenities (no supermarkets or public transport) within walking distance, and the increased likelihood of slips directly caused by intensification of development and frequent weather events.
4. I ask the Council to make sure all proposed HDZ have walkable access to a supermarket and bus service.
5. I support the building of multi-storey or underground car parks to free up more land within the inner city for development and to attract people back into the business area to do their shopping.
6. I support the inclusion of Daylight and Sunlight policy statement Para RE2.3.i: The reception of daylight and sunlight to each household unit is a critical component of residential amenity that provides warmth and energy efficiency, and is vital for outdoor activities such as gardening and recreation, not to mention emotional health.

Reasons for my opposition to the proposed Tahunanui High Density Zone

1. Slope instability

Due to land instability in the area, when I have undertaken major landscaping projects to safeguard and improve my property, it has cost me a lot of money in mandatory geo-tech reports, permits, inspections, and in added construction costs. The most recent work was to install a new pipe on my

NDocs: 539570224-17934

land through which flows a creek from above. I understand that storm-water from properties above feed into this, which is why the volume seems to have increased markedly over the 43 years I have lived here. Already, with heavy rain as recently as August 2023, this overflowed through my property. More new houses above will only worsen the risk of this happening more often.

I am very concerned about the possibility of new housing developments being built on upper Tamaki Street and above Rangiora Terrace. One only has to look through the old Nelson Photo News magazines to see photos of slips on Rangiora Terrace and above Tahunanui Drive to realise that an HDZ in this area would be unwise.

My own property slipped at the front corner in the August 2022 flood, and there were two other slips further down the hill which caused the road to be closed for a time. When the road was widened many years ago, the Council cut into the bank but, despite my complaints at the time, nothing was ever done to apply some form of protection against slipping. Other properties further up Tosswill Road and Stansell Avenue had big retaining walls constructed at Council expense. Perhaps the money ran out early, though a Council employee told me it was because my house was further from the road and therefore less likely to be affected by slipping at the front.

The Beca Slope Stability Report 2021 states:

"The distribution of mapped landslide deposits identifies locations of deep-seated landslides which may be re-activated during heavy rainfall, seismic events, and/or due to construction activities.

Triggers for slope movement may include rainfall, earthquakes, physical and/or chemical weathering, and land development"

2. Amenities

Despite what the planning team states about the Tahunanui Hills being close to amenities, there is really only the school. There are no supermarkets, and a long slog back up the hill if one does walk to the "amenities".

We did have a very convenient light bus service passing Tosswill Road morning and afternoon to take residents into the CBD. This service has disappeared, which is a very short-sighted action by the Council. The elderly are unlikely to use the big blue behemoths because it is too far to walk to a bus stop. The new buses also take up at least three parking spaces at their stops.

Elderly residents who like to take a walk to keep fit will not find many benches to take a rest after trudging up the hill from the bus stop on Muritai Street – one on the Tosswill Reserve, and one at Paddy's Knob. I consider the lower Tamaki Street pathway, where there is another bench, to be beyond the capability of most elderly pedestrians.

The Tosswill Reserve Walking Track and Paddy's Knob are amenities, but there are no playing areas for children. The steps at the top of Tamaki Street are not for the faint-hearted.

I consider parking to be an important amenity. More dwellings up shared driveways will mean an increased number of vehicles parked on the roadside, and longer walks for folk who drive to visit friends where there is limited off-street parking.

3. Traffic

The installation of speed humps in the area has made crossing the road safer, but there are other obstacles. On alternate Mondays, there is a Can Plan Greenwaste Collection, the Council's recycling bin, rubbish bag and glass bin collection. The footpath is not very wide in places: some residents put their bins out on the footpath, while others put theirs on the road. If I am walking, I have to switch between the gutter and the footpath to avoid the bins. Even if residents put the bins out tidily, the collection team just dump the bins back empty in a very haphazard fashion adding to the problem. Sometimes I have to drive up Tosswill Road, park on the roadside, walk back to move an empty bin that is blocking my driveway, so that I can drive up to the house. New residences will mean more driveways, often shared, so there will be many more obstructions to negotiate.

4. Sunlight and Shading Effects

I have a large enough property so as not to be affected immediately by a dwelling that could cause loss of sunlight; however, I do believe that adequate sunlight is a key factor for good mental health, as it is known that some people suffer Seasonal Affective Disorder, when they do not have enough sunlight. HDZ would allow smaller sections, more height, and so could potentially affect the light advantages most of us enjoy.

5. Trees and Gardens

I have several large trees on my property, some planted when the house was built in about 1950. I have had my experience that when people build on a section above, or next to, one with large trees, it is not long before they want the trees cut down, topped, or thinned, so they do not lose the sunlight or their view. The trees and other plantings are good for the environment in so many ways: providing a habitat for native birds and for slip protection.

7. Intensification

Multi-storey buildings belong on the flat. The additional expense of geo-tech reports and the extra construction procedures for hillside houses will increase the cost of building – and new buildings could potentially destabilise the land. If the Council permits a dwelling which is built to Council permit/consent, will the Council be financially liable if the land should slide and the house becomes red-stickered? Focus should be on the inner-city redevelopment where two birds can be killed with one stone.

The Plan Change 29 Process

I trust the Council will consider submissions fully and engage in further consultation with the residents of Tahunanui Hills before proceeding. I ask that I be informed by email or letter about any zoning changes that will affect my property. Thank you for the opportunity to submit – I look forward to seeing what happens now.

Jeanette Dungan



Received: 30/10/23

NDocs - 539576224-17938

ROBERT magnus Bruce

- Other comments or concerns I have about Plan Change 29

Want a right of appeal
for any ~~Planned~~ Tall
Buildings

intensifying the
inner city first!

R m Bruce

25. 10 20 23

NB: TO BE DELIVERED TO NCC OR SENT TO environmental.planning@ncc.govt.nz by 4.00 pm

~~Tuesday 19th September~~

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

Received: 30/10/23

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: Full Name: NARUMON GLUMGLAI Address: Telephone: Email: narumon.glumglai@yahoo.co.nz
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5811

- ☒ I **could not** obtain an advantage in trade competition through this Submission.
☒ I **wish** to be heard in support of my Submission at the Council Hearing.

I OPPOSE the Plan Change; and particularly the following

1. the creation of a High Density Residential Zone (HDZ), that has a max height greater than 12 m, as it is not mandated under NPS-UD 2020
2. the loss of the existing protection for sunlight to all properties, because it is critical component of residential amenity in a City as it provides warmth and energy efficiency.
3. The omission of any requirement to provide carparks in any new development

I SEEK the following decision from the Council

1. rear and Side Yard Setback of not less than 1.5 metres
2. an amendment to ensure that at least one car park is provided for each residential Unit in the areas presently proposed to be re zoned
3. That Council will prioritise Housing growth and intensification within the Inner City, before the current residential zones;

I REQUEST that Council appoints an independent Panel to hear the Submissions; and gives a further Notice extending the Closing Date for Submissions

I ACKNOWLEDGE that I have found it extremely difficult to digest the total effect of the proposed PC 29 and its supporting documentation of over 2,000 pages,

Other comments or concerns I have about Plan Change 29

The process has been rushed through without preliminary community consultation. Lack of consent from neighbours would be a serious problem. The right to build 3 units on small city sections is ridiculous. Sunlight angles are wrong and V. important. Noise control and parking serious concerns.

Suggestion for how Nelson could solve it's "so called" housing crisis

Better use of underutilised inner city buildings. Low rise intensification is more acceptable. City council could buy back bigbox retailers who are relocating to Tahunanui, and redevelop. Restrict highrise to CBD. Encouraging house development by providing land.

I acknowledge that my name and address are required to be made publicly available

Narumon Glumglai

Submitter

30th Oct. 23

Date

NB: TO BE DELIVERED TO NCC OR SENT TO environmental.planning@ncc.govt.nz by 4.00 pm

Tuesday 19th September

NDOCS-539570224-17943

RMA Submission Form for Publicly Notified Plan Change 29

Return your submission by 4pm on
Tuesday 31 October 2023 to:

Senior Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
Nelson 7040

(Hand delivery or courier to: Ground Floor, Civic House, 110 Trafalgar Street,
Nelson 7010 or email to: environmental.planning@ncc.govt.nz with plan
change no.29 in the subject line)

*Required

Submitter Details

Full Name*	ALASTAIR DAVID COTTERILL		
Organisation	MEMBER OF PUBLIC		
Contact Person	ALASTAIR DAVID COTTERILL		
Postal address*			
Telephone*		Email*	tigertennisnz@yahoo.com

OFFICE USE

Submission No: S812

Date Received Stamp:

31/10/23

NDOCs No:

589570224-17944

Trade Competition*

If you are a person who could gain an advantage in trade competition through the submission your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act 1991.

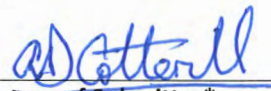
- ☒ I/we could not gain an advantage in trade competition through this submission.
- ☐ I/we could gain an advantage in trade competition through this submission. If yes, please complete the following:
- ☐ I/we are directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.
- ☐ I/we are not directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Council Hearing*

- ☐ I/we do not wish to be heard in support of my/our submission.
- ☒ I/we wish to be heard in support of my/our submission. If yes:
- ☐ I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings.

Public information

Please note that your name and address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as council.


Signature of Submitter*

(or person authorised to sign on behalf of submitter - a signature is not required if you make your submission by electronic means)

31/10/2023
Date*

RMA Submission Form for Publicly Notified Plan Change 29

The specific provisions of the Proposed Plan Change that my submission relates to are as follows:

- | | |
|--|--|
| ☐ Entire Plan Change | ☐ Papakāinga |
| ☒ Residential | ☐ Transport |
| ☒ Inner City and City Fringe | ☐ Mapping |
| ☐ Industrial | ☐ Infrastructure |
| ☐ Suburban Commercial | ☐ Area outside of Plan Change |
| ☐ Natural Hazards/Climate Change | ☐ Subdivision |
| ☐ Heritage | ☐ Other |

- I/we*: ☒ 
- | | |
|---|--|
| ☐ Oppose the Plan Change in part | ☐ Oppose the Plan Change |
| ☐ Support the Plan change in part | ☐ Support the Plan Change |
| ☒ Are Neutral about the Plan Change | ☐ Request amendments to the Plan Change |

My submission is*:

(Include whether you support or oppose the specific provisions or wish to have them amended, and reasons for your views)

I am neutral about plan change but the height of buildings in residential area and Inner-City and City Fringe need to be carefully thought ^{are through} for the future of Nelson City and Tahunanui where I live. We have outstanding city in Nelson and the suburb ^{or} of Tahunanui is beautiful. I believe in development and progress but has to done on a case to case basis. When I ^{are} ~~spoke~~ ^{speak} in at NCC about my submission will speak in more detail.

Thank-you for your time.

RMA Submission Form for Publicly Notified Plan Change 29

I seek the following decision from the Council*:

(Give precise details, where amendments are sought, provide details below of what changes you would like to see).

I wish to make it clear the buildings in Nelson City can go to two storeys or three storeys but no more.

In Tahunanui where I live we can have two or three storeys but no more.

I will explain in more detail when I speak in Council about my submission.

Thank you for your time.

Note:

- 1) This form is only for the purpose of making a submission on Proposed Plan Change 29 to the Nelson Resource Management Plan. It is NOT for making a further submission (i.e., in support or opposition to an original submission) or for making a submission on a resource consent or on Council's Annual Plan.
- 2) It is not mandatory to use either the cover or content sheet of this form, however your submission must be in writing and provide the necessary information as indicated on the form, e.g., what is supported or opposed, the reason why and the decision sought, full contact details, etc.
- 3) Council cannot accept a submission that does not clearly indicate what a submitter wishes Council to do (i.e., Council to make a decision to refuse, amend or accept the Plan Change). Please indicate specific recommendations if amendments are sought. Council also cannot accept a submission that does not relate specifically to the Plan Change. In these cases, the submission may be considered 'Out of Scope' and may not be considered further.
- 4) Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - a. is frivolous or vexatious.
 - b. discloses no reasonable or relevant case.
 - c. would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
 - d. contains offensive language.
 - e. is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Fee: 31/10/23
Submission: S813
Senior Planning Administrator
RMA Plan Submission
Nelson City Council
PO Box 645
Nelson 7040

Environmental.planning@ncc.govt.nz

NOCS: 339570224-17946

Submitter:

Full Name: Lorna Elaine Sygrove

Address: :

Telephone:

Email: lornasygrove@gmail.com

Signature of Submitter:

Date: 31/10/23



I COULD NOT obtain an advantage in trade competition through this submission.

I DO NOT WISH to be heard in support of my submission.

Introduction

I settled in Nelson in 2017 to live next to my daughter and son-in-law after my husband died. As an elderly resident of Seymour Avenue I appreciate the wonderful wide verges where I can walk my little dog. I also appreciate the speed humps that have been put in, which make crossing the road so much safer for me, as I am very slow and use a walker. I love our Heritage precinct and feel proud to own a Heritage B listed home. I offered my home as part of the Heritage Home Trail Cancer fundraiser a few years ago and joked with people who came through that the house was as old as I was. (I turned 97 earlier this year) A Seymour Avenue Heritage Precinct Group Submission has been submitted on my behalf to address the issues pertaining directly to our Heritage Precinct. This submission is my personal one which looks at the city and region as a whole.

Firstly, I reject PC 29 in its entirety, but if it is not rejected then these are my points...

1) The Plan Change 29 Process. I want to acknowledge...

- a) That I have found it difficult to digest the total effect of the proposed PC 29 and its supporting documentation due to its size and complexity.
- b) That access to a paper copy of PC 29 and the Section 32 reports has not been made available for residents who do not have access to, or the ability to use a computer.
- c) That I have found PC 29 lack of early public engagement and consultation by Council, with its severe implications towards the well-being of existing rate paying residents enjoyment of their properties, extremely stressful and unnecessary.
- d) That I have been put in a position of hoping more qualified citizens than I, will make more comprehensive submissions covering my concerns as to the future of Nelson and its rate paying residents.
- e) That Council Planning Staff have stated at numerous meetings "This is a 'Broad Brush approach' that requires public submissions to refine the plan". Such a statement implies PC

29 has been prematurely put out for public submissions in an incomplete and inaccurate state that requires the public to learn and understand its entirety, so they can re-design it.

- i) I am asking Council to withdraw PC 29 and get Council Planning staff to refine the plan design and then put it back out for public submissions.

2) Hearing Panel

- a) I strongly disagree with the make-up of the hearing panel, because of its 'biased' public perception following the vote on Councillor Courtneys proposal to withdraw PC29 at the 14th September Council meeting.
 - i) I ask the Council to appoint experts in urban and environmental design

3) NCC's Population forecasts

- a) These are a pivotal aspect for the scale of which Nelson needs to enable intensification and growth. The forecasts used by NCC are not Statistics NZ medium projections, but are over inflated projections that require the scale of intensification to be greater than those of Statistics NZ.
 - i) I ask the Council to use Statistics NZ medium projection forecasts, as recommended by the NPSUD Capacity: Guide on Evidence and Monitoring, para 2.1.1 and amend its intensification requirements accordingly.

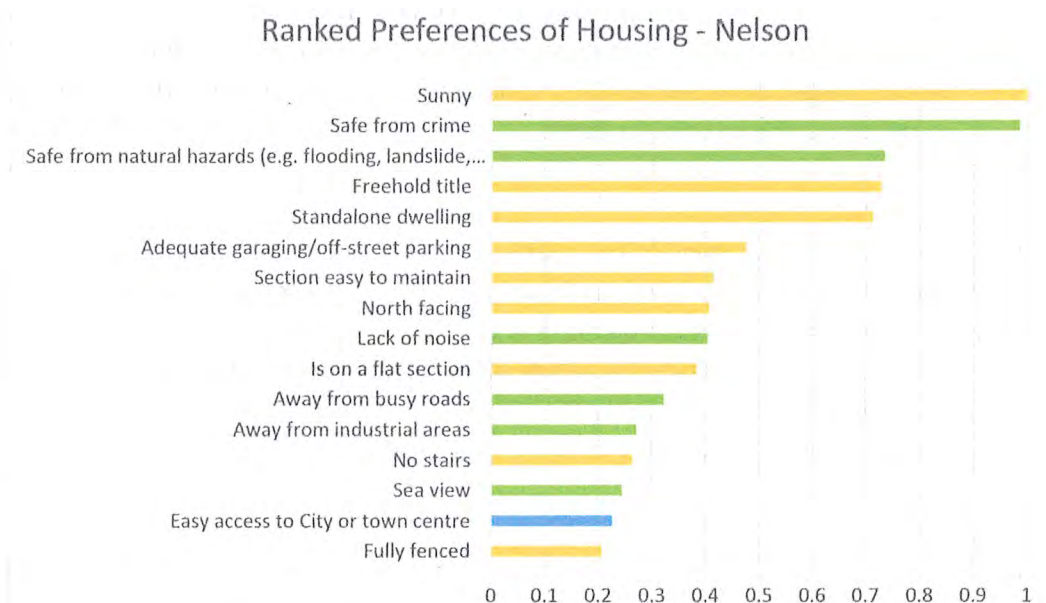
4) Design Lead and Not Developer Lead Growth.

- a) Nelson is a very special and unique place that needs to be protected. It is unlike any other district in NZ. It includes a 'Low Rise' City with a collection of heritage and non-heritage character buildings that have attracted people for generations and have been a cherished holiday destination for many New Zealanders.
- b) Residential Neighbourhoods should be protected for future generations to enjoy and new developments thoughtfully designed and planned on a neighbourhood, by neighbourhood basis to maintain the essence of their character.
- c) We need to protect and retain CBD historic facades as an essential part of the character of the Inner City. Any intensification should be done selectively in order to preserve the light and visual appeal without adversely affecting existing residences and occupied buildings. I ask Council to protect our Character buildings and facades so that developers are not allowed to demolish them or move them off-site. This would completely change the look and feel of our city. It would become another ugly concrete jungle.
- d) Contemporary Black Iron Clad box-like buildings for example, built only a few metres from 120-year-old Historic Homes does not show long-term vision for maintaining the attraction of Nelson for all the future residents and visitors.
- e) Green Spaces, Trees and Landscaping are essential for the look and feel of our neighbourhoods. They also provide shelter and shade, retain moisture in the soil, filter impurities from the air, store carbon, provide oxygen and stabilise the ground. In times of extreme drought these properties help protect the land. Green spaces and trees/plantings have a very positive affect on mental health, both for residents and people travelling through these areas. (See Lancet Study document attached)
- f) I ask the Council to create a broader level of protection for neighbourhoods beyond the heritage buildings and precincts that still have historic character value from the early settlement years of Nelson.
 - i) I ask the Council to appoint an Urban Development Agency (UDA) to carefully guide growth and actively facilitate the emergence of cohesive urban neighbourhoods with a variety of high-quality housing choices.

5) Sunlight Recession Planes and Shading Effects

- a) Sunlight is a **CRITICAL** part of living in Nelson. I would go as far as saying it is a basic human right. It is not called the 'Sunshine Capital of NZ' for nothing. It is well documented that people relocate to Nelson because of the Sun and accept reduced wages called 'Sunshine Wages' for that privilege. In a report on housing preferences commissioned by NCC and TDC in June, 2021 for the Future Development Strategy (FDS), sunshine was the top priority for housing location.

Figure 4.9: Ranked Preferences of Housing – Nelson Urban



- b) TDC even 'Encourage the Sun into your home'. See <https://www.tasman.govt.nz/my-property/building-and-alteration/heating-and-insulation/energy-efficiency-and-heating-your-home/>
- c) Solar panels on our homes are beneficial for the environment as well as taking the drain off our national grid. Nelson is particularly suited to solar energy production which adds weight to ensuring people's houses are not shaded by new builds. I ask the council to ensure this is a non-negotiable clause for all future intensification.
- d) All existing houses built prior to and under the current daylight admission rules will be subjected to the loss of sunlight amenity under PC29 with the following effects: -
- Increased levels of mental health illness, anxiety and stress.
 - Increased levels of damp homes with associated mould and mildew and respiratory illnesses.
 - Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.
 - Increased heating costs, air pollution, carbon foot print, are all exacerbated due to a large portion of Nelson housing being old, with un-insulated walls and single glazing.
 - Reduction in property values and increased financial stress, because the house would be less desirable to live in.
 - Residents, struggling with the cost-of-living crisis may not be able to afford to heat their homes.
 - Property owners will be reluctant to invest in making additional new (low rise) infill improvements on their section, with affordable additional units that **COULD** be over

shadowed and devalued by a wealthier developer who could afford to build a multi-storey development next door at any time in the future.

- (1) I ask the Council to maintain the AP15 Daylight Admission protection rules to all pre-existing properties, unless the owner gives written approval to the contrary.
- (2) I strongly support the inclusion of Daylight and Sunlight policy statement Para RE2.3.i: The reception of daylight and sunlight to each household unit is a critical component of residential amenity that provides warmth and energy efficiency, and is vital for outdoor activities such as gardening and recreation. To ensure shading effects are minimised, and to ensure there is sufficient space around buildings to allow the admission of sunlight to the site, this Plan has provided for daylight controls on all side and rear boundaries. The policy also applies to larger non-residential buildings such as schools or halls. The basic premise is that the daylight and sunlight received on a residential site should be no different whether or not the neighbour is residential. This philosophy applies whether the building is on an adjoining site or across a street.

6) Privacy and Outlook

- a) Privacy is a critical part of enjoying a property.
 - i) I support the inclusion of RE2.4.iii, but ask Council to add the following [bracketed] words. 'The building Act controls windows in walls of buildings on or close to boundaries and the outlook rules ensure that residential units **[and their neighbours]** have a reasonable degree of privacy as well as encouragement for residential units to be orientated towards the street or public open space'.

7) Intensification

- a) I strongly oppose the High-Density Residential Zone. It is by no way in character or in keeping with any existing 'Low Rise' Nelson residential suburb and beyond the MDS legal mandate.
 - i) I ask Council to remove HDRZ from the plan completely.
 - ii) I ask Council to apply the new General Residential Zone equally across the entire Nelson district on the introduction of PC29, on the basis that AP15 Daylight Admission protection rules will apply to all pre-existing properties, unless the owner gives written approval to the contrary.
- b) I am strongly opposed to all new 'Green Field' developments being used for only single storey dwellings as it is a complete underutilisation of land that can accommodate increased intensification.
 - i) I ask Council to ensure a minimum of two storey dwellings be built on all new green field developments. Eg Golden Elms in Toi Toi, Ngawhatu Valley and Marsden Valley.
- c) Building holiday apartments that sit empty for long periods, does not solve our intensification, growth and affordability dilemma, and yet it locks up our valuable housing resource. Eg Rocks & Haven Road has many empty apartments.
 - i) I ask Council to consider solutions to mitigate against new-build empty holiday apartments.
- d) I oppose the increase of residential units beyond 4, as a **restricted discretionary** activity that does **NOT** require notification and written approval from neighbours.
 - i) I ask Council to ensure that more than 4 units requires notification, to restrict large 'out of character' accommodation blocks spanning multiple sections, and taking up lots of on street car parking spaces, popping up in a residential street, without warning.

- e) Bigger older properties, could be better utilised and help with our growth if they were more easily allowed to be divided into multi-dwellings.
- f) Building inner city apartments that offer an alternative solution to 'retirement villages', can free up the bigger homes for new families to occupy. The 'retired' occupants may also be less likely to be reliant on a vehicle, which may more closely suit the growth model desired.
- g) Designing Inner-City roof gardens and balconies with green spaces for commercial hospitality use or places for apartment living residents to relax and enjoy the Nelson Sun.
- h) Incentivise rate paying residents to demolish or relocate their house in favour of replacing more units on the same section providing they comply with the suitable character or heritage of the neighbourhood.

8) Progressively Phased Intensification

- a) Firstly, the Inner City should be the starting place to have the most significant intensification, before moving into the residential neighbourhoods; this can give more time to complete a better design vision for our residential neighbourhoods. I would ask the council to limit the height of the buildings to 3 storeys, which would not require elevators, are more earthquake proof and therefore more economical to build. The use of locally manufactured laminated wood instead of steel would add to the quake resistance, is more environmentally friendly and supports our local businesses.
 - i) I ask Council to make better utilisation of Car Only spaces, by developing them into shared spaces, with Accommodation overhead. 'Nelsust' highlights 44% of the Inner City as Car only spaces.
 - ii) I ask Council to retain para ICd.11 'The zone enables and encourages an increase in the density and diversity of quality housing in the City Centre by enabling residential activity above ground floor level. It is expected that over time, more people will choose to live in the City Centre because of its easy access to offices, shops, entertainment and varied open spaces and experiences'.
- b) Secondly, City Fringe would be the next zone to phase in for intensification.
 - i) I ask Council to negotiate and/or incentivise Industry and car yards to relocate, to less essential land that can be better used for accommodation.
 - ii) Areas such as the army base on Rutherford Street is an obvious example of an activity that could be moved elsewhere, leaving the space for intensification.
- c) Finally, the Residential Zones would be the last area to be phased in, by working out from the City Fringe Zone (and Central Stoke).
 - i) I would support Medium Density Residential Zones (3 storey 11m high) progressively expanding from the CBD (and Central Stoke) **if required and over time**, providing AP15 Daylight Admission Protection rules remain in force for existing properties. I would also ask that new builds are designed to aesthetically complement the neighbouring house styles. A good example of this are the apartments in Tasman Street (pictured on next page).

9) Intensification in hazard zones

- a) I ask Council to apply no greater than General Residential Zoning rules in all Hazard overlays, because these areas have been assessed as vulnerable and given that we are in a climate crisis, with increasing record-breaking weather events, affecting increasing areas of Nelson in ways not seen before then, I believe those areas should be treated with caution.



10) On-street car parking

- a) Increased intensification will result in more on-street car parking and the narrow streets of Nelson will become a hazard to pedestrians, mobility scooters, cyclists, refuse collection and Emergency Service vehicles. This will cause fracturing of neighbourly relations and communities.
 - i) I ask Council to provide a 'Comprehensive car parking management plan' as strongly encouraged by Policy 11 of the NPSUD 2020, to mitigate against these issues.
 - ii) I ask Council to use traffic calming solutions that do not lose on-street car parking spaces. Eg. Speed Humps, instead of Choke Points.

11) Social Housing

- a) Significant care and attention must be considered with all social housing because there are too many examples across the country where this has resulted in disharmony in communities.
- b) High density living for the homeless and vulnerable will not result in healthy outcomes for all concerned.
- c) Careful design controls from the concept stage onwards, will be rewarded in the long run, with less support required by Mental Health Services, Charity Services, Police and Social Services.
 - i) I would like to see Council working closely with Kainga Ora, to provide a 'transparent' way of creating new Social Housing Developments that 'Fit' with the long-term design vision of Nelson.

- ii) I would like to see Council have more fit for purpose controls for antisocial behaviour that affects the existing neighbour's enjoyment of their property.

12) Infrastructure

- a) I ask the Council to include a plan to mitigate against future drought situations with a greater demand on the same amount of water from the Maitai Dam, for a greater population.
- b) I ask the Council to include a plan to mitigate against the increased capacity requirements for our waste water systems.
- c) I ask the Council to include a plan to mitigate against the increased capacity requirements for storm water.
- d) I ask the Council to include a plan to provide schooling for the growing population as the schools are currently at capacity.
- e) I ask the Council to include a plan to provide extra GP clinics for the growing population as the GP surgeries are currently at capacity.
- f) I ask Council to consider the extra demand on hospital services for the growing population.

13) Problems and Solutions

I do not support greenfield's developments when they take up prime horticultural or recreational land. However, we have a problem with large areas of forestry close to residential areas eg. The Brook and Maitai Valleys. Exotic forests cause erosion as they change the acidity of the soil which in turn prevents any type of native undergrowth which would provide moisture retention healthy PH soil. The dryness of the exotic forest makes it a huge fire risk as we have seen in recent years. Here in Seymour Avenue we were on the brink of evacuation when an arsonist started the fire above Iwa Road and it looked like it might spread towards us.

One solution I propose would be to extend Market road to join Brook Street. This would enable the following:

- a) Provide an alternative evacuation route and emergency service route between Bishopdale and upper Brook Street. (This could also form part of the eBus route and provide cycle lanes)
- b) Divert traffic from Waimea Road and the City for those accessing Brook Street, The Brook Waimarama Sanctuary and the Brook Mountainbike Park. Divert traffic travelling West from lower Brook Street and the Seymour Avenue - Brougham Street - Van Dieman Street route.
- c) Provide an area for housing development to replace the forested hills.

I envisage a housing development where careful planning involves large scale native plantings, communal gardens and outdoor spaces. Urban design planners would help advise on the type of housing appropriate to the site. If possible multi level apartments could be built against the hill in such a way that they do not shade each other.



Ambient greenness, access to local green spaces, and subsequent mental health: a 10-year longitudinal dynamic panel study of 2.3 million adults in Wales

Rebecca S Geary, Daniel Thompson, Amy Mizen, Ashley Akbari, Joanne K Garrett, Francis M Rowney, Alan Watkins, Ronan A Lyons, Gareth Stratton, Rebecca Lovell, Mark Nieuwenhuijsen, Sarah C Parker, Jiao Song, Dialehti Tsimpida, James White, Mathew P White, Susan Williams, Benedict W Wheeler, Richard Fry, Sarah E Rodgers

Summary

Background Living in greener areas, or close to green and blue spaces (GBS; eg, parks, lakes, or beaches), is associated with better mental health, but longitudinal evidence when GBS exposures precede outcomes is less available. We aimed to analyse the effect of living in or moving to areas with more green space or better access to GBS on subsequent adult mental health over time, while explicitly considering health inequalities.

Methods A cohort of the people in Wales, UK (≥ 16 years; $n=2\,341\,591$) was constructed from electronic health record data sources from Jan 1, 2008 to Oct 31, 2019, comprising 19 141 896 person-years of follow-up. Household ambient greenness (Enhanced Vegetation Index [EVI]), access to GBS (counts, distance to nearest), and common mental health disorders (CMD, based on a validated algorithm combining current diagnoses or symptoms of anxiety or depression [treated or untreated in the preceding 1-year period], or treatment of historical diagnoses from before the current cohort [up to 8 years previously, to 2000], where diagnosis preceded treatment) were record-linked. Cumulative exposure values were created for each adult, censoring for CMD, migration out of Wales, death, or end of cohort. Exposure and CMD associations were evaluated using multivariate logistic regression, stratified by area-level deprivation.

Findings After adjustment, exposure to greater ambient greenness over time ($+0.1$ increased EVI on a 0–1 scale) was associated with lower odds of subsequent CMD (adjusted odds ratio 0.80, 95% CI 0.80–0.81), where CMD was based on a combination of current diagnoses or symptoms (treated or untreated in the preceding 1-year period), or treatments. Ten percentile points more access to GBS was associated with lower odds of a later CMD (0.93, 0.93–0.93). Every additional 360 m to the nearest GBS was associated with higher odds of CMD (1.05, 1.04–1.05). We found that positive effects of GBS on mental health appeared to be greater in more deprived quintiles.

Interpretation Ambient exposure is associated with the greatest reduced risk of CMD, particularly for those who live in deprived communities. These findings support authorities responsible for GBS, who are attempting to engage planners and policy makers, to ensure GBS meets residents' needs.

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Introduction

Poor mental health is one of the main contributors to the global disease burden, accounting for 4.9% of global disability-adjusted life-years.¹ There is growing evidence that living close to and spending time in and around green or blue spaces (GBS; eg, parks, gardens, ponds) is associated with fewer mental health problems. The proposed mechanisms underpinning this association include increased social contact, reduced cognitive impairment, reduced stress, and mental and physical health-promoting physical activity, alongside indirect mechanisms within wider ecological systems, such as improved air quality.^{2,3} There is, however, limited longitudinal evidence supporting changes in GBS affecting subsequent adult mental health.^{3,4}

There are inequalities in the distribution and accessibility of high-quality GBS. People in deprived areas, those from minority ethnic communities, older adults, and those with longstanding health conditions or functional limitations often have less physical access to good-quality GBS.⁵ These groups also tend to use GBS less and are more likely to have negative perceptions regarding their usage and the safety of such spaces.⁶ There is evidence suggesting associations between GBS exposure and reductions in health inequalities, both cross-sectional and longitudinal.^{7–12} Smaller-scale longitudinal studies in the UK also suggest associations between greater GBS exposure and better mental health and wellbeing,¹³ but some have been restricted to urban areas and used GBS exposures at the area level rather

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Department of Public Health, Policy and Systems, University of Liverpool, Liverpool, UK (R S Geary PhD, D Tsimpida PhD, Prof S E Rodgers PhD); Department of Health Data Science (D Thompson PhD, A Mizen PhD, A Akbari MSc, Prof A Watkins PhD, Prof R A Lyons FmedSci MD, S C Parker MSc, J Song PhD, R Fry PhD) and College of Engineering (Prof G Stratton PhD), Swansea University, Swansea, UK; European Centre for Environment and Human Health, University of Exeter Medical School, University of Exeter, Truro, UK (J K Garrett PhD, F M Rowney PhD, R Lovell PhD, B W Wheeler PhD); Cognitive Science Hub, University of Vienna, Vienna, Austria (M P White PhD); ISGlobal, Barcelona, Spain (Prof M Nieuwenhuijsen PhD); Centre for Trials Research, School of Medicine, Cardiff University, Cardiff, UK (Prof J White PhD); Natural Resources Wales, Bangor, UK (S Williams PhD)

Correspondence to: Sarah E Rodgers, Department of Public Health, Policy and Systems, University of Liverpool, Liverpool L69 3GF, UK
sarah.rodgers@liverpool.ac.uk

Research in context

Evidence before this study

We broadly followed the search strategy of a review of green spaces by Taylor and Hochuli, searching PsycINFO (EBSCO), Scopus (Elsevier), and CINAHL (EBSCO) from Jan 1, 2009 to Aug 8, 2018, including the core collection, CABI, BioSIS Previews, and Medline, across all years. A TOPIC search for "green space" was performed, returning 133 academic publications. The search terms were (("visit*" OR "proximity" OR "distance") AND ("health*")) AND (("natur*" OR "green space*" OR "NDVI" OR "green area") AND ("income" OR "socioeconomic status" OR "ses" OR "equigenesis" OR "equigenetic")) AND ("longitudinal"). We also included blue space terms and took a pragmatic approach to reports and grey literature, searching the websites of key organisations. We excluded studies that were not relevant to the intentions of our study (for example, spaces that were artificially painted green). In addition, we reviewed the main policy literature used in Wales, including the Fields in Trust guidelines, Recreation Opportunity Spectrum, Future Landscapes, and WHO, to collate green space definitions and typologies. We excluded conference proceedings and planning policy documents.

Substantial evidence, from both cross-sectional and some longitudinal studies, indicates associations between green and blue space (GBS) exposure and mental health and wellbeing. Existing studies mostly had small cohorts, assessed change over a short duration, and did not investigate socioeconomic inequalities. Cross-sectional studies cannot determine whether GBS exposure precedes good mental health. A recent National Institute for Health Research study, led by Ward Thompson, evaluated Forestry Commission Scotland's Woods in and Around Towns programme (designed to increase access to urban

woodlands) by collecting primary data at three sites. It found no benefit to community-level mental health within 6 months; however, it concluded that increasing the number of sites and the follow-up duration by using routine data (the type of data used in the present study) could capture the community mental health benefits of such low-cost nature-based interventions.

Added value of this study

Using medical records of an entire adult population, this study presents the largest, most comprehensive longitudinal evaluation of the effect of differences in exposure to GBS on mental health and wellbeing over a 10-year period. The study suggests that GBS exposure has a protective effect against common mental health disorders (CMD), particularly for adults living in deprived communities. Time-aggregated exposure data, censored at CMD recording, reduces the potential for reverse causality while maximising the spatial-temporal differences in exposure to GBS between different people at a highly granular household level.

Implications of all the available evidence

Evidence from our research highlights the likely beneficial role of adequate ambient greenness and access to GBS in reducing socioeconomic-related inequalities in mental health. Investing in improved ambient greenness and in public green spaces might bring population mental health benefits, especially for those with a history of CMD. Future research should investigate why those living in lower-income and higher-income areas are affected differently by greenness exposure and potential GBS access, and explore further potential effect modifiers of the association between GBS and mental health outcomes.

than household level.^{13,14} Although studies using experimental designs have been used to investigate the effects of GBS change in the UK on mental health, the results have been inconclusive, with, for example, potential time lags in realisation of benefits highlighted.¹⁵

This study analysed the effect of accrued household ambient greenness and availability of GBS over time on subsequent adult mental health, explicitly considering health inequalities and disentangling the mental health benefits of GBS from living in greener areas. We did this by anonymously tracking individuals over time and allocating GBS exposures at the more granular household, rather than small-area, level. Many previous studies measured green space exposure across small areas at a single time point, assuming the amount of vegetation did not vary within these areas or change through time.^{16–18} Apart from a few quasi-experimental studies in which people were allocated to social housing units with different levels of surrounding green space,¹⁷ results of place-based interventions investigating health effects using small areas might have recorded the

health outcomes of a different, healthier population rather than the effects of exposure to green space. Individuals are mobile and might change residence, particularly when a neighbourhood is gentrified; thus, the small-area population characteristics will change over a period of years. Here, we use routinely updated addresses to overcome the challenge of tracing mobility within these datasets.¹⁹ We focus on individuals and their aggregated household exposure as it changes over time, thereby avoiding the issues of measuring outcomes of an incorrect historical population that can affect small-area studies.

Methods

Study design and data sources

We performed a population-scale study using a new electronic cohort of people (aged ≥16 years) in Wales, UK between 2008 and 2019. The cohort was constructed using data from the Welsh Demographic Service Dataset, containing individual-level anonymised demographic characteristics of everyone registered with a National

Health Service (NHS) general practitioner (GP) in Wales. This dataset includes addresses provided by patients with from-to dates of residency in each home (updated when patients informed their GP they moved home, or changed GP), used to calculate residency dates in each home and house moves.²⁰ All household members aged 16 years or older were included in the cohort, with individuals nested within each household. The Welsh Demographic Service Dataset contains demographic characteristics of all people registered with an NHS GP in Wales that is free at the point of care, who provides data to the Secure Anonymised Information Linkage (SAIL) Databank unless individuals have requested to opt out (80% population coverage²¹). Thus, using these routinely collected data provides a largely inclusive population dataset most suitable to apply a health equity lens.

The cohort was linked to data from GP records (to derive the common mental health disorders [CMD] outcome), the Annual District Death Extract from the Office for National Statistics mortality register (for censoring), the Welsh Index of Multiple Deprivation (WIMD 2011 applied up to 2014 and WIMD 2014 applied from 2014), and rural-urban Office for National Statistics classifications for Lower Layer Super Output Areas.²² These data were available in the SAIL Databank, an anonymised data safe haven.

We created one measure of household ambient greenness (within 300 m radius) and two of local GBS access (within a 1600 m footpath or road-accessible network buffer; table 1). Ambient greenness was measured, reflecting the density of vegetation using a validated measure called the Enhanced Vegetation Index (EVI), which has the advantage over normalised difference vegetation index of optimising the vegetation signal and reducing atmospheric noise. The substantial topographical variation in our study area (Wales, UK) made EVI the most appropriate measure as it is less susceptible to the effects of topographic seasonal factors. We calculated this within 300 m of each home in Wales. Based on earlier work, we hypothesised that some benefits of exposure to greenness will be gained without necessarily having to physically visit GBS (reduced noise, green views, etc). This measure captures the presence of green space (eg, parks, domestic gardens) and other green infrastructure (eg, street trees, green roofs). The ambient greenness measure was derived from satellite data (Landsat 2008–2019).²³ We selected images from springtime to minimise the number of poor-quality images due to cloud cover. Cloud-free images taken between May and July were downloaded for each year. We applied the Dark Object Subtraction 1 atmospheric correction method to each image as recommended by Young and colleagues²⁴ and calculated the EVI for each image using the vegetation index GRASS tool in QGIS.²⁵ We also created cloud masks for each image using the Cloud Masking for Landsat Products plugin.²⁶ We used the cloud masks to set pixels

covered by cloud in the satellite imagery to NULL to prevent these values from influencing the final greenness density. A larger EVI score does not necessarily equate to more greenness by area but instead represents a larger volume (increased biomass) of green. A small forest, for example, could produce the same EVI score as a large area covered in grass.

The primary GBS access metric estimated the potential access to GBS (eg, park, woodland, lake, river) within 1600 m (approximately 1 mile) of the home. The 1600 m cutoff was informed by the Monitor of Engagement with the Natural Environment survey, which indicated that this is the distance within which a rapid decline in greenspace use is reported.²⁷ We created two access measures: the first counted the numbers of GBS, and the second was the distance to the nearest GBS. Both measured potential access to GBS within 1600 m of the home and were generated from a combination of the Ordnance Survey MasterMap Topography Layer (2018) to capture natural and human-made features, including the outline of homes and parks, and Ordnance Survey Greenspace dataset (2018).²⁸ These data were augmented with local authority technical advice notes (TAN 16), containing legally mandated data on sport, recreation, and open spaces managed by local authorities; open-source portal data (forestry or urban tree cover, publicly available at DataMapWales); and OpenStreetMap road and footpath data.²⁹ Although farmland constitutes large areas in rural regions, this is privately owned land. We were unable to obtain data on rights of way in rural areas and therefore excluded privately owned farmland, which might have included sections that are publicly accessible. We only included publicly accessible green spaces (and therefore excluded farmland from our GBS access measures) because our aim was to provide evidence on modifiable aspects of the built and natural environment for planning and policy guidelines.

EVI and our GBS access measures capture different aspects of the environment surrounding, or close to, the home (and at different proximity). EVI includes private gardens and farmland, and does not differentiate between spaces that are accessible or inaccessible. Our GBS access measures include both green and blue spaces but are restricted to those that are potentially accessible to the public, excluding farmland for example. Rural areas, therefore, might have high EVI values but low GBS accessibility, whereas coastal or seafront areas might have low EVI values (due to large areas of blue space) but high GBS accessibility.

We used a GBS typology (appendix pp 2–3) to categorise land parcels into types of GBS that people can potentially access, both visually and physically. To create realistic travel distances, rather than use radial distances, we defined access points based on feature types that were attached to the closest footpath or road network access point. We estimated the distance to all GBS access points within 1600 m of each home in Wales in 2018.

For DataMapWales see <http://datamap.gov.wales>

See Online for appendix

	Measure (source)	Description	Data type
Ambient greenness within 300 m of all homes			
Presence of green space (eg, parks, domestic gardens) and other green infrastructure (eg, street trees, green roofs) within a 300 m linear buffer of each home, without assumptions on availability for public use	Annual mean EVI within 300 m of each household (Landsat satellite imagery 2008–2019)	Measure of vegetation within 300 m of the home; measurements derived from remotely sensed satellite images	Continuous (0.1 unit increase in regression analyses)
Potential to access GBS within 1600 m of all homes			
Number of GBS that people can potentially access within a 1600 m footpath or road-accessible network buffer of each home	Count of GBS within 1600 m of each household location using a network model (various vector data)	Measure of density of potentially accessible GBS within 1600 m of the home	Continuous (0.1 unit increase in regression analyses)
Distance to nearest potentially accessible GBS within a 1600 m footpath or road-accessible network buffer of each home	Distance to nearest GBS within 1600 m of each household location using a network model (various vector data)	Distance from residential address to nearest access point for potentially accessible GBS within 1600 m of the home	Continuous (0.1 unit increase in regression analyses)

EVI=Enhanced Vegetation Index. GBS=green and blue spaces.

Table 1: Summary of green and blue space exposure metrics

We included all GBS that met any included categorical type (appendix pp 2–3), regardless of size, because our outcomes were not dependent on the use of a space, eg, for physical activity, but could include micro-parks where people go to relax, or other types of space (eg, verges) that contribute to local residential greenness. A single park could comprise several hundred small green or blue shapes. Within a single park there might be a botanic garden, a children's play area, and a boating lake, each comprising several shapes. Additionally, grass verges and other 'green infrastructure' components were included; thus, there might be 200 GBS counts equating to a small park, and several other spaces within 1600 m of home. By counting each small shape, we obtained a near-continuous measure of GBS for each resident in Wales (mean 6.1, SD 4.5). The metric was scaled to a 0–1 range, with normalised GBS access values ranging from 0 to 0.55. A 0.1-unit increase equated to 236 additional GBS.

Environmental data were linked to individuals in the cohort using a residential version of the split file linkage process.^{20,29,30} Data for each GBS metric (table 1) were aggregated into normalised single values for ambient greenness or potential to access GBS for each individual based on their home location(s). Although our focus for access was on the number of GBS within 1600 m of the home, we also explored the distance to the nearest GBS in sensitivity analyses. The period of aggregation used all quarters, up to and including that before a CMD was recorded, the individual died, moved out of Wales, or the cohort ended in 2019.

We identified people with a CMD (anxiety or depression) by applying a validated algorithm of read codes recorded in the GP dataset. The algorithm (appendix pp 4–6) was based on a combination of current diagnoses or symptoms (treated or untreated in the preceding 1-year period), or current treatment of historical diagnoses from before the current cohort began, looking back up to 8 years (to 2000). A CMD treatment was defined as at least one prescription

for an antidepressant, anxiolytic, or hypnotic in the 1-year current period. The algorithm required a diagnosis or symptom of a CMD prior to counting treatments, to account for multiple prescribing purposes of some treatments. Although we could not count non-drug treatments, because these data were not available in the GP data, the algorithm will have extracted some people with a CMD diagnosis or symptoms who will have been prescribed alternative non-medication treatments. Hereafter, we refer to this as our CMD outcome.

Covariates included a binary measure of sex as recorded in each individual's electronic health record from the Welsh Demographic Service Dataset (hereafter referred to as male [reference] or female), age group (categorised as 16–21 [reference], 22–30, 31–40, 41–50, 51–60, 61–70, 71–80, and 80 years or older), area-level socioeconomic deprivation (quintiles of the full WIMD score, with least deprived as the reference), home moves (yes, one, more than one), birth(s) in household (yes, no), death(s) in household (yes, no), and urban or rural category (village, hamlet, and isolated dwellings; town and fringe; or urban conurbation >10 000 population), defined using Office for National Statistics settlement type categories.²² The full WIMD score was used in analyses, as this is the Welsh Government's official measure of relative deprivation for small areas in Wales. It identifies areas with the highest concentrations of several different types of deprivation. WIMD is calculated for all small areas (Lower Layer Super Output Areas) in Wales. Following the 2011 Census, 1909 Lower Layer Super Output Areas were defined in Wales with an average population of 1600 people. The methodology used within WIMD 2014 is the same as used for WIMD 2011.³¹ For each individual, covariates were derived from data in the same time interval as the environmental measures. This included all quarters up to and including that before a CMD was recorded, or the individual moved out of Wales, or the cohort end in 2019. Data on sex were extracted from NHS electronic health records and so are likely to reflect participants' sex

assigned at birth. A new NHS number would be generated as part of gender reassignment, but sensitive code policies mean those data are not available in the SAIL Databank and these people would appear lost to follow-up.

We structured the data to ensure environmental exposures preceded CMD outcomes by only using exposure data prior to the first recorded CMD. This allowed us to test the question: does household ambient greenness and availability of GBS affect subsequent adult mental health, explicitly considering health inequalities and disentangling the mental health benefits of GBS from living in greener areas? Thus, differences between individuals in accrued household ambient greenness and availability of GBS are the focus. As such, we have a hybrid of cross-sectional and longitudinal studies in our framework.

Procedures

Health and ambient greenness (EVI) data were available from Jan 1, 2008 to Oct 31, 2019. The cohort included everyone aged 16 years or more and registered with a GP providing patient records to the SAIL Databank during the same period. People entered the dynamic cohort each quarter as they either reached 16 years of age or moved to Wales. We excluded from the study sample those not registered with an appropriate GP, those without a Welsh residential address between January, 2008 and October, 2019, those without their sex or week of birth recorded, or those with a CMD recorded in the first cohort quarter.³²

Statistical analysis

The cohort contained 2 341 591 adults and 19 141 896 person-years of follow-up data. We used multivariate logistic regression to assess associations between normalised time-aggregated ambient greenness (average EVI within a 300 m buffer from home), and access measures (total number of GBS, or distance to nearest GBS, within 1600 m of the home), with having a subsequent CMD. We stratified by deprivation and historical CMD diagnosis (pre-cohort entry) to assess effect modification. We normalised EVI and GBS access to between 0 and 1. Regression results are presented for increments of 0.1 units. In our regression analyses, we adjusted for rurality when investigating associations between ambient greenness and CMD. We did not adjust for rurality when investigating associations between GBS access and CMD because the spaces that characterise rural areas, such as farmland, which is not accessible to the public, were excluded from the overall GBS measure. Predicted probabilities were calculated from the adjusted regression models to illustrate how the probability of CMD varied with differences in GBS exposure or access, keeping all other variables constant.

Additional sensitivity analyses examined associations between additional normalised time-aggregated access measures (distance to nearest GBS and average distance to GBS, both within 1600 m of the home) and the

likelihood of having a subsequent CMD. We also examined associations for a subgroup with a historical CMD diagnosis.

Role of the funding source

The funder of the study had no role in study design, data collection, data analysis, data interpretation, or writing of the report, or the decision to submit for publication.

	Adults		Common mental health disorder*		Ambient greenness		Potential to access GBS: number of GBS	
	n	%	n	%	Mean	SD	Mean	SD
Total	2 341 591	100%	513 239	21.9%	0.29	0.09	441.58	340.72
Age group, years								
16–21	363 314	15.5%	70 282	19.3%	0.30	0.10	491.82	392.31
22–30	385 643	16.5%	102 992	26.7%	0.26	0.09	523.48	408.53
31–40	327 874	14.0%	87 550	26.7%	0.27	0.09	453.19	332.24
41–50	338 303	14.4%	88 904	26.3%	0.29	0.09	412.64	298.63
51–60	302 774	12.9%	67 545	22.3%	0.30	0.09	401.53	296.20
61–70	284 096	12.1%	47 105	16.6%	0.30	0.09	382.49	285.34
71–80	201 279	8.6%	30 401	15.1%	0.30	0.09	395.23	290.27
>80	138 308	5.9%	18 460	13.3%	0.28	0.09	401.08	301.52
Sex								
Male	1 193 240	51.0%	205 546	17.2%	0.29	0.09	440.58	337.83
Female	1 148 351	49.0%	307 693	26.8%	0.29	0.09	442.62	343.69
Birth in household								
No	2 076 801	88.7%	460 262	22.2%	..	..	..	..
Yes	264 790	11.3%	52 977	20.0%	..	..	..	..
Death in household								
No	2 151 488	91.9%	489 243	22.7%	..	..	..	..
Yes	190 103	8.1%	23 996	12.6%	..	..	..	..
WIMD quintile								
1—most deprived	473 404	20.2%	131 843	27.8%	0.25	0.08	495.13	253.75
2	462 492	19.8%	110 898	24.0%	0.27	0.08	443.93	291.10
3	480 278	20.5%	98 673	20.5%	0.30	0.10	413.21	347.62
4	445 002	19.0%	83 768	18.8%	0.31	0.11	405.72	401.33
5—least deprived	480 415	20.5%	88 057	18.3%	0.29	0.08	448.14	382.03
Moved home								
Did not move	1 439 204	61.5%	343 734	23.9%	0.29	0.10	446.32	334.40
Moved once	520 509	22.2%	99 694	19.2%	0.29	0.10	432.63	360.11
Moved more than once	381 878	16.3%	69 811	18.3%	0.28	0.09	435.91	335.67
Rurality								
Urban	1 611 516	68.8%	365 931	22.7%	0.25	0.07	554.64	346.99
Rural	354 961	15.2%	62 285	17.5%	0.41	0.09	162.60	115.21
Town and fringe	375 114	16.0%	85 023	22.7%	0.31	0.07	219.84	130.79

Ambient greenness is the annual mean EVI within 300 m of each household location. Number of GBS is the count of GBS within 1600 m of each household location using a network model. For those who moved home during the study period, these measures are averages including exposures at each location. EVI=Enhanced Vegetation Index. GBS=green and blue spaces. WIMD=Welsh Index of Multiple Deprivation. *Common mental health disorder in the National Health Service general practitioner record, updated quarterly during follow-up—see Methods section for details. Births/deaths in households were those occurring during follow-up.

Table 2: Characteristics of cohort members including GBS exposure

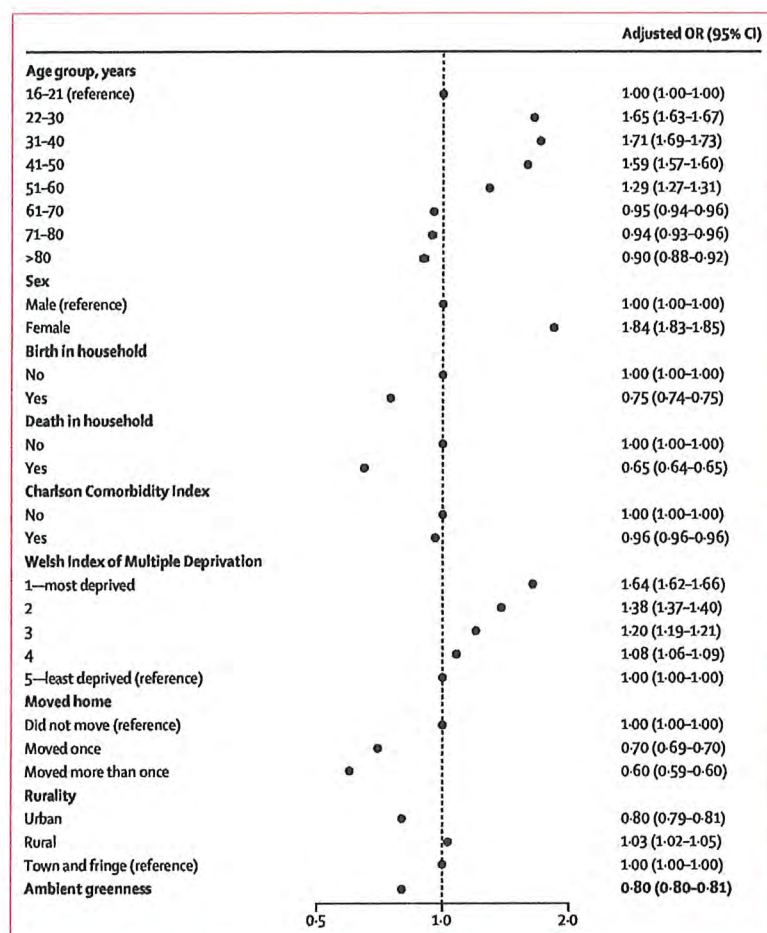


Figure 1: Factors associated with risk of CMD, including mean ambient greenness
CMD=common mental health disorders. OR=odds ratio. Association with CMD is after adjustment for other variables listed. The results in each category of each factor show the adjusted OR of CMD compared to the reference category of that factor.

Results

Within the cohort, 1193 240 (51.0%) adults were men and 1148 351 (49.0%) were women. 513 239 (21.9%) had a CMD at least once during their time in the cohort (table 2). A higher proportion of women than men had a CMD (307 693 [26.8%] women vs 205 546 [17.2%] men; table 2), and younger people (aged 22–50 years) were more likely to have sought care for a CMD than those in older age groups (102 992 [26.7%] of those aged 22–30, 87 550 [26.7%] of those aged 31–40, and 88 904 [26.3%] of those aged 41–50, vs 47 105 [16.6%] for those aged 61–70 years; table 2). Ambient greenness within 300 m of a home in Wales between 2008 and 2019 was in the range 0.10–0.62 (non-normalised mean EVI values).

After adjustment for age, sex, area-level deprivation, individual mobility, births and deaths in the household, and comorbidities, a 0.1-unit greater EVI, representing ambient greenness around the home, was associated with lower odds of having a CMD (adjusted odds ratio [OR]

0.80, 95% CI 0.80–0.81; figure 1). There were even lower odds of CMD among adults with a historical CMD diagnosis (recorded up to 8 years before 2008; adjusted OR 0.68, 0.68–0.68) than among those without (0.84, 0.84–0.85; table 3). Potential access to GBS followed a similar pattern to ambient greenness, although the magnitude of the effect was smaller; a 0.1-unit greater number of GBS of any size within 1600 m of the home (equivalent to 236 more GBS) was associated with lower odds of CMD (0.93, 0.93–0.93; figure 2). Unlike for EVI, a 0.1-unit greater number of GBS was only associated with lower odds of a CMD among those without a historical CMD (0.91, 0.91–0.92; table 3). For those with a historical CMD, there was no association between GBS access and likelihood of subsequent CMD (1.00, 0.99–1.00; table 3).

We stratified by deprivation, finding that ambient greenness and access to GBS were both associated with CMD across all area-level deprivation quintiles (table 3). We did not find a modifying effect of deprivation for increasing ambient greenness; there was no clear trend in the magnitude of association between ambient greenness and CMD with increasing deprivation categories (table 3). However, the association between access to GBS and CMD was modified by increasing deprivation. The magnitude of association between a 0.1 unit increase in GBS (equivalent to 236 more GBS) and CMD was greater in the most deprived areas (0.90, 0.90–0.91) than in the least deprived areas (0.94, 0.94–0.95; table 3).

We also stratified by moving home, finding that ambient greenness was associated with lower odds of a CMD in all moving home groups but that the effect was strongest for those who did not move (0.77, 0.77–0.78) compared with those who moved (moved once: 0.86, 0.86–0.87; moved more than once: 0.92, 0.91–0.93; table 3).

In sensitivity analyses, further distance from home to GBS, representing reduced potential access, was associated with greater odds of a CMD. Each additional 360 m (0.1 units) to the nearest GBS was associated with higher odds of having a CMD (1.05, 1.04–1.05; appendix pp 7–8). For the average distance to a GBS, each additional 625 m (0.1 units) was also associated with higher odds of a CMD (1.02, 1.01–1.03; appendix pp 7–8).

In our study, ambient greenness was calculated from normalised EVI exposure values and ranged from 0.25 to 0.80. We used predicted probabilities to illustrate that there was approximately 30% lower probability of a CMD at the bottom of this range compared with the top. Once normalised, GBS access values ranged from 0 to 0.55. There was a prediction of approximately 10% lower CMD probability at the bottom of this range compared with the top (appendix pp 9–10).

Discussion

Based on an analysis of comprehensive data from all adults registered with a GP in the SAIL Databank, more ambient greenness around the home and greater

potential access to GBS were both separately associated with a reduced likelihood of subsequently having a CMD. Stratification by deprivation showed that the association of CMD odds with potential GBS access for adults living in the most deprived areas (10% reduction per 0.1-unit increase) was stronger than for those living in the least deprived areas (6% reduction), indicating the greatest benefits to mental health for people living in deprived areas with more GBS (adjusted OR for most deprived areas 0.90, 95% CI 0.90–0.91; for least deprived areas 0.94, 0.94–0.95). Our findings advance previous research, by showing that deprivation modifies the relationship between GBS and mental health, with the potential to reduce health inequalities.⁹ Mechanisms for greater mental health benefits of GBS among those living in more deprived areas might vary and be multiple. Mechanisms could include deprivation contributing to stress and mental health, and allowing a greater potential benefit of GBS for those living in more deprived areas. Local neighbourhood conditions might be more important for those in more deprived circumstances, who have fewer financial resources available to enable them to travel to spend recreational time outside their local environment than people in less deprived circumstances.

This study has several strengths. The cohort is subject to minimal attrition due to the inclusion of all adults registered with a GP service that is free at the point of use (unless they have opted out from having their data used for research purposes). By using routine data, we reduced selection, participation, and recall bias, resulting in more than 19 million person-years of follow-up. By ensuring that exposures preceded outcomes, we reduced the potential for reverse causality, which has only previously been possible in a small number of GBS mental health studies.³³

Household-level metrics of ambient greenness exposure and potential access to GBS were derived and linked at a granular spatial resolution, thereby reducing spatial smoothing and ecological fallacy. These occur when data are aggregated over larger statistical areas and can introduce biases to the extent that the direction of associations are reversed. We used data linkage to nest people in their homes and to capture their immediate environment centred on their home. Our privacy-protecting data linkage mechanisms made it possible to link health and environment data at the same spatial and temporal scales, enabling a more robust exploration of the longitudinal effect of changing environments on health.^{20,29,30} Over a long duration, place-based improvements might displace the original population. The results of place-based intervention studies investigating area-level health effects might have recorded health outcomes of a different, healthier population. Organisations holding health outcome data should make available anonymised individual-level and household-level data to enable researchers to consider the effects of gentrification. Gentrification might increase health

	Proportion of cohort	Ambient greenness	Potential to access GBS: number of GBS
WIMD			
1—most deprived	20.2%	0.86 (0.85–0.87)	0.90 (0.90–0.91)
2	19.8%	0.78 (0.78–0.79)	0.92 (0.92–0.93)
3	20.5%	0.77 (0.77–0.78)	0.94 (0.94–0.95)
4	19.0%	0.83 (0.82–0.83)	0.93 (0.92–0.93)
5—least deprived	20.5%	0.77 (0.77–0.78)	0.94 (0.94–0.95)
CMD			
Validated prediction of historical CMD	10.1%	0.68 (0.68–0.68)	1.00 (0.99–1.00)
No record of validated prediction of historical CMD	89.9%	0.84 (0.84–0.85)	0.91 (0.91–0.92)
Moved home			
Did not move	61.5%	0.77 (0.77–0.78)	0.94 (0.93–0.94)
Moved once	16.3%	0.86 (0.86–0.87)	0.91 (0.91–0.92)
Moved more than once	22.2%	0.92 (0.91–0.93)	0.89 (0.89–0.90)

Data are % or adjusted OR (95% CI). Models were adjusted for age, sex, birth or death in household during follow-up, Charlson Comorbidity Index, and moving home. Adjusted OR is for a 0.1-unit increase in ambient greenness or number of GBS. Ambient greenness is the annual mean EVI within 300 m of each household location. Number of GBS is the count of GBS within 1600 m of each household location using a network model. CMD=common mental health disorder. EVI=Enhanced Vegetation Index. GBS=green and blue spaces. OR=odds ratio. WIMD=Welsh Index of Multiple Deprivation.

Table 3: Associations of mean ambient greenness and number of GBS with CMD, stratified by area-level deprivation and historical CMD

inequities by displacing less affluent residents, or through changing social environments that lead to an area becoming accessible only for people from more privileged social backgrounds.³⁴ Here, we took an important step to disentangle the mental health benefits of GBS while taking into account individual mobility by anonymously tracking individual residential exposure over time, instead of measuring green space exposure across small areas at a single time point.⁷ This reduces the potential for exposure misclassification and subsequent bias that might occur in various other study types, including prospective cohort studies.³⁵ Using time-varying exposures rather than consistently allocated intervention and control groups makes translating our results into policy more challenging, but also more reflective of the lived realities policies seek to influence.

We used a validated algorithm with high specificity and positive predictive value for detecting CMD (anxiety and depression) from GP data, and including historical diagnoses with current treatment and symptoms increased the measure's sensitivity. Nevertheless, we might still be missing about a third of true cases of CMD.³⁶ We were limited by the insufficient detail captured on CMD case severity, and we were unable to stratify between anxiety and depression. It is plausible that CMD symptom severity might differ between those who seek help in general practice and those who do not; the CMD algorithm might be insufficiently sensitive to capture less severe symptoms. It is also plausible that less severe symptoms might be more amenable to treatment or prevention from exposure to ambient

For more on SAIL data see <https://saildatabank.com/faq>

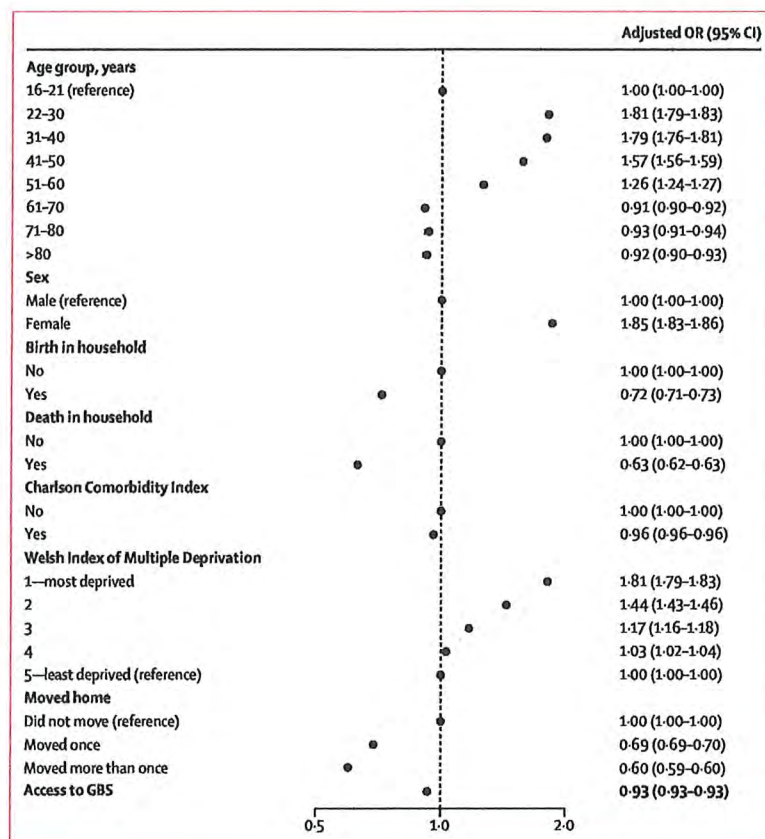


Figure 2: Factors associated with risk of CMD, including access to GBS

We did not adjust for rurality for GBS access because the spaces characterising rural areas, such as farmland, were not included in the access measures. Each 0.1-unit increase in GBS was an additional 236 spaces. CMD=common mental health disorders. GBS=green and blue spaces. OR=odds ratio. Association with CMD is after adjustment for all other variables listed.

greenness or access to GBS around the home than the CMD that were captured by the algorithm. If milder CMD symptoms are more likely to respond positively to GBS, but those with these milder symptoms are less likely to seek care in general practice, this could have diluted associations between change in GBS and milder CMD in our study. Cognitive behavioural therapies and other non-medication treatments were not included in our CMD case definition as this information is not available in the Welsh Longitudinal General Practice dataset. Low sensitivity and insufficient data on non-drug treatments might have reduced the number of cases of CMD we were able to identify, with associated reductions in the precision of estimates. This might also affect the ability of electronic health record algorithms to capture changes in numbers of those seeking help for CMD over time, because referrals to talking therapies are increasing.³⁷

We uncovered temporal limitations in the high-quality spatial data. We set out to generate quarterly exposures of ambient greenness and annual GBS

access but were only able to derive annual EVI due to cloud cover, and a single measure of GBS access for 2018, due to inconsistent temporal updates and changes to land use classification in the map data. However, we did capture temporal variations in GBS access for people who moved home. We believe the specificity of capturing changes in greenspace through moving home contributed to finding that cohort members had 20% lower odds of CMD for greater exposure to ambient greenness and 7% lower odds for an increase in GBS access, despite having only annual exposure updates for the rest of the population. There are numerous ways in which ambient greenness can be measured; although the options for a temporally consistent exposure metric for this study were constrained, the choice of measure might have had an influence on the observed relationship. Finally, we adjusted associations for the Welsh Index of Multiple Deprivation, a measure of deprivation assessed in small geographical areas, and for moving (a proxy for stability) and the association between GBS and CMD outcome remained. While residual confounding might have remained, we did not have access (through routinely collected data) to more detailed measures of individual-level or household-level stability or economic resources.

Our results indicate that the relationships between ambient greenness or access to GBS and CMD likelihood are modified by an individual's CMD history, although in opposite directions for the two types of GBS metric. For those with historical CMD before entering the cohort (defined as historical diagnoses in the GP dataset in the 8 years before the current cohort began), exposure to greater ambient greenness was associated with lower risk of a future CMD than for those without a history of previous CMD. This suggests that exposure to ambient greenness might be important for CMD prevention in addition to providing restorative benefits and is a potentially important point for reducing mental health inequality. In contrast, greater potential access to GBS was associated with mental health improvements for those without a history of CMD. This might reflect the different mechanisms through which ambient greenness, or access to GBS, are hypothesised to affect mental health.^{38,39} It would be useful to understand how people who have current CMD symptoms might use these spaces for recovery rather than for prevention.⁴⁰

Ambient greenness and GBS exposures are important, and the relationships are complex and potentially differ depending on multiple factors, including the population group (eg, elderly, marginalised, physically frail) and life circumstances (eg, retired). We adjusted our analyses for age group, but there is likely to be residual confounding that might not neatly correspond to age group. Evidence suggests that ambient greenness and access to GBS are not the only elements of GBS that affect health; qualities of GBS, such as benches, lighting, or perceived safety,

References

- 1 Vigo D, Jones L, Atun R, Thornicroft G. The true global disease burden of mental illness: still elusive. *Lancet Psychiatry* 2022; 9: 98–100.
- 2 Wheeler BW, Lovell R, Higgins SL, et al. Beyond greenspace: an ecological study of population general health and indicators of natural environment type and quality. *Int J Health Geogr* 2015; 14: 1–17.
- 3 Houlden V, Weich S, de Albuquerque JP, Jarvis S, Rees K. The relationship between greenspace and the mental wellbeing of adults: a systematic review. *PLoS One* 2018; published online Sept 12. <https://doi.org/10.1371/journal.pone.0203000>.
- 4 Kivimäki M, Batty GD, Pentti J, et al. Modifications to residential neighbourhood characteristics and risk of 79 common health conditions: a prospective cohort study. *Lancet Public Health* 2021; 6: e396–407.
- 5 van den Berg M, Wendel-Vos W, van Poppel M, Kemper H, van Mechelen W, Maas J. Health benefits of green spaces in the living environment: a systematic review of epidemiological studies. *Urban For Urban Green* 2015; 14: 806–16.
- 6 Boyd F, White MP, Bell SL, Burt J. Who doesn't visit natural environments for recreation and why: a population representative analysis of spatial, individual and temporal factors among adults in England. *Landsc Urban Plan* 2018; 175: 102–13.
- 7 Gibbons J, Barton M, Brault B. Evaluating gentrification's relation to neighborhood and city health. *PLoS One* 2018; 13: e0207432.
- 8 Garrett JK, Clithrow TJ, White MP, Wheeler BW, Fleming LE. Coastal proximity and mental health among urban adults in England: the moderating effect of household income. *Health Place* 2019; 59: 102200.
- 9 Mitchell RJ, Richardson EA, Shortt NK, Pearce JR. Neighborhood environments and socioeconomic inequalities in mental well-being. *Am J Prev Med* 2015; 49: 80–84.
- 10 Fuertes E, Markevych I, Thomas R, et al. Residential greenspace and lung function up to 24 years of age: the ALSPAC birth cohort. *Environ Int* 2020; 140: 105749.
- 11 Pearce J, Cherrie M, Shortt N, Deary I, Ward Thompson C. Life course of place: a longitudinal study of mental health and place. *Trans Inst Br Geogr* 2018; 43: 555–72.
- 12 Garrett JK, Rowney FM, White MP, et al. Visiting nature is associated with lower socioeconomic inequalities in well-being in Wales. *Sci Rep* 2023; 13: 9684.
- 13 Alcock I, White MP, Wheeler BW, Fleming LE, Depledge MH. Longitudinal effects on mental health of moving to greener and less green urban areas. *Environ Sci Technol* 2014; 48: 1247–55.
- 14 White MP, Alcock I, Wheeler BW, Depledge MH. Would you be happier living in a greener urban area? A fixed-effects analysis of panel data. *Psychol Sci* 2013; 24: 920–28.
- 15 Ward Thompson C, Silveirinha de Oliveira E, Tilley S, et al. Health impacts of environmental and social interventions designed to increase deprived communities' access to urban woodlands: a mixed-methods study. 2019. <https://www.ncbi.nlm.nih.gov/books/NBK535742/> (accessed June 6, 2022).
- 16 Collins RM, Spake R, Brown KA, Ogutu BO, Smith D, Eigenbrod F. A systematic map of research exploring the effect of greenspace on mental health. *Landsc Urban Plan* 2020; 201: 103823.
- 17 Kuo FE, Sullivan WC. Environment and crime in the inner city: does vegetation reduce crime? *Environ Behav* 2001; 33: 343–67.
- 18 Geneshka M, Coventry P, Cruz J, Gilbody S. Relationship between green and blue spaces with mental and physical health: a systematic review of longitudinal observational studies. *Int J Environ Res Public Health* 2021; 18: 9010.
- 19 Fecht D, Garwood K, Butters O, et al. Automation of cleaning and reconstructing residential address histories to assign environmental exposures in longitudinal studies. *Int J Epidemiol* 2020; 49: i49–56.
- 20 Rodgers SE, Dermmler JC, Dsilva R, Lyons RA. Protecting health data privacy while using residence-based environment and demographic data. *Health Place* 2012; 18: 209–17.
- 21 Lyons RA, Jones KH, John G, et al. The SAIL databank: linking multiple health and social care datasets. *BMC Med Inform Decis Mak* 2009; 9: 3.
- 22 Office for National Statistics. 2011 rural/urban classification. 2011. <https://www.ons.gov.uk/methodology/geography/geographicalproducts/ruralurbanclassifications/2011ruralurbanclassification> (accessed Nov 1, 2021).
- 23 Rokni K, Musa TA. Normalized difference vegetation change index: a technique for detecting vegetation changes using Landsat imagery. *CATENA* 2019; 178: 59–63.
- 24 Young NE, Anderson RS, Chignell SM, Vorster AG, Lawrence R, Evangelista PH. A survival guide to Landsat preprocessing. *Ecology* 2017; 98: 920–32.
- 25 i.vi GRASS GIS manual. <https://grass.osgeo.org/grass78/manuals/i.vi.html> (accessed April 2, 2020).
- 26 Cloud Masking—Qgis plugin. <https://smbyc.bitbucket.io/qgisplugins/cloudmasking/> (accessed April 2, 2020).
- 27 UK Government. Monitor of Engagement with the Natural Environment (MENE). 2014. <https://www.gov.uk/government/collections/monitor-of-engagement-with-the-natural-environment-survey-purpose-and-results> (accessed July 2, 2021).
- 28 Mizen A, Song J, Fry R, et al. Longitudinal access and exposure to green-blue spaces and individual-level mental health and well-being: protocol for a longitudinal, population-wide record-linked natural experiment. *BMJ Open* 2019; 9: 1–10.
- 29 Rodgers SE, Lyons RA, Dsilva R, et al. Residential Anonymous Linking Fields (RALFs): a novel information infrastructure to study the interaction between the environment and individuals' health. *J Public Health* 2009; 31: 582–88.
- 30 Johnson RD, Griffiths LJ, Hollinghurst JP, et al. Deriving household composition using population-scale electronic health record data—a reproducible methodology. *PLoS One* 2021; 16: e0248195.
- 31 Welsh Government. Welsh Index of Multiple Deprivation. 2014. <https://gov.wales/welsh-index-multiple-deprivation> (accessed Nov 8, 2021).
- 32 Thompson DA, Geary RS, Rowney FM, et al. Cohort profile: the Green and Blue Spaces (GBS) and mental health in Wales e-cohort. *Int J Epidemiol* 2022; 51: e285–94.
- 33 Houlden V, Weich S, de Albuquerque JP, Jarvis S, Rees K. The relationship between greenspace and the mental wellbeing of adults: a systematic review. *PLoS One* 2018; published online Sept 12. <https://doi.org/10.1371/journal.pone.0203000>.
- 34 Cole HVS, Lamarca MG, Connolly JJT, Anguelovski I. Are green cities healthy and equitable? Unpacking the relationship between health, green space and gentrification. *J Epidemiol Community Health* 2017; 71: 1118–21.
- 35 Medgyesi DN, Fisher JA, Cervi MM, et al. Impact of residential mobility on estimated environmental exposures in a prospective cohort of older women. *Environ Epidemiol* 2020; 4: e110.
- 36 John A, McGregor J, Fone D, et al. Case-finding for common mental disorders of anxiety and depression in primary care: an external validation of routinely collected data. *BMC Med Inform Decis Mak* 2016; 16: 35.
- 37 Nuffield Trust. Improving Access to Psychological Therapies (IAPT) programme. 2018. <https://www.nuffieldtrust.org.uk/resource/improving-access-to-psychological-therapies-iapt-programme> (accessed Oct 19, 2021).
- 38 Markevych I, Schoierer J, Hartig T, et al. Exploring pathways linking greenspace to health: theoretical and methodological guidance. *Environ Res* 2017; 158: 301–17.
- 39 Holland I, DeVille NV, Browning MHEM, et al. Measuring nature contact: a narrative review. *Int J Environ Res Public Health* 2021; 18: 4092.
- 40 Tester-Jones M, White MP, Elliott LR, et al. Results from an 18 country cross-sectional study examining experiences of nature for people with common mental health disorders. *Sci Rep* 2020; 10: 19408.
- 41 Cohen DA, Han B, Isacoff J, et al. Impact of park renovations on park use and park-based physical activity. *J Phys Act Health* 2015; 12: 289–95.
- 42 Weimann H, Rylander L, van den Bosch MA, et al. Perception of safety is a prerequisite for the association between neighbourhood green qualities and physical activity: results from a cross-sectional study in Sweden. *Health Place* 2017; 45: 124–30.
- 43 Geary RS, Wheeler B, Lovell R, Jepson R, Hunter R, Rodgers S. A call to action: improving urban green spaces to reduce health inequalities exacerbated by COVID-19. *Prev Med* 2021; 145: 106425.
- 44 Lyons RA, Ford DV, Moore L, Rodgers SE. Use of data linkage to measure the population health effect of non-health-care interventions. *Lancet* 2014; 383: 1517–19.

can affect GBS use and thus health outcomes that require activity in a space.^{41,42} Authorities responsible for designing and maintaining GBS have an opportunity to engage with seldom heard groups to ensure GBS are not only distributed equitably but also meet the satisfaction and needs of residents.

Although the study period for this research preceded the COVID-19 pandemic, the need for GBS to access or view was brought to the fore during the early stages of the pandemic, particularly for those living in urban areas with poor or no access to private or communal garden spaces. Our results suggest that investing in improved ambient greenness, as well as making public GBS accessible, might lead to future mental health benefits for adults with and without a history of CMD. There might also be additional co-benefits: job or food creation, biodiversity promotion, and flood prevention or carbon sequestration. Realising these requires a shift in the balance of decision making to place weight on protecting, enhancing, and providing more appropriate GBS designed for local communities. Urban GBS can therefore be thought of as a public health and social investment, providing a chance to rebalance our relationship with nature, to help address our climate change challenges, and to protect against the mental health challenges of future pandemics.⁴³

We have generated environmental health equity evidence that is important for policy and practice in the long-term prevention of common mental health disorders. This evidence would have otherwise been intractable to generate without using routinely collected environmental and health data and systems to dynamically link individuals into households and so to their changing environmental exposures.⁴⁴ It is challenging to convince governments to invest in preventative strategies that take decades to come to fruition. Here we provide evidence of the need for facilities to improve the health and wellbeing of all adults, especially those living in the most deprived areas. The burden of health care for this portion of our population, and on health-care systems to provide preventative treatments, could be reduced through the enhancement of our built environments by including appropriate GBS. Linking data on individuals and households across different organisations is essential as part of a population health management strategy to understand how we might alter the wider determinants of health to most effectively spend across local government and health care to promote public mental health.

Contributors

All authors made substantial contributions to the conception or design of the work; the acquisition, analysis, or interpretation of data; and drafting the manuscript or revising it critically for important intellectual content. All authors provided final approval for publication. RSG contributed to the interpretation of data analyses, and the writing and preparation of the manuscript. DTH led the cohort preparation, data linkage for environmental and health data, and final execution of the cohort for this

study; implemented the design, descriptive, and exploratory data analyses; prepared all the tables; and contributed to the writing of the final manuscript. AM led the design, data acquisition, data preparation, and execution of the GBS metrics for the study; led the development of the typology of GBS; and contributed to the interpretation of data analyses and the final manuscript. AA contributed to the design of data workflows and the final manuscript. JKG, GS, SCP, and DTs contributed to the interpretation of data analyses and to the final manuscript. FMR contributed to interpretation of data analyses, the literature review, and the final manuscript. AW oversaw the statistical analyses and contributed to the design and interpretation of data analyses and the final manuscript. RAL contributed to the design of the study and use of the record-linked data sets used in the project and the final manuscript. RL led on public and policy engagement and contributed to the interpretation of data analyses and policy impact and the final manuscript. MN, JW, and MPW contributed to the design and interpretation of data analyses and the final manuscript. JS led the initial data preparation and contributed to the final manuscript. SW contributed to the interpretation of data analyses and policy impact and the final manuscript. BWW contributed to the design of the study and interpretation of data analyses, and the final manuscript. RF oversaw the preparation of the GBS exposure metrics and contributed to the design of the study and interpretation of data analyses, and to the final manuscript. SER led the design and execution of the study, and oversaw study analyses and the preparation of the final manuscript. DTH, JKG, FMR, and AW had access to the raw health data; AM and RF had access to the raw geospatial data; and all other authors had access to the summary data. The senior statistician (AW) had full access to all the data and the corresponding author (SER) had final responsibility for the decision to submit for publication.

Data sharing

The data for this cohort are stored and maintained in the SAIL Databank at Swansea University. This is a controlled access cohort; all proposals to use SAIL data are subject to review by an independent information governance review panel. Where access is granted, it is gained through a privacy-protecting safe haven and remote access system (SAIL Gateway). The cohort data will be available for collaborative research projects after 2023. For further details about accessing the cohort, contact saildatabank.com or Sarah E Rodgers (arcnwc@liverpool.ac.uk) to discuss working with the original cohort developers.

Declaration of interests

RSG reports a grant from the UK Prevention Research Partnership (MR/V049704/1). JKG reports grants from EU Horizon 2020 (666773, 821016, 776866). MPW reports royalties from Greenkeeper. RL reports grants from the UK Department for Environment, Food & Rural Affairs (BE0155), the South West Partnership for Environmental and Economic Prosperity (subproject of NE/P011217/1), EU Horizon 2020 (821016), the Wellcome Trust, the Economic and Social Research Council, the UK Department of Health and Social Care, the UK Ministry of Housing, Communities & Local Government (BE0191), and the Medical Research Council (MR/V049704/1); participation as an advisory board member on non-NIHR-funded studies; and royalties from Greenkeeper. AW reports membership of the Health and Social Care Delivery Research Funding Committee 2018–2021 and the Health and Social Care Delivery Research Funding Committee (Bevan) 2020. AA reports grants from Health Data Research UK (HDR-9006) and the Economic and Social Research Council (ES/S007393/1). BWW reports grants from Innovate UK (TS/R013136/1), EU Horizon 2020, the South West Partnership for Environmental and Economic Prosperity, the Wellcome Trust (216035/Z/19/Z), and the UK Prevention Research Partnership (MR/V049704/1); and royalties from Greenkeeper. RAL reports grants from Health Data Research UK (HDR-9006). SER reports grants from the UK Prevention Research Partnership (MR/V049704/1); and membership of the Public Health Research Funding Board 2019–2023. All other authors declare no competing interests.

Acknowledgments

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SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

Rec'd 30/10/23

5814.

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: S. Wastney Full Name: Address: Telephone: (03) 548 7021 Email:
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- ☒ **I could not** obtain an advantage in trade competition through this Submission.
☐ **I wish** to be heard in support of my Submission at the Council Hearing.

I OPPOSE the Plan Change; and particularly the following

1. the creation of a High Density Residential Zone (HDZ), that has a max height greater than 12 m, as it is not mandated under NPS-UD 2020
2. the loss of the existing protection for sunlight to all properties, because it is critical component of residential amenity in a City as it provides warmth and energy efficiency.
3. The omission of any requirement to provide carparks in any new development

I SEEK the following decision from the Council

1. rear and Side Yard Setback of not less than 1.5 metres
2. an amendment to ensure that at least one car park is provided for each residential Unit in the areas presently proposed to be re zoned
3. That Council will prioritise Housing growth and intensification within the Inner City, before the current residential zones;

I REQUEST that Council appoints an independent Panel to hear the Submissions; and gives a further Notice extending the Closing Date for Submissions

I ACKNOWLEDGE that I have found it extremely difficult to digest the total effect of the proposed PC 29 and its supporting documentation of over 2,000 pages,

Other comments or concerns I have about Plan Change 29

I do not think that these multi-storey buildings should be built without consent or agreement from neighbours or other affected parties.

Suggestion for how Nelson could solve it's "so called" housing crisis

Intensify accomodation in the inner city area.

I acknowledge that my name and address are required to be made publicly available

S. Wastney

Submitter

30.10.23

Date

NB: TO BE DELIVERED TO NCC OR SENT TO environmental.planning@ncc.govt.nz by 4.00 pm

Tuesday 19th September

NDOCS 539570224-17949

Received: 27/10/23

5815

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

TO:
Senior Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
NELSON 7040

Submitter:
Full Name: *Janise Elsie Soomer*
Address:

Telephone:
Email: *JANANDROGER@XTRA.CO.NZ*

I do not obtain an advantage in trade competition through this Submission

~~I wish to be heard in support of my Submission at the Council Hearing~~

I OPPOSE the Plan Change; and particularly the following

1. the creation of a High Density Residential Zone (HDZ), that has a max height greater than 12m, as it is not mandated under NPS-UD 2020
2. the loss of the existing protection for sunlight to all properties, because it is a critical component of residential amenity in a city as it provides warmth and energy efficiency
3. The omission of any requirement to provide carparks in any new development

I SEEK the following decision from the Council

1. rear and side yard setback of not less than 1.5 metres
2. an amendment to ensure one car park is provided for each residential Unit in the areas presently proposed to be re zoned
3. that Council will prioritise housing growth and intensification within the inner City, before the current residential zones.

I 100% reject Plan change 29 in its entirety – but if it is not rejected then I would like to request the following change

I ask for the Council to remove the block of Domett Street/ Hardy Street/ Tasman Street and Nile Street from Plan 29 High Density Residential Zone (HDZ) and it be given the same classification as the other half of Domett Street/Bridge St block or The Wood area of Residential – Comprehensive Area/Residential Lower Density Area. This area should be removed due to the potential of flooding from the Maitai River and Brook Stream. This area should also be removed because the fault line is going through the middle of the block together with the whole block being in a liquefaction zone.

I ask that the Council complete further investigations into the flood hazard risks as I understand Tim Bayley of 52 Domett Street has shown that there is a large discrepancy in Tonkin and Taylors flood map overlay – Tonkin and Taylors report has been used as the basis of plan 29 and could be misleading to Nelson residents if it is found to be inaccurate.

It should be noted that after a report by Tonkin and Taylor, showing possible flooding from the Brook Stream the Kainga Ora development at 107 Nile St has been made to lift it's buildings 700 mm above ground. This flood report was not shown on any Plan29 flood overlay maps.

For further in-depth information please refer to our neighbourhood group submission.

Other comments or concerns I have about Plan Change 29

CONCERNED THAT OBLIVIOUS AREAS OF THE CITY CENTRE AND CITY FRINGE ARE NOT BEING USED FOR HIGH DENSITY HOUSING AHEAD OF ESTABLISHED RESIDENTIAL AREAS.

Suggestion for how Nelson could solve it's 'so called' housing crisis

TARGET UNDER UTILISED LAND IN THE CITY CENTRE AND CITY FRINGE

I acknowledge that my name and address are required to be made publicly available

Submitter signature

Date *25-10-23*

to be delivered or emailed to environmental.planning@ncc.govt.nz by 4pm 31/10/2023

NDOCS-5395 70224-17951

RMA Submission Form for Publicly Notified Plan Change 29



Return your submission by 4pm on
Tuesday 31 October 2023 to:

Senior Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
Nelson 7040

(Hand delivery or courier to: Ground Floor, Civic House, 110 Trafalgar Street,
Nelson 7010 or email to: environmental.planning@ncc.govt.nz with plan
change no.29 in the subject line)

OFFICE USE
Submission No: 8816
Date Received Stamp: 31/10/23
NDOCs No: 539570224-17952

*Required

Submitter Details

Full Name*	JOANNA MAE PLOWS		
Organisation			
Contact Person			
Postal address*			
Telephone*		Email*	jo.plows@gmail.com

Trade Competition*

If you are a person who could gain an advantage in trade competition through the submission your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act 1991.

- ☒ I/we could not gain an advantage in trade competition through this submission.
- ☐ I/we could gain an advantage in trade competition through this submission. *if yes, please complete the following:*
- ☐ I/we are directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.
- ☐ I/we are not directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Council Hearing*

- ☐ I/we do not wish to be heard in support of my/our submission.
- ☒ I/we wish to be heard in support of my/our submission. If yes:
- ☐ I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings.

Public information

Please note that your name and address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as council.

Signature of Submitter*

(or person authorised to sign on behalf of submitter - a signature is not required if you make your submission by electronic means)

Date*

31.10.23

RMA Submission Form for Publicly Notified Plan Change 29

The specific provisions of the Proposed Plan Change that my submission relates to are as follows:

- | | |
|--|--|
| ☒ Entire Plan Change | ☐ Papakāinga |
| ☒ Residential | ☐ Transport |
| ☒ Inner City and City Fringe | ☐ Mapping |
| ☐ Industrial | ☒ Infrastructure |
| ☐ Suburban Commercial | ☐ Area outside of Plan Change |
| ☐ Natural Hazards/Climate Change | ☐ Subdivision |
| ☒ Heritage | ☐ Other |

- I/we*: ☐ Oppose the Plan Change in part ☒ Oppose the Plan Change
☐ Support the Plan change in part ☐ Support the Plan Change
☐ Are Neutral about the Plan Change ☒ Request amendments to the Plan Change

My submission is*:

(Include whether you support or oppose the specific provisions or wish to have them amended, and reasons for your views)

Refer to attached submission.
All outlined in there.

RMA Submission Form for Publicly Notified Plan Change 29

I seek the following decision from the Council*:

(Give precise details, where amendments are sought, provide details below of what changes you would like to see).

Refer to attached submission.
All outlined within.

Note:

- 1) This form is only for the purpose of making a submission on Proposed Plan Change 29 to the Nelson Resource Management Plan. It is NOT for making a further submission (i.e., in support or opposition to an original submission) or for making a submission on a resource consent or on Council's Annual Plan.
- 2) It is not mandatory to use either the cover or content sheet of this form, however your submission must be in writing and provide the necessary information as indicated on the form, e.g., what is supported or opposed, the reason why and the decision sought, full contact details, etc.
- 3) Council cannot accept a submission that does not clearly indicate what a submitter wishes Council to do (i.e., Council to make a decision to refuse, amend or accept the Plan Change). Please indicate specific recommendations if amendments are sought. Council also cannot accept a submission that does not relate specifically to the Plan Change. In these cases, the submission may be considered 'Out of Scope' and may not be considered further.
- 4) Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - a. is frivolous or vexatious.
 - b. discloses no reasonable or relevant case.
 - c. would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
 - d. contains offensive language.
 - e. is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

SUBMISSION to the NELSON CITY COUNCIL on PLAN CHANGE 29

From :
Joanna Plows

jo.plows@gmail.com

I wish to speak to my submission.

While I acknowledge the intent of the plan change for benefits of intensification of urban living, I reject PC29 in its entirety but if the RMA goes ahead with this plan, I wish to submit the following points :

Firstly - the Pressured Process.

I have needed to attend meetings about this – not run by council - to hear the important details and consequences of this plan.

After public pressure and at the Public Mtg at Trafalgar Centre on 7 Sept, Mayor Smith stated that “this legislation on urban development is the most important that the council has undertaken”.

He was then challenged by citizens attending, to therefore at least extend the submission time as many other citizens hadn't even yet heard of this proposal.

This should have been realised by council and a longer and fair time frame allowed for submissions.

And the NCC should have been upfront about the negative impacts on existing residents' properties as – listed by Steve Webster in his submission :

- (1) Loss of winter sunlight with new recession planes.
- (2) Loss of on street car parking with increased intensification due to no requirement for on-site car parking.
- (3) Loss of privacy with bigger buildings that are closer to boundaries.
- (4) Loss of property value with loss of views, sunlight, and privacy.
- (5) Increased levels of noise with increased residential dwellings around a boundary.
- (6) Residential unit numbers per building can be increased on a 'restricted discretionary' basis without notification or written approval.
- (7) Exaggerated population forecasts.
- (8) Council voted **NOT** to withdraw PC 29 on Sept 14th Meeting.
- (9) Predetermined biased Councillors on the hearing panel.

- (a) I am asking Council to immediately withdraw PC 29 and get Council Planning staff to refine the plan design and then put it back out for public consultation.

And I oppose the increase of residential units beyond 4, as a restricted discretionary activity that does NOT require notification and written approval from neighbours.

I request that the NCC ensures that more than 4 units requires notification - to restrict large 'out of character' accommodation blocks spanning multiple sections and taking up lots of on-street car parking - popping up in a residential street without warning.

Sunlight

Sunlight is the most important aspect for residents as ranked in the Ranked Preferences of Housing Report commissioned by NCC and TDC in June 2021 for the Future Devpt Strategy.

So this should be the major guiding point in a new plan design – No Loss of Sunlight on neighbouring properties.

Access to Sunlight and Green Space are acknowledged as 2 of the most important requirements for Health and Well-being.

And what is the point of solar panels on concerned citizen's houses – or on other potential in-fill housing/units, if they are shaded by a neighbouring development?

So existing houses built before and under the current daylight rules will be prone to loss of sunlight under PC29 resulting in :

Shading of Green Energy systems; increased costs of heating and damp houses; reduction in property value – most buyers want to know how much sun the house gets; another cost on top of the already burgeoning cost-of-living.

I support retention of the current AP15 Daylight Admission protection rules for all existing properties.

NCC's Forecast of Population Growth

These are misleading as they are not from Statistics NZ and often quoted is the wider Nelson-Tasman regional growth which is outside the focus of PC29.

And those wishing to come and live in Nelson will have to be able to afford the expensive houses or rents.

And has there been any research as to how many dwellings sit empty for long periods? There should be a time cap on these dwellings.

Affordable Housing

Will some of the apartment buildings be able to house those on limited incomes and the homeless?

I request this to be included in the plan.

It is abominable that NZ has people living in tents and cars and motel rooms.

And will apartment buildings have an array of living choices like some in Scandanavia eg units for families, couples and single people. And perhaps a shared laundry and/or kitchen and rooftop garden and recreational area?

This would also help with any 'antisocial' behaviour and not having a number of people experiencing problems all living in the same dwelling and affecting neighbours and community as has sometimes been the experience to date.

Carrying Capacity

With increased housing growth, what is the NCC plan for extra carrying capacity pressure on the city's water, sewerage and storm water infrastructure?

I would like to request a subsidy to encourage citizens to install their own water tanks?

Inner City Intensification

I would only support a High Density Zone here if :

- 1) All current possible in-fill options of lower storey buildings have been investigated and / or there is little or no shading / loss of daylight of existing properties
- 2) Keep industrial businesses on the fringes of the city and the likes of car sale businesses
- 3) Keep and help maintain any Victorian architecture facades. We have already lost many older character buildings in Nelson
- 4) All currently empty CBD top storey areas are designated for conversion to living space as in Europe – which will bring life back to the inner city and security at night time
- 5) Protection for our current inner city trees and more Green planting.

Then City Fringe Intensification.

And lastly Residential Zones – Medium Density – 3 storey 11m high – progressively expanding from the CBD (and central Stoke) if required and providing AP15 Daylight Admission Protection rules remain in force for existing properties.

And taking into account all identified 'Hazard Zones'.

Heritage Status

Needs to be retained and protected.

I believe a number of listed heritage properties, the Inner City Heritage Precinct and the Wakefield Quay Heritage /Character Precinct are deleted from the current register in the Nelson Resource Management Plan as part of PC29.

I request these be reinstated.

This is also an important attraction for tourists who visit.

New development needs to be 'design lead' not 'developer lead' and planned on a 'neighbourhood' basis to keep each neighbourhood's character.

Current modern black houses being built are totally out of character beside an Historic Home.

I do support the inner retro-fitting of older and heritage houses if residents want to divide them into separate living areas.

And the building of 'granny flats' or bedsits on site – with all bathroom and kitchen facilities - to house family members, etc.

Tiny Homes

I support this concept of building and wish to see more support and available land for those choosing this more intensive lifestyle.

Hearing Panel

For 'unbiased public perception', I request that NCC appoint councillors from either side of the Sept 14 vote on Councillor Courtney's proposal to withdraw PC29.

If this is not adhered to, then I request all councillors are replaced with independent Commissioners.

I support the submissions of Steve Webster and Geoffrey Hayes.

Sincerely, Joanna Plows

The Nelson City Council wants your opinion.
Please tell us what you think.

Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.

Office Use Only			
31/10/23		Submission Number S817	
File Ref	S817	INITIALS	

NDOCS:539570224-17953

Name Bruce + Pamela Thomas

Daytime phone 0275488871

Address _____

Organisation represented (if applicable) _____

Do you wish to be heard in support of your submission? ☒ YES ☐ NO # of pages

_____ If you do not tick a box we will assume you do not wish to be heard.

Public information

Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.

The consultation/proposal my submission relates to:

NCC Resource Management Plan change 29

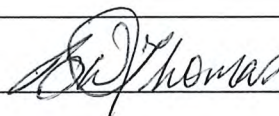
or My submission is:

Two pages attached

Please note have
also put this same
submission individually
in for both Bruce + Pam
Thomas as unsure if
you accept a joint one.

Had a computer glitch at last
minute + couldn't do it online!

Date 31.10.23

Signature Bj Thomas 

Help with making a submission overleaf...

Submission re NCC 'Resource Management Plan Change 29' document, October 2023

Bruce and Pamela Thomas, Jacobsen Cottage, 1
or Bruce mobile 0275488871 / Pam mobile 0277478809

General Comment

We agree that New Zealand's current/future housing challenges nation-wide need to be addressed, but we also hold the view that aspects of Government directives and our local Councils responses as documented to date seem somewhat rushed and require further thought and consideration.

We moved to Nelson in 1975 with a DSIR science team to undertake preliminary studies of South Island beech forest ecology ... research that was sparked by environmental concerns over the then proposed beech forest utilisation scheme. This controversy was succinctly appraised by Graham Searl in his book "Rush to Destruction" published that very year (1975). The scheme went ahead regardless and history records that many of the dire consequences he foretold with regards potential environmental damage came to pass. Those of us living in Nelson at the time remember the huge piles native forest woodchips at the Port ready for export to Japan, simply to create high quality paper for the likes of the glossy magazine industry. In hindsight, was that really a good outcome for New Zealand considering the precious flora and fauna we lost along the way?

Another result of our move to Nelson was the purchase of an old house to make our own. It was well placed and despite having had most of its original character features removed and no knowledge whatever of its past, we have gained much satisfaction in researching its history and physically restoring "**Jacobsen Cottage**" to the state it is in today. We have been privileged to call this piece of Nelson home for the greater part of our lives and what we have achieved has been done for the benefit of future generations. Sadly, during our 47 years of occupation we have witnessed the ongoing needless demolition of numerous similar Nelson dwellings worthy of heritage classification, the rich histories of which are likely never to be recovered now they are gone. We are concerned that the PC 29 proposals could well exacerbate a continuing loss of not only heritage buildings but also the green spaces that remain in the central city (along with the native biodiversity that still inhabit or periodically utilize resources in these relict natural areas).

Jacobsen Cottage is named for JSM Jacobsen, a German settler of considerable character who built and occupied the cottage as family home in circa 1857. The building is currently one of only four cottages built prior to 1860 to receive a NCC Heritage B classification*, but Jacobsen himself warrants recognition for the hugely influential part he played during the early establishment period of Nelson City (B & P Thomas, 1986).

*Ref ; NCC PC29 S52 Report Appendix 3H October 2020

Points to Consider

No 1 In Plan Change 29 it is written “also proposing requiring restricted discretionary resource consent for development above 8m in the Medium Density Residential Zone and the High Density Residential Zone where development adjoins a heritage precinct or a scheduled building, to enable an assessment of effects on the heritage values of the adjoining heritage item.” We support this but would prefer the restriction changed to single story.

No 2 It is of concern to us that the Hearing Panel comprises NCC Counsellors only. We strongly recommend that it be reconfigured to achieve a majority membership of independent, unbiased participants.

No 3 It is imperative that a qualified and experienced conservation architect is involved in reviewing consent applications to ensure that appropriate heritage protection is achieved across all existing heritage zones.

No 4 Include comprehensive neighbourhood design plans for all sites that heritage buildings are located.

No 5 Imperative to have consultation with local architects to achieve quality intensification design.

No 6 Establish an independent regional urban development agency to provide guidance and oversee development across Nelson in a more co-ordinated way, rather than the site by site basis as happens now. “It’s about design-led solutions rather than developer-led solutions” (William Samuels, Nelson Weekly, 11 Oct 2023)

No 7 Reconsider the proposed building heights adjacent to heritage buildings in all existing zones, especially within the High Density Zone.

No 8 We consider the 1m boundary rule should be discretionary in some instances – a ‘one rule covers all’ is not appropriate in some circumstances.

No 9 Take account of topographical landscape when considering resource consent requirements.

No 10 Ensure the proposed plan includes provisions in resource consenting to better protect the integrity heritage buildings. For example, wooden structures built low to the ground need adequate sunlight & air flow to prevent or reduce dampness and deterioration. Topography, sunlight angles, shading from adjacent new developments and disturbance to drainage and aquifers need to be taken into consideration.

Jacobsen Cottage provides a good example of this with natural spring water seepage from the slope above flowing past the house for days after rain and with the neighbouring house positioned above us means we lose the sun from 2.30pm in winter.

No 11 Concentrate on the immediate city commercial centre area to make it attractive (i.e. Bridge St Plan), & commencing intensification in the inner commercial zone and industrial area of St Vincent & Lower Vanguard Streets implementing design co-ordination.

No 12 Encourage tiny homes to be built on existing properties where feasible rather than building upwards

No 13 Consider protection of existing green belts of established trees rather than grass playing fields. Extremely important ecologically and also for healing and well-being.

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

5818

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: Full Name: <i>Anne Molloy</i> Address: Telephone: Email: <i>annemolloy@proton.me</i>
--	---

- ☐ I could not obtain an advantage in trade competition through this Submission.
- ☐ I wish to be heard in support of my Submission at the Council Hearing.

I OPPOSE the Plan Change; and particularly the following

1. the creation of a High Density Residential Zone (HDZ), that has a max height greater than 12 m, as it is not mandated under NPS-UD 2020
2. the loss of the existing protection for sunlight to all properties, because it is critical component of residential amenity in a City as it provides warmth and energy efficiency.
3. The omission of any requirement to provide carparks in any new development

I SEEK the following decision from the Council - *come up with a new Plan Change*

1. rear and Side Yard Setback of not less than 1.5 metres
2. an amendment to ensure that at least one car park is provided for each residential Unit in the areas presently proposed to be re zoned
3. That Council will prioritise Housing growth and intensification within the Inner City, before the current residential zones;

I REQUEST that Council appoints an independent Panel to hear the Submissions; and gives a further Notice extending the Closing Date for Submissions

I ACKNOWLEDGE that I have found it extremely difficult to digest the total effect of the proposed PC 29 and its supporting documentation of over 2,000 pages,

Other comments or concerns I have about Plan Change 29

PC29 will change the look, feel, beauty, uniqueness, heritage + specialness of Nelson. It is not considering the people who currently reside in Nelson. It is a plan for people who may move to Nelson, who may afford/want to live in apartments. It does not value the uniqueness of this town, or have regard for the people who currently live here.

Suggestion for how Nelson could solve it's "so called" housing crisis

Density in the city centre + creative housing in industrial areas ie Bricker/Warehouse areas, streets where 4-6 story buildings do not block light from houses or change the look + feel of the street. Build high density town houses w/ green areas outside of city + provide efficient reliable public transport.

I acknowledge that my name and address are required to be made publicly available

Anne Molloy

Submitter

26.10.23

Date

NB: TO BE DELIVERED TO NCC OR SENT TO environmental.planning@ncc.govt.nz by 4.00 pm

Tuesday 19th September

NDOCs 539570224-17956

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

Received: 27/10/23

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: Full Name: CATHERINE LARSON Address: Telephone: 5461097 Email:
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5819

☒

I could not obtain an advantage in trade competition through this Submission.

☒

I wish to be heard in support of my Submission at the Council Hearing.

I OPPOSE the Plan Change; and particularly the following

1. the creation of a High Density Residential Zone (HDZ), that has a max height greater than 12 m, as it is not mandated under NPS-UD 2020
2. the loss of the existing protection for sunlight to all properties, because it is critical component of residential amenity in a City as it provides warmth and energy efficiency.
3. The omission of any requirement to provide carparks in any new development

I SEEK the following decision from the Council

1. rear and Side Yard Setback of not less than 1.5 metres
2. an amendment to ensure that at least one car park is provided for each residential Unit in the areas presently proposed to be re zoned
3. That Council will prioritise Housing growth and intensification within the Inner City, before the current residential zones;

I REQUEST that Council appoints an independent Panel to hear the Submissions; and gives a further Notice extending the Closing Date for Submissions

I ACKNOWLEDGE that I have found it extremely difficult to digest the total effect of the proposed PC 29 and its supporting documentation of over 2,000 pages,

Other comments or concerns I have about Plan Change 29

Suggestion for how Nelson could solve it's "so called" housing crisis

- 1) Residential apartments to be encouraged to be built/designed/unwashed, above the shops/commercial areas in town streets within the square of Tasman, Nile, Halifax Streets & Rutherford Street with small parks & lots of trees.
- 2) Nelson Port/Marina extended south with floating 1+2 story appartment protected by the boulder bank, these dwellings accessed along walkways perpendicular to Q.E. drive. There are already parks & walkways nearby for residents. The dwellings are not in any other residents way.

I acknowledge that my name and address are required to be made publicly available close to the

...
 Submitter

18/10/23
 Date

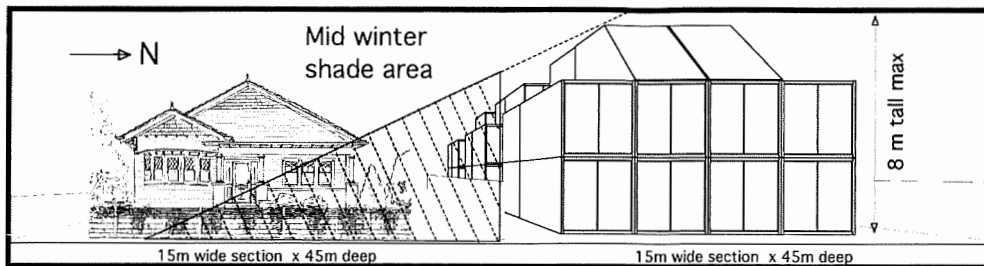
NB: TO BE DELIVERED TO NCC OR SENT TO environmental.planning@ncc.govt.nz by 4.00 pm

NDCS-539570224-17960

NELSON'S "your sunlight" DAYLIGHT ROBBERY!

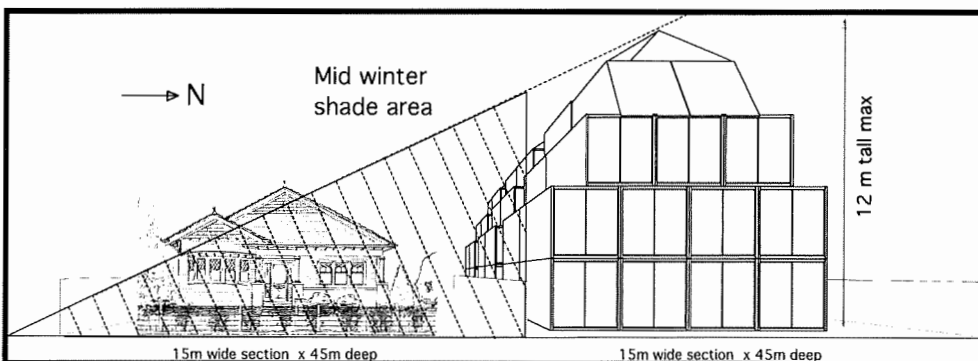
Nelson City Council is planning drastic changes to Nelson's urban environment, giving developers "As Of Right" to build 3 types of mass infill - no input by you!

General Residential Zone - GRZ



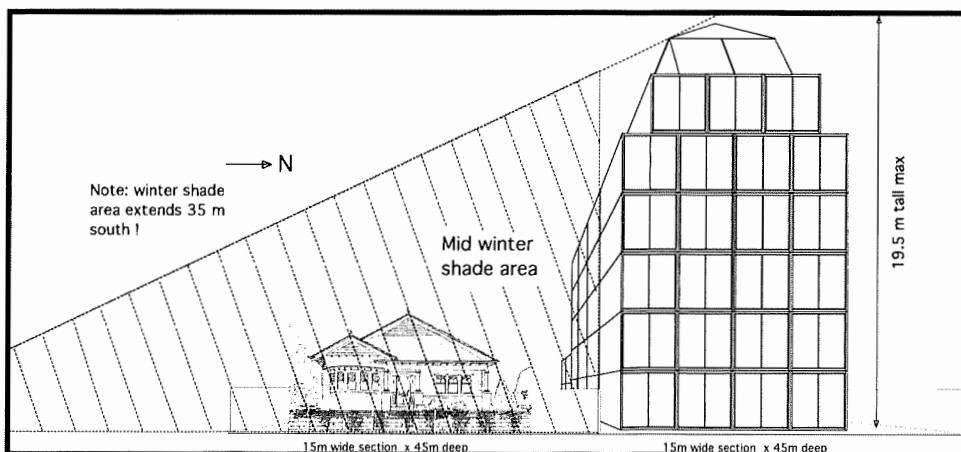
Three x's 2 story houses - 2+ units per building up to 550 sq m of habitable space. Can be just 1 m from lot line - 8 m tall. ~ 45 - 20' containers stacked up on your boundary without ANY say from you!! **NO PARKING REQUIRED**

Medium Density Zone - MDZ



Three x's 3 story houses - 3+ units per building up to 1000 sq m of habitable space. Can be just 1 m from lot line - 12 m tall. ~ 65 - 20' containers stacked up on your boundary without ANY say from you!! **NO PARKING REQUIRED**

High Density Zone - HDZ



Apartment complex - up to 45 units in the building up to 2000 sq m of habitable space - can be just 1 m from lot line - 19.5 m tall approx. ~ 120 - 20' containers stacked up on your boundary !!

**NELSON
NEEDS
YOU TO
HAVE
YOUR SAY !**

Check YOUR
Re-Zoning at
Shape Nelson
-ePlan

"MAKE YOUR
VOICE HEARD"

Submissions

close on Oct. 31st

FaceBook
Stop Plan
29

Email
stopplan29@gmail.com

- NO PARKING REQUIRED

RMA Submission Form for Publicly Notified Plan Change 29



Return your submission by 4pm on
Tuesday 31 October 2023 to:

Senior Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
Nelson 7040

(Hand delivery or courier to: Ground Floor, Civic House, 110 Trafalgar Street,
Nelson 7010 or email to: environmental.planning@ncc.govt.nz with plan
change no.29 in the subject line)

*Required

Submitter Details

Full Name*	Leslie Raymond Trimnell & Belinda Wilson		
Organisation			
Contact Person	Leslie (Les) Trimnell		
Postal address*			
Telephone*	Email*	les.trimnell@gmail.com	

OFFICE USE
Submission No: 5820
Date Received Stamp: 31/10/23
NDOCs No: 589570224-17963

Trade Competition*

If you are a person who could gain an advantage in trade competition through the submission your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act 1991.

- ☐ I/we could not gain an advantage in trade competition through this submission.
- ☐ I/we could gain an advantage in trade competition through this submission. if yes, please complete the following:
- ☐ I/we are directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.
- ☐ I/we are not directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Council Hearing*

- ☒ I/we do not wish to be heard in support of my/our submission.
- ☐ I/we wish to be heard in support of my/our submission. If yes:
- ☐ I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings.

Public information

Please note that your name and address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as council.

L R Trimnell & B E R Wilson
Signature of Submitter*
(or person authorised to sign on behalf of submitter - a signature is
not required if you make your submission by electronic means)

31 October 2023
Date*

RMA Submission Form for Publicly Notified Plan Change 29

The specific provisions of the Proposed Plan Change that my submission relates to are as follows:

- | | |
|--|--|
| ☐ Entire Plan Change | ☐ Papakāinga |
| ☒ Residential | ☐ Transport |
| ☒ Inner City and City Fringe | ☐ Mapping |
| ☐ Industrial | ☐ Infrastructure |
| ☐ Suburban Commercial | ☐ Area outside of Plan Change |
| ☐ Natural Hazards/Climate Change | ☐ Subdivision |
| ☐ Heritage | ☐ Other |

- I/we*: ☐ Oppose the Plan Change in part
☐ Support the Plan change in part
☐ Are Neutral about the Plan Change
- ☒ Oppose the Plan Change
☐ Support the Plan Change
☐ Request amendments to the Plan Change

My submission is*:

(Include whether you support or oppose the specific provisions or wish to have them amended, and reasons for your views)

The plan changes for high density residential zones bordering on existing heritage precincts like South street will have major impacts the historic integrity of the area.

RMA Submission Form for Publicly Notified Plan Change 29

I seek the following decision from the Council*:

(Give precise details, where amendments are sought, provide details below of what changes you would like to see).

More detail on impact to historical precincts

Note:

- 1) This form is only for the purpose of making a submission on Proposed Plan Change 29 to the Nelson Resource Management Plan. It is NOT for making a further submission (i.e., in support or opposition to an original submission) or for making a submission on a resource consent or on Council's Annual Plan.
- 2) It is not mandatory to use either the cover or content sheet of this form, however your submission must be in writing and provide the necessary information as indicated on the form, e.g., what is supported or opposed, the reason why and the decision sought, full contact details, etc.
- 3) Council cannot accept a submission that does not clearly indicate what a submitter wishes Council to do (i.e., Council to make a decision to refuse, amend or accept the Plan Change). Please indicate specific recommendations if amendments are sought. Council also cannot accept a submission that does not relate specifically to the Plan Change. In these cases, the submission may be considered 'Out of Scope' and may not be considered further.
- 4) Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - a. is frivolous or vexatious.
 - b. discloses no reasonable or relevant case.
 - c. would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
 - d. contains offensive language.
 - e. is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

Received: 30/10/23

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: Full Name: MICHAEL LESLIE COOPER Address: T Email: mikecooper@uictrix.co.nz
--	--

S821

NDCS 53970224-17964

- ☒ I could not obtain an advantage in trade competition through this Submission.
☐ I wish to be heard in support of my Submission at the Council Hearing.

I OPPOSE the Plan Change; and particularly the following

1. the creation of a High Density Residential Zone (HDZ), that has a max height greater than 12 m, as it is not mandated under NPS-UD 2020
2. the loss of the existing protection for sunlight to all properties, because it is critical component of residential amenity in a City as it provides warmth and energy efficiency.
3. The omission of any requirement to provide carparks in any new development

I SEEK the following decision from the Council

1. rear and Side Yard Setback of not less than 1.5 metres
2. an amendment to ensure that at least one car park is provided for each residential Unit in the areas presently proposed to be re zoned
3. That Council will prioritise Housing growth and intensification within the Inner City, before the current residential zones;

I REQUEST that Council appoints an independent Panel to hear the Submissions; and gives a further Notice extending the Closing Date for Submissions

I ACKNOWLEDGE that I have found it extremely difficult to digest the total effect of the proposed PC 29 and its supporting documentation of over 2,000 pages,

Other comments or concerns I have about Plan Change 29

This proposal is an invitation to unscrupulous developers to create ghetto like suburbs.

Suggestion for how Nelson could solve it's "so called" housing crisis

limit the time a house can stand empty.
 control the costs of rentals.
 the issue of the accommodation being subverted in Air BnB.

I acknowledge that my name and address are required to be made publicly available

M. L. Cooper

Submitter

28/10/2023

Date

NB: TO BE DELIVERED TO NCC OR SENT TO environmental.planning@ncc.govt.nz by 4.00 pm

Tuesday 19th September

Ree: 31/10/23
Submission: 5822
NDOCS: 539570224-17965

Senior Planning Administrator
RMA Plan Submission
Nelson City Council
PO Box 645
Nelson 7040
Environmental.planning@ncc.govt.nz

Full Name: Christopher Geen

Address: :

Telephon

Email: angela.christopher@xttra.co.nz

Signature of Submitter:

Date: 31 October 2023



I /COULD NOT obtain an advantage in trade competition through this submission.

I WISH/to be heard in support of my submission.

Firstly, I reject PC 29 in its entirety, but if it is not rejected then these are my points...

1) The Plan Change 29 Process. I want to acknowledge...

- a) That I have found it difficult to digest the total effect of the proposed PC 29 and its supporting documentation due to its size and complexity.
- b) That access to a paper copy of PC 29 and the Section 32 reports has not been made available for residents who do not have access to, or the ability to use a computer.
- c) That I have found PC 29 lack of early public engagement and consultation by Council, with its severe implications towards the well-being of existing rate paying residents enjoyment of their properties, extremely stressful and unnecessary.
- d) That I have been put in a position of hoping more qualified citizens than I, will make more comprehensive submissions covering my concerns as to the future of Nelson and its ratepaying residents.
- e) That Council Planning Staff have stated at numerous meetings "This is a 'Broad Brush approach' that requires public submissions to refine the plan". Such a statement implies PC 29 has been prematurely put out for public submissions in an incomplete and inaccurate state that requires the public to learn and understand its entirety, so they can re-design it.
 - i) I am asking Council to withdraw PC 29 and get Council Planning staff to refine the plan design and then put it back out for public submissions.

- 2) Due to several family losses here in Nelson and in Australia I haven't been able to submit a full objection. I wish to be heard on several topics regards intensification , impact on rates , environment , developer lead not design and consultation ,usage of sections being developed etc

Received 30/10/23

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: Full Name: CHRIS HORNER Address: Telephone: Email: cyhorner1@gmail.com
--	---

5823

17967-22453955 NDCS

- ☒ I could not obtain an advantage in trade competition through this Submission.
☒ I wish to be heard in support of my Submission at the Council Hearing.

I OPPOSE the Plan Change; and particularly the following

1. the creation of a High Density Residential Zone (HDZ), that has a max height greater than 12 m, as it is not mandated under NPS-UD 2020
2. the loss of the existing protection for sunlight to all properties, because it is critical component of residential amenity in a City as it provides warmth and energy efficiency.
3. The omission of any requirement to provide carparks in any new development

I SEEK the following decision from the Council

1. rear and Side Yard Setback of not less than 1.5 metres
2. an amendment to ensure that at least one car park is provided for each residential Unit in the areas presently proposed to be re zoned
3. That Council will prioritise Housing growth and intensification within the Inner City, before the current residential zones;

I REQUEST that Council appoints an independent Panel to hear the Submissions; and gives a further Notice extending the Closing Date for Submissions

I ACKNOWLEDGE that I have found it extremely difficult to digest the total effect of the proposed PC 29 and its supporting documentation of over 2,000 pages,

Other comments or concerns I have about Plan Change 29

ALL THE REASONS THAT I OPPOSE PLAN 29
HAVE BEEN OUTLINED FROM ALL THE
MEETINGS THAT HAVE BEEN HELD.

Suggestion for how Nelson could solve it's "so called" housing crisis

~~Build up the CBD,~~
Build up the CBD,

I acknowledge that my name and address are required to be made publicly available

Ch.....

Submitter

26-10-23

Date

NB: TO BE DELIVERED TO NCC OR SENT TO environmental.planning@ncc.govt.nz by 4.00 pm

Tuesday 19th September

Rec: 31/10/23
Submission: S824
NDACS: 539570224-17969

Senior Planning Administrator
RMA Plan Submission
Nelson City Council
PO Box 645
Nelson 7040
Environmental.planning@ncc.govt.nz

Full Name: Angela Geen

Address:

Telephon

Email: angela.christopher@xtra.co.nz

Signature of Submitter:

Date: 31 October 2023

I /COULD NOT obtain an advantage in trade competition through this submission.

I WISH/to be heard in support of my submission.

Firstly, I reject PC 29 in its entirety, but if it is not rejected then these are my points...

1) The Plan Change 29 Process. I want to acknowledge...

- a) That I have found it difficult to digest the total effect of the proposed PC 29 and its supporting documentation due to its size and complexity.
- b) That access to a paper copy of PC 29 and the Section 32 reports has not been made available for residents who do not have access to, or the ability to use a computer.
- c) That I have found PC 29 lack of early public engagement and consultation by Council, with its severe implications towards the well-being of existing rate paying residents enjoyment of their properties, extremely stressful and unnecessary.
- d) That I have been put in a position of hoping more qualified citizens than I, will make more comprehensive submissions covering my concerns as to the future of Nelson and its ratepaying residents.
- e) That Council Planning Staff have stated at numerous meetings "This is a 'Broad Brush approach' that requires public submissions to refine the plan". Such a statement implies PC 29 has been prematurely put out for public submissions in an incomplete and inaccurate state that requires the public to learn and understand its entirety, so they can re-design it.
 - i) I am asking Council to withdraw PC 29 and get Council Planning staff to refine the plan design and then put it back out for public submissions.

- 2) Due to several family losses here in Nelson and in Australia I haven't been able to submit a full objection. I wish to be heard on several topics regards intensification , impact on rates , environment , developer lead not design and consultation ,usage of sections being developed etc

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

Received: 30/10/23

a

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: Full Name: John Richard Harrison Address: Telephone: Email: harrison91@kinect.co.nz
--	--

5825

ND005-539570224-17975

- ☐ I could not obtain an advantage in trade competition through this Submission.
- ☐ I wish to be heard in support of my Submission at the Council Hearing.

I OPPOSE the Plan Change; and particularly the following

1. the creation of a High Density Residential Zone (HDZ), that has a max height greater than 12 m, as it is not mandated under NPS-UD 2020
2. the loss of the existing protection for sunlight to all properties, because it is critical component of residential amenity in a City as it provides warmth and energy efficiency.
3. The omission of any requirement to provide carparks in any new development

I SEEK the following decision from the Council

1. rear and Side Yard Setback of not less than 1.5 metres
2. an amendment to ensure that at least one car park is provided for each residential Unit in the areas presently proposed to be re zoned
3. That Council will prioritise Housing growth and intensification within the Inner City, before the current residential zones;

I REQUEST that Council appoints an independent Panel to hear the Submissions; and gives a further Notice extending the Closing Date for Submissions

I ACKNOWLEDGE that I have found it extremely difficult to digest the total effect of the proposed PC 29 and its supporting documentation of over 2,000 pages,

Other comments or concerns I have about Plan Change 29

Lack of privacy.
 I would be over whelmed by height of apartments
 Corridor between house and apartments would make the
 house & ground cold and mouldy with lack of sun light
 Greater noise Level

Suggestion for how Nelson could solve it's "so called" housing crisis

I acknowledge that my name and address are required to be made publicly available

J.R. Harrison
 Submitter

18-10-2023
 Date

NB: TO BE DELIVERED TO NCC OR SENT TO environmental.planning@ncc.govt.nz by 4.00 pm

Tuesday 19th September

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: Full Name: EDWIN ROBERT MORRIS Address: Telephone: Email: VERNETTIE1303@GMAIL.COM
--	--

S826

NDOC5-539570224-17977

- ☐ I could not obtain an advantage in trade competition through this Submission.
☐ I wish to be heard in support of my Submission at the Council Hearing.

I OPPOSE the Plan Change; and particularly the following

1. the creation of a High Density Residential Zone (HDZ), that has a max height greater than 12 m, as it is not mandated under NPS-UD 2020
2. the loss of the existing protection for sunlight to all properties, because it is critical component of residential amenity in a City as it provides warmth and energy efficiency.
3. The omission of any requirement to provide carparks in any new development

I SEEK the following decision from the Council

1. rear and Side Yard Setback of not less than 1.5 metres
2. an amendment to ensure that at least one car park is provided for each residential Unit in the areas presently proposed to be re zoned
3. That Council will prioritise Housing growth and intensification within the Inner City, before the current residential zones;

I REQUEST that Council appoints an independent Panel to hear the Submissions; and gives a further Notice extending the Closing Date for Submissions

I ACKNOWLEDGE that I have found it extremely difficult to digest the total effect of the proposed PC 29 and its supporting documentation of over 2,000 pages,

Other comments or concerns I have about Plan Change 29

I DISAGREE WHOLE HEARTEDLY TO PC 29 & THE WAY ITS BEEN PRESENTED. THERE HAS BEEN NO COMMUNITY INVOLVEMENT & NO DESIGN PUT FORWARD AS TO HOW THIS WILL ALL LOOK FOR NELSON.

Suggestion for how Nelson could solve it's "so called" housing crisis

I acknowledge that my name and address are required to be made publicly available

.....


Submitter

27-10-23

Date

NB: TO BE DELIVERED TO NCC OR SENT TO environmental.planning@ncc.govt.nz by 4.00 pm

Tuesday 19th September

RMA Submission Form for Publicly Notified Plan Change 29

Return your submission by 4pm on
Tuesday 31 October 2023 to:

Senior Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
Nelson 7040

(Hand delivery or courier to: Ground Floor, Civic House, 110 Trafalgar Street,
Nelson 7010 or email to: environmental.planning@ncc.govt.nz with plan
change no.29 in the subject line)

OFFICE USE
Submission No: <u>5827</u>
Date Received Stamp: <u>31/10/23</u>
NDOCs No: <u>539570224-17979</u>

*Required

Submitter Details

Full Name*	<u>KEELEY GERRARD</u>		
Organisation			
Contact Person			
Postal address*			
Telephone*	Email*	<u>keeleygerrard@gmail.com</u>	

Trade Competition*

If you are a person who could gain an advantage in trade competition through the submission your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act 1991.

- ☒ I/we **could not** gain an advantage in trade competition through this submission.
- ☐ I/we **could** gain an advantage in trade competition through this submission. *if yes, please complete the following:*
- ☐ I/we **are** directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.
- ☐ I/we **are not** directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Council Hearing*

- ☒ I/we **do not** wish to be heard in support of my/our submission.
- ☒ I/we wish to be heard in support of my/our submission. If yes:
- ☒ I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings.

Public information

Please note that your name and address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as council.


Signature of Submitter*

(or person authorised to sign on behalf of submitter - a signature is not required if you make your submission by electronic means)

30/10/23
Date*

RMA Submission Form for Publicly Notified Plan Change 29

The specific provisions of the Proposed Plan Change that my submission relates to are as follows:

- | | |
|---|--|
| ☒ Entire Plan Change | ☐ Papakāinga |
| ☐ Residential | ☐ Transport |
| ☐ Inner City and City Fringe | ☐ Mapping |
| ☐ Industrial | ☐ Infrastructure |
| ☐ Suburban Commercial | ☐ Area outside of Plan Change |
| ☐ Natural Hazards/Climate Change | ☐ Subdivision |
| ☐ Heritage | ☐ Other |

- | | | |
|--------|--|--|
| I/we*: | ☐ Oppose the Plan Change in part | ☐ Oppose the Plan Change |
| | ☐ Support the Plan change in part | ☐ Support the Plan Change |
| | ☐ Are Neutral about the Plan Change | ☐ Request amendments to the Plan Change |

My submission is*:

(Include whether you support or oppose the specific provisions or wish to have them amended, and reasons for your views)

- I do not agree with PC 29.
 - I do agree an intensification plan is needed for the future of our growing city but the overall design needs to be carefully orchestrated by a dedicated group of suitably qualified people that have vision and experience to create a dynamic, liveable community whilst respecting neighbourhoods and the historical significance of our City.
 - The CBD has a lot of empty buildings and would be suitable to create multi story dwellings and if designed well could energise the inner city benefiting residence, business and the community.
 - King St residence have spent the past two years living with the anxiety and uncertainty of a large housing development changing our community and losing daylight hours, increased traffic etc.
- Nelson City Councils Plan 29 has created the same stress to residence on a much larger scale.

RMA Submission Form for Publicly Notified Plan Change 29

I seek the following decision from the Council*:

(Give precise details, where amendments are sought, provide details below of what changes you would like to see).

Chapter 7 Residential Zone

Height - 19.5 m (6 storeys)

There is no way possible to make a six story building look attractive or avoid negative impact on the neighbours and neighborhood.

This should be removed from PC 29.

Note:

- 1) This form is only for the purpose of making a submission on Proposed Plan Change 29 to the Nelson Resource Management Plan. It is NOT for making a further submission (i.e., in support or opposition to an original submission) or for making a submission on a resource consent or on Council's Annual Plan.
- 2) It is not mandatory to use either the cover or content sheet of this form, however your submission must be in writing and provide the necessary information as indicated on the form, e.g., what is supported or opposed, the reason why and the decision sought, full contact details, etc.
- 3) Council cannot accept a submission that does not clearly indicate what a submitter wishes Council to do (i.e., Council to make a decision to refuse, amend or accept the Plan Change). Please indicate specific recommendations if amendments are sought. Council also cannot accept a submission that does not relate specifically to the Plan Change. In these cases, the submission may be considered 'Out of Scope' and may not be considered further.
- 4) Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - a. is frivolous or vexatious.
 - b. discloses no reasonable or relevant case.
 - c. would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
 - d. contains offensive language.
 - e. is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

RECEIVED

31 OCT 2023

Customer Service



RMA Submission Form for Publicly Notified Plan Change 29

Return your submission by 4pm on 31st Oct 2023
~~Tuesday 19 September 2023~~ to:

Senior Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
Nelson 7040

(Hand delivery or courier to: Ground Floor, Civic House, 110 Trafalgar Street, Nelson 7010 or email to: environmental.planning@ncc.govt.nz with plan change no.29 in the subject line)

OFFICE USE
Submission No: <u>5828</u>
Date Received Stamp: RECEIVED 31 OCT 2023
NDOCs No: <u>539570224-17982</u>

*Required

Submitter Details

Full Name*	<u>MICHELE RUTH HITE</u>		
Organisation			
Contact Person			
Postal address*			
Telephone*	Email*	<u>michele.r.jones26@gmail.com</u>	

Trade Competition*

If you are a person who could gain an advantage in trade competition through the submission your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act 1991.

- ☒ I/we could not gain an advantage in trade competition through this submission.
- ☐ I/we could gain an advantage in trade competition through this submission. If yes, please complete the following:
- ☐ I/we are directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.
- ☐ I/we are not directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Council Hearing*

- ☐ I/we do not wish to be heard in support of my/our submission.
- ☐ I/we wish to be heard in support of my/our submission. If yes:
- ☒ I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings.

Public information

Please note that your name and address is required to be made publicly available under the Resource Management Act 1991, as any further submission supporting or opposing this submission is required to be forwarded to you as well as council.

Michele R Hite
Signature of Submitter*

(or person authorised to sign on behalf of submitter - a signature is not required if you make your submission by electronic means)

31/10/2023
Date*

To whom it may concern.

I oppose Plan Change 29 in its present form and suggest that it be withdrawn. If, however, it is not rejected, I would like to submit the following:

I do NOT support the proposed Medium Density and High Density provisions.

The areas of the 'dress-circle' should be treated the same. There are many of the same types of character houses and bungalows on either side of the border of the proposed high and medium density zones.

If there must be a change, I request that Council applies the new General Residential zone category to the proposed Medium Density and High Density zones.

I do support town planning that is considerate of existing dwellings within residential areas, that would respect and cherish the sunlight access, heritage and residential character of Nelson.

Tall modern buildings, situated adjacent to historic and character houses and bungalows is not a long-term vision for Nelson and its residents and visitors.

Secondary minor dwellings would cater for an increasing population and an ageing one. This sort of infill housing on existing residential properties would increase housing capacity without detracting from current street character.

Where houses are removed, the use of two-story terrace houses would be a good way to intensify without losing street character or garden/parking space.

I oppose the proposed changes to building activity that do not require written approval from neighbours.

I support resource consent site notices being situated at properties so that neighbours are able to be involved in the decision making process.

Having spent many mornings 'meeting and greeting' visitors to the Cathedral, I appreciate that both locals and visitors value Nelson's residential areas to visit as much as things like the parks and art gallery.

Three storey buildings (or greater) built close to current residences, which were built under the current daylight rules will adversely affect sun access, let alone any solar panels and passive solar heating that those properties currently enjoy. It is not a very green idea to make solar heating/electricity less appealing.

Blocking the sun will lower property values. We all know that if a block of apartments is built, that those on the south (least sunny) side command lower sale prices than those on the north side. If this happens to new apartment builds, the obvious inference is that established houses, which then get their sun blocked by newly built neighbouring buildings, will also have their values negatively impacted.



I suggest that we retain current sunlight as well as daylight angles in residential properties. I also suggest no change to set-backs from boundaries.

The council's own newsletter points out that all new buildings in the commercial zones will require a resource consent, why are the new residential buildings in the proposed Medium and High Density zones less deserving of scrutiny?

I propose that High Density zones should be kept primarily within the inner city CBD area where there are already taller buildings, built closely together and new ones would have less material impact on the quality of life of the inner city dwellers, who, (having lived on top of a couple of multi-story CBD commercial buildings in Christchurch in the 90's, myself) are prepared to trade-off the normal suburban pleasures for the convenience of the city at your doorstep.

My main area of concern is that residents will not get a say in the developments in their neighbourhoods without resource consent rules changing so dramatically. Surely in a democracy, it should not only be those with deep pockets who get a say on how their community should look and be enjoyed.

For those concerned about intensification in the inner city, the street level charm can be maintained by keeping the facades of the older buildings in the city centre, while building taller structure behind them, which include residential apartments above the shops. This will add a layer of security for both residents as well as shopkeepers when buildings are constantly occupied.

Wakatu carpark would be a better place for a six-storey building than in the residential areas:

- 2x floors parking - excellent appeal to public in the heat of summer or a cold winter.

- 1x floor shops

- 2x floors residential apartments

- 1x set-back restaurant on top level including greenspace plantings on surrounding balcony

While I am grateful for the extended time frame for these submissions, a plan such as this is not proposed very often, and such sweeping change to the current rules requires much longer for public understanding and feedback. It is an extensive document and I am no town planner, but I do have concerns after familiarising myself with Plan Change 29, as much as I was able to do.

Please allow further public submissions on any revised version of Change Plan 29.

Yours Faithfully,

Michele Hite.



Rec: 31/10/23
Submission: 829
NDAS: 539570224
-17985

To:
Senior Planning Administrator
RMA Plan Submissions
Nelson City Council
PO Box 645
Nelson 7040

Plan Change 29 Submission

I oppose the Plan Change if it is adopted without modifications to allow for the following concerns.

I am not directly affected or have any commercial interest in the effects of the Plan change.
I can see the importance of housing intensification in Nelson, and congratulate the Council on tackling this issue.

My main concern is for the proposed Examiner Street area 6 storey Kaianga Ora building as it is likely to be one of the first to be built and since it is intended for social housing will presumably be a 'lower budget' style of construction. If it is 'done badly' it will significantly affect a charming and historic part of Nelson that is one of the main gateways to the city. If done well it will help people accept, and see the benefit in, future similar developments.

In my opinion, leaving it entirely up to developers to decide on the exterior look and impact of a 6 storey building in an otherwise low-rise area is a mistake.

Adopting the Plan change in its entirety is voluntary for Nelson, I understand, so I feel our Council can tweak it to be most beneficial for the future of our city. Nelson has this chance to get it right. If the RMA is too cumbersome to allow new development within a practical time-frame then at least have some guidelines/restrictions to prevent developers going for the cheapest options.

My view of 'done well'

1. Visual impact: an exterior facade somewhat in keeping with the surrounding area, e.g. not sheer-walled in a low-rise area. Visual impact is extremely important for a large building as it will have a huge presence on the landscape for 80+ years.
2. Exterior effect on surrounding houses: The change to existing building code requirements around daylight angles will significantly affect quality of life for people in immediate surrounding houses and the resale value of their properties. I realise that compensation is not possible or practical but maybe the Council could offer a reduction in rates until the current owner sells. Normally their rates would rise as their land value increases due to intensification, however I feel it is fair that the wider community via the council share some of the impact rather than a few unfortunate individuals.
3. Interior Layout : Not uniformly single rooms so that there is a mixture of people and lifestyles in each new building. Canadian architect and neuroscientist, Tye Farrow, has spoken on a NZ tour recently about his research, commenting that where one lives has more impact on health and well-being than medical interventions. I hope Kaianga Ora is well informed about his views and insights.
4. Parking: Providing parking seems to be optional. In the Examiner Street area, the surrounding streets already have a significant shortage of street parking. I agree that the 15-minute city concept is important to foster so residents can rely on walking, biking and buses. People need to be mobile

in modern society for their employment, getting to appointments, shopping and for their own recreation/mental health. Unfortunately Nelson is not large enough to specifically support commuting to work in many cases. I feel that secure and safe space to store electric bikes (in each unit or communal area) would encourage an affordable solution to most transport issues, healthy exercise and independence. Also ideally there should be provision for electric car parking and charging area, and maybe 1-2 electric cars available in a large building for residents to hire.

The current residents who live in this fringe area of town have already embraced the 15-minute concept and should not be 'punished' by poorly designed buildings. If buildings in commercial zones require building consent to ensure 'quality design' then I feel that sensitive design is even more important in residential areas. Residents close to a large building have to look at and live with it 24 hours a day so it affects their quality of life and the value of their home/largest investment.

A handwritten signature in blue ink, appearing to read 'G. Huynh', with a long horizontal flourish extending to the right.

Gabrielle Huynh

Date: 31 October 2023

ghuygens.nz@gmail.com