

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S501
Submitter Name	Jade McFarlane
Submitter first name	Jade
Submitter middle name	Isaiah
Submitter surname	McFarlane
Submitter is contact	Yes
Email	jade.mcfarlane@eliotsinclair.co.nz
Wish to be heard	No
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
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Residential Zones	Medium Density Residential Zone	Support in part	I consider that intensification is an appropriate measure for Nelson cities growth. A carte blanche approach, that is currently being forced on Tier 1 cities across NZ, in an unplanned manner, will likely lead to perverse outcomes and therefore I make this submission in support of an industry peers submission- being that of NelsonTasman2050, that intensification needs to be accompanied by comprehensive spatial plans prior to being implemented.
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None

My name is Jade McFarlane, I have been working in the Canterbury and to a lesser degree the Tasman region as an Urban Designer for the past 14 years, masterplanning new communities over 1000 allotments that include low and medium density as well as neighbourhood centres.

Initially, while working for Urban Design firm Isthmus, but more recently, upon completion of a Masters in Urban Design and subsequent medium density and mixed used masterplanning excersizes and peer reviews, I gained knowledge that quality urban environments must respond to context and the stakeholders of that communtiy to be successful- for example with the provision of complete streets that cater for the needs of all user groups, as well as provision for appropriate levels of amenity and open space within walkable catchments to neighbourhood cores.

The NPS-US mentions the term well-functioning urban environment as an outcome that is not only desired but a clear directive for the future of New Zealand cities and urbanised areas in general.

My submission, having read the relevant documentation proposed, is primarily in support of my peer, Timo Neubauer's submission, put forward under NelsonTasman2050. All of his points in relation to intensification are valid and aligned with best practice overseas and examples in new zealand with regards to process and successful outcomes. I submit now in support of his submission.

Additional points I make to NelsonTasman2050 is the need to hold workshops with various

neighbourhoods key stakeholders and urban design experts across the city and determine whether those specific communities are after preservation, restoration or regeneration- as all three have different approaches to intensification. This model of identifying precinct type and having community led outcomes is critical to success- as there is no one fits all approach however having the 3 categories above and building an approach for each would be a smart way to progress (refer Cincinatti code for a successfully implemented charette based approach using the above analysis phase).

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: S502
Date Received Stamp: 30/10/2023
NDOCs No: NDOCS-539570224 -16887

*Required

Submitter Details

Full Name*	Carina Thomas-Beech		
Organisation			
Contact Person	Carina		
Postal address*	5 Wilson Place, Stoke Nelson		
Telephone*		Email*	

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.

Carina Thomas-Beech

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)

30/10/2023

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 believe that this PLAN CHANGE has not been given enough thought, residences were not consulted before the PLAN CHANGE was announced.

I would not want my home surrounded by high rise buildings as I would no longer have any view or sun.

I purchased my home, with my late husband, in 1987, we bought our forever home.

A home with a history, built in 1931/32, from 2 Rimu trees; a wedding gift to the Wilsons.

My home will be 100 years old in a few short years, and to imagine it being built in, or pulled down, is heartbreaking for me and my family.

I believe that there are alternative solutions to the urban sprawl of Nelson.

I am not sure what these solutions are, but many have been put forward by others interested in this submission..

I employ this council to go back to consultation with residents, qualified planners, design consultants, and town planning experts.

Regards
Carina Thomas-Beech

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).

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.

MUST be sent or delivered by 31/10/23 4pm to:

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

Stuart and Sally Hanchet

Received: 30/10/2023

Sub No: S505

NDOCS-539570224-16897

Date: 30/10/2023

I reject PC 29.

Submission Point 1: High Density Residential zones (HDZ)

Our key submission points are as follows:

1. We oppose the proposed HDZ in residential areas where there is no walkable access to amenities (supermarkets, schools and public transport) as well where there is a risk of increasing natural hazards (e.g. floods and land instability).
2. We support the proposed increase in residential density in the inner city with mixed residential and commercial zones as these areas provide residents with direct walkable access to shopping and public transport services.
3. If HDZ are approved for some areas, then we particularly oppose the proposed HDZ in the Tahunanui Hills area. We 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 development and frequent weather events.
4. We ask the Council to make sure all proposed HDZ have walkable access to a supermarket (not a local diary). For example, Christchurch planners are only proposing HDZ within 800m of a supermarket.
5. We ask Council to ensure a minimum of two storey dwellings be built on all new green field developments. E.g. Golden Elms in Toi Toi, Ngawhatu Valley and Marsden Valley. Infrastructure is easier and cheaper to develop on flat land and would provide more housing without affecting neighbouring properties.
6. We support the establishment of multi storey and/or underground car parks to free up more land within the inner city for development..
7. We 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.

Reasons for our opposition to the proposed Tahunanui High Density Zone

1. Slope instability

We were informed by the NCC planner that there was no consideration of geotechnical issues when deciding on the proposed zoning of the area. Our biggest concern is that high density development will increase the potential severity of future slips on the Tahunanui Hills. The proposed HDZ in the

Tahunanui Hills is an area potentially affected by significant natural hazard of slope instability. Plan change 29 Housing and Hazards on the Nelson City Council website stated that intensification should not include areas potentially affected by significant natural hazards:

"Enabling the intensification of development on land currently zoned for residential and commercial uses (Residential Zone, Inner City Zone, and Suburban Commercial Zone), that is not within areas potentially affected by significant natural hazards"

Furthermore, Beca produced a slope stability report in 2021 that stated regarding the Tahunanui Hills that (emphasis added):

"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"

Many properties in the proposed HDZ have already experienced slips, Many owners have geotechnical reports that show areas unsuitable for building and where remedial action may be needed.

There has been no geotechnical input into what intensification (of up to six-storeys) will do to the stability of the Tahunanui Hills. Climate change will increase adverse weather events with even greater potential to create slips on the hill.

2. Amenities

The NCC planning team stated that the Tāhunanui Hills were chosen for the proposed high-density development because of their closeness to amenities. The amenities referred to (being the school and shops) are down a steep set of stairs and across State Highway 1, not easily accessible for young families, the elderly, or the mobility impaired without a vehicle. There are no supermarkets within walking distance of the proposed HDZ in Tāhunanui which would be a serious issue for all the HDZ residents with no vehicles.

3. Trees and Gardens in the Tāhunanui Hills HDZ

There are many established large trees (over 6 metres high) in this Tāhunanui Hill HDZ that are helping stabilise the ground and providing a habitat for our native birds. These will be lost when there is no sun to support their growth or removed to make way for intensive development.

4. Intensification

It will be expensive for developers to fulfil the requirements to build 6 storey buildings on the hill. The resulting apartments therefore would be fewer in number and expensive to buy. The Tāhunanui HDZ could easily become developments of expensive holiday apartments that sit empty for long periods of time. This does not solve our intensification, growth and affordability dilemma, and yet it locks up our valuable housing resource.

Given the above, we request the following:

1. We are asking Council to withdraw PC29 and have planning staff refine the plan design and follow the proper procedure of consultation and public engagement.

2. We ask the Council to appoint independent hearing commissioners for the plan change.
3. We ask the Council to use Statistics NZ medium projection forecasts and amend its intensification requirements accordingly.
4. We ask the Council to inform all rate payers individually with emails and letters about any changes to their property zoning and to give each ratepayer the opportunity to respond.

Thank you for the opportunity to submit on PC29.

We do not wish to speak in support of our submission at a public hearing.

We would not gain an advantage in trade competition through our submission.

The image shows two handwritten signatures in blue ink. The signature on the left is 'Stuart Hanchet' and the signature on the right is 'Sally Hanchet'. Both are written in a cursive, flowing style.

Stuart and Sally Hanchet

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

Susan Gray Capenerhurst

Telephone: (

Email: sue.richardc@xtra.co.nz

Signature of Submitter:



Date: October 27 2023

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

I do **NOT** wish to be heard in support of my submission.

Firstly, I reject PC 29 in its entirety:

1. This is a far-reaching plan as stated by the mayor. Its immediate impact on us personally was an increase in stress given that it becomes possible for the development of a high rise type of building next door/in the neighbourhood with no consultation. The Future Development Strategy spells out the need for neighbourhood plans *before* an intensification policy is cemented in place. This plan 29 seems to ignore that (amongst other things) but has picked out some support from within the strategy for high rise buildings as a stand alone solution.
It is our belief that council has seemed to ignore the well being of its citizens by its current plan proposal. A common theme at the meetings I attended was the stress this has caused.
I cannot understand how Council could not realise the potential impact on the community that this plan in its current form has engendered.
I believe this plan is too narrow in scope and ignores the wider definitions of environment as defined in the current RMA – which includes people and communities
2. I currently have an overseas student staying and when she heard about the proposed plan she was very surprised and made the comment 'But that would not suit Nelson'. If a visitor here for a scant week could notice that then I am flabbergasted that Council and planners could not see the potential for developer-led high rise buildings leading to a degraded skyline quite out of character with such (current) aims as 'residential character', 'privacy and outlook', 'scale', 'streetscape, landscape and natural features'. The current 'broad brush' approach which labels whole areas as high or medium density where building development can go ahead as long as it fits within a few criteria will lead to unacceptable outcomes.
3. One of the attractions of Nelson – it's why people come here – is obviously its weather, especially its sunshine. Council's own housing preference report (a joint TDC and NCC effort) puts this very attraction as a number one housing preference. It seems frankly ludicrous that a plan is countenanced which has, as one of its consequences, the potential to affect the amount of sunlight an affected neighbouring property could receive – especially if that property currently has full exposure to sunshine. People have bought their properties under current rules including

daylight/sunshine angles. To have that arbitrarily changed (when I believe there are excellent viable alternatives) adds to the stress caused by putting forward this plan in its current form.

I have gone to the trouble of installing solar panels within the past couple of years. I am left wondering if there is protection for that investment? And obviously there are plenty of other home owners will be feeling the same. I have even heard of people putting off their planned installation because of Plan 29.

If it is not rejected then:

1. It has been 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 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. Or preferably re-think the approach and consider far more comprehensive neighbourhood plans and consultation.
2. Because I believe that sunshine and quality daylight is central to Nelson residents' well being I want the Council to maintain the AP15 Daylight Admission protection rules to all pre-existing properties, unless the owner gives written approval to the contrary.
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.
3. I support intensification and oppose the endless green fields development which has characterised expansion but strongly believe that planning is essential to prevent a hotch potch approach. Nelson is a 'Low Rise' City with a collection of heritage and non-heritage character buildings that have attracted people for generations.
I believe Council needs to lead the way in showing a long term development plan into which developers fit rather than letting developers have their head. Areas for development need to be identified on an urban block by block approach and then that information needs to be communicated to residents of Nelson. I would like to see an over-arching Urban Development Agency which identifies suitable areas for intensification and which has a long term view.
As such I oppose the current high and medium density zones . Council should remove HDRZ from the plan completely (perhaps with the central city an exception) and should 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.
Council should look at progressively phasing in intensification – e.g. the inner city, which is perhaps the most obvious place to start where 6 storey buildings may not look totally out of place. The concept of a commercial ground floor (retaining current facades and character where possible) with residential upper floors is a popular idea being mooted by many. Potentially developing the inner city first will 'mop up' anticipated demand (and there appears to be some question mark over predicted figures based on Stats NZ) – possibly for some decades to come. This has a benefit that it will give far more time for a cohesive and well thought out plan (neighbourhood plans) which identifies other suitable areas - with city fringe areas being the next obvious target area(s).

There are lots of ideas out there – encourage car yards to move, develop the army yard. I want to see Council be prepared to use the expertise of urban planners and architects to come up with

innovative and attractive solutions. I fully support submissions such as that presented by Architect William Samuels.

Intensify by design rather than developers.

4. Finally 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 Councillors from either side of the Sept 14th vote.
 - ii) If i) is not followed then I ask that all Councillors are replaced with independent Commissioners.

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

Richard Capenerhurst

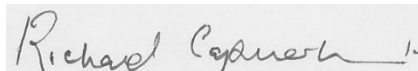
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z

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Date: October 27 2023

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3. One of the attractions of Nelson – it's why people come here – is obviously its weather, especially its sunshine. Council's own housing preference report (a joint TDC and NCC effort) puts this very attraction as a number one housing preference. It seems frankly ludicrous that a plan is countenanced which has, as one of its consequences, the potential to affect the amount of sunlight an affected neighbouring property could receive – especially if that property currently has full exposure to sunshine. People have bought their properties under current rules including daylight/sunshine angles. To have that arbitrarily changed (when I believe there are excellent viable alternatives) adds to the stress caused by putting forward this plan in its current form.

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Sub No: S505

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Reasons for our opposition to the proposed Tahunanui High Density Zone

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2. Amenities

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Stuart and Sally Hanchet

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S506
Submitter Name	Gwen Daly
Submitter first name	Gwen
Submitter surname	Daly
Submitter is contact	Yes
Email	gwendalydover@gmail.com
Wish to be heard	No
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose in part	see above	Nelson needs intensification I agree. But a modified plan that doesn't include random apartment blocks in built up residential areas, I support town houses with gardens being built. Not the whole of Nelson having the same rules. A designated area needs to be allocated for intensification which would be the inner city from Collingwood st to the NCMA roundabout to Rutherford St to Halifax st with exemptions made for light industrial and office areas, as in lower Vincent st and similar areas. A case by case decision can be made for areas deemed suitable that wouldn't affect residential areas and their daylight angles. It would be useful if the town planners could come up with a plan for the city with allocated area which included grounds for residents to use as their communal gardens. Large blocks of land with space to provide a garden for residents such as are currently provided by places such as the wood retirement home, which gives people a healthy environments to live in. I also would not like to see South Street loose its heritage status.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S507
Submitter Name	Katrina Kidson
Submitter first name	Katrina
Submitter surname	Kidson
Submitter is contact	Yes
Email	kk@katrinakidson.nz
Wish to be heard	No
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
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Residential Zones	High Density Residential Zone	Oppose in part	I support our city increasing in density with more infill, more units and more multi-storey. The present plan change goes too far however. I know that effectively 6 stories will still require consent. However it is hard to imagine these buildings being appropriate anywhere other than the CBD and mixed use areas. I'm not clear on how we manage the effects of a multi-storey building on next to an existing low rise. What is this like for the neighbouring home owners, their enjoyment of their property and their property value. The apartments that we have recently had built are a good step towards increasing density in town and I support developments, such as Kaianga Ora building 16 units on the Masonic Lodge Site on Nile St. This is very close to where I live and if it is designed and managed well, this will be a good asset for Nelson. I note that this plan proposes changing the block that I live be rezoned on from Residential to High Density. This is a big change.	Restrict the high density proposed in the new plan to the Mixed Use are and the Centre City. Allow increased density in our residential areas, but not as drastically as presently planned.
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S508

Voided

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S509
Submitter Name	Zanahe Galloway
Submitter first name	Zanahe
Submitter middle name	Ruth
Submitter surname	Galloway
Submitter is contact	Yes
Email	zanahe@herenow.co.nz
Wish to be heard	No
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
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Residential Zones	High Density Residential Zone	Oppose in part	1-infrastructure cannot support this type of intensification, especially roads limitation in specific Nelson geography. this type of intensification is not contributing to the costs preparations needed for Climate Change on the contrary will create more costs with an increase of population within the city of Nelson. 3-this type of intensification is not viable with the specific geography of Nelson with more land slides, flooding of the Maitai river and coastal ocean rise inundation map already showing the coming reality of our future.	"Plan Change 29 is the biggest plan change that we have done as a Council in a generation" (Our Nelson, Issue 176. P.6). A once in a generation plan change deserves a much longer period for public review and the formulation of submissions than the NCC has allowed for. The citizens, residents and ratepayers of Nelson have a right to expect that the Nelson City Council will adhere to the highest scientific standards (including accuracy and transparency when making proposals to change the conditions of life within which we live.Change the inflated inaccurate number of households projected to be needed! Stop intensification everywhere which creates only dormitory suburbs in Nelson .Intensify only in the CBD with high rise apartments providing parking (example: The Sands)
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Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S510
Submitter Name	Adrian Parlane
Submitter first name	Adrian
Submitter middle name	Gregory
Submitter surname	Parlane
Submitter is contact	Yes
Email	agparlane@outlook.co.nz
Wish to be heard	No
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Residential Zones	Medium Density Residential Zone	Oppose		As there was no formal house to house consultation with the RESIDENTS of this area we spent several days explaining to those residents the impacts of the proposed changes and sort their support of this submission. The undersigned residents of Kaka and Kea Streets and Neale, Newall and Bledisloe Avenues, Stoke oppose the designation of our area as a Medium Density Zone and request that Council revise it to a General Residential Zone. Furthermore, we request a minimum side and rear yard setback of 1.5 meters and the provision of at least one car park per residential unit.

1 The Plan would alter the fundamental character of the area we have chosen to live in – a quiet, sunny, well vegetated suburban area.

2 The one size fits all approach favours developers with no account taken of existing residents' lifestyle and viewpoints. There is no right of objection.

3 The plan ignores daylight angles so potentially existing property owners could have, particularly, East and West aspect sun blocked creating frost zones on their North in winter.

Hardly conducive to healthy homes. To some extent orientation on the section in relation to neighbours is of greater importance than just height.

4 The plan ignores the existing property owners' rights to privacy in their own property as prospective buildings can be 1 metre from the boundary and 3 storeys, 12 metres tall.

5 With no obligation to provide parking there will be a serious increase in demand for street parking. In some areas e.g. northern Bledisloe Avenue there is already congestion issues with residents attempting to alleviate this by parking on the berm, which ironically NCC wanted to ban!

Is the strategy to end up selling street parking permits as in Wellington?

6 The development of medium density housing would be random around Stoke as properties become available so 3 story 12metre housing blocks would be popping up throughout suburbia.

7 Currently Stoke has a sensible building footprint to section ratio which allows most of us to maintain a viable garden producing household vegetables and fruit. Given the cost of living this is an important factor. The proposed plan takes no account of such an important activity.

Documents included with submission

Document name Petition

File [planchange29.pdf](#)

Description Signatories in support of this submission

Plan Change 29

We, the undersigned residents of Stoke oppose the designation of our area as a Medium Density Zone and request that Council revise it to a General Residential Zone.

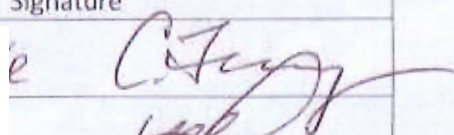
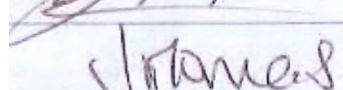
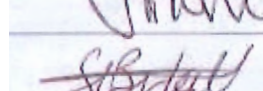
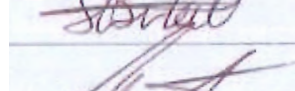
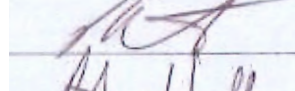
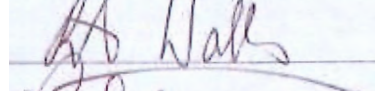
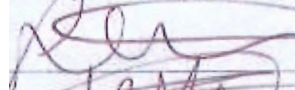
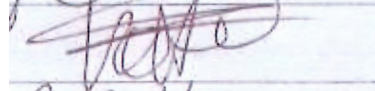
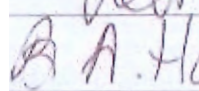
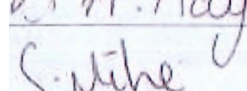
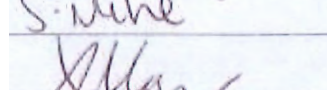
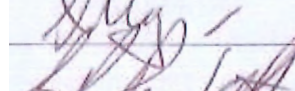
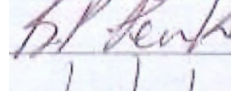
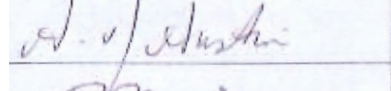
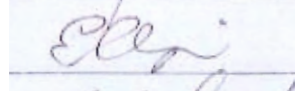
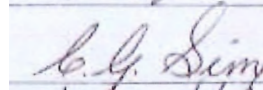
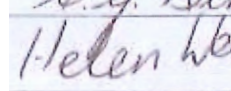
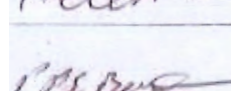
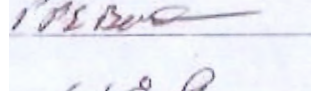
Furthermore, we request a minimum side and rear yard setback of 1.5 meters and the provision of at least one car park per residential unit.

Name	Address	Signature
Ken + Rachel Clapcott		Kelly Clapcott
David Warr		David Warr
Paul + Jenny Hunter		Jenny Hunter
Paul A. Brennan		Paul A. Brennan
HAMISH MURPHY		Hamish Murphy
Ken Wylie		Ken Wylie
Tony Clements		Tony Clements
Stephen Macrow		Stephen Macrow
Greg Ryan		Greg Ryan
Nicola Ricketts		Nicola Ricketts
John + Jo Bryson		John Bryson
A. Carr		A. Carr
A. L. Evans		A. L. Evans
D + D Watson		D + D Watson
Paul Edwards		Paul Edwards
P. Back.		P. Back.
Phil Heine		Phil Heine
Hamish Scoggins		Hamish Scoggins
Stevie-Rae		Stevie-Rae
Heather Park		Heather Park
Alex Park		Alex Park
Leanne		Leanne
Helen Murphy		Helen Murphy

Plan Change 29

We, the undersigned residents of Stoke oppose the designation of our area as a Medium Density Zone and request that Council revise it to a General Residential Zone.

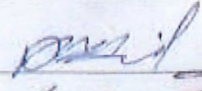
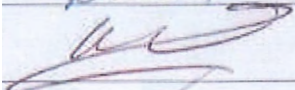
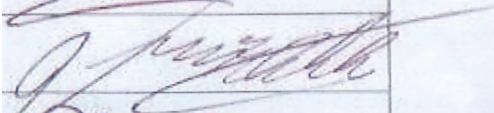
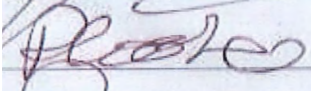
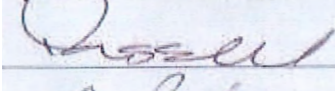
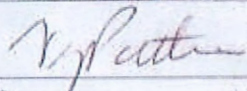
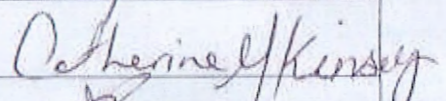
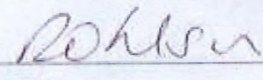
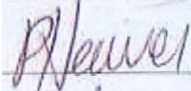
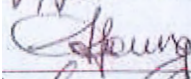
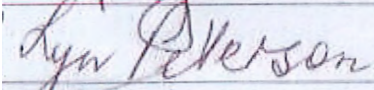
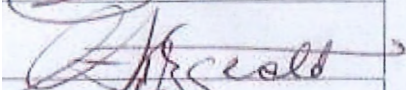
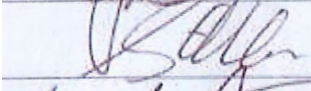
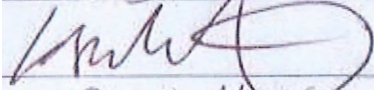
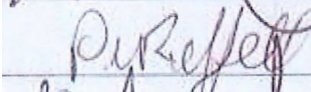
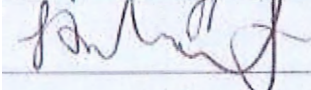
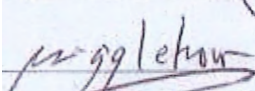
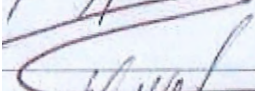
Furthermore, we request a minimum side and rear yard setback of 1.5 meters and the provision of at least one car park per residential unit.

Name	Address	Signature
Cathie Fearey		
Diane Cooko		
Melissa Jury		
Marianna Deynzer		
Corey Shaw		
Jayne Lomax		
Sue Bckett		
Tony Bckett		
AA Walls		
Jean		
Kate P		
B. A + H. P Haycock		
S. Milne		
STUART MAYER		
Bernard Penketh		
Ray + June Austin		
Liz Oldridge		
OLIVIA SIMPSON		
Helen West		
PETER BARNETT		
Angeline Johnston		
Blair Atkinson		
Mark Christieson		

Plan Change 29

We, the undersigned residents of Stoke oppose the designation of our area as a Medium Density Zone and request that Council revise it to a General Residential Zone.

Furthermore, we request a minimum side and rear yard setback of 1.5 meters and the provision of at least one car park per residential unit.

Name	Address	Signature
Deanna Bird		
Rob Gault		
John McHale		
Rebecca Cooke		
Di Russell		
Vern Patten		
Catherine Kinsey		
ANTONY T. JOY		
ROHLSON		
Anitesh Deddy		
Paula Heuvel		
Julie Young		
Lyn Peterson		
Ash Baigent		
ANNE FITZGERALD		
CHRIS PIERSON		
Susan Allen		
Kyle Whiting		
Pam Ruffell		
Linda Whiting		
Raguel Siggelkow		
Caplan Quigley		
Wayne McQuinn		
ADRIAN PARKS		

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S511
Submitter Name	Tim Houston
Submitter first name	Tim
Submitter surname	Houston
Submitter is contact	Yes
Email	tas.houston@gmail.com
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose in part		We want the Nelson City Council to halt all proceedings in relation to Plan Change 29 before restarting the entire process, commencing within widespread, open, and democratic, public consultation and planning.

We are supportive of more intensification in Nelson, but this plan is too extreme and does not consider existing residents' needs, health, and happiness. The plan also lacks detailed analysis of infrastructure demands that will come from the proposed plan. Some of the reasons for this are listed below:

Buildings greater than two stories would cause almost total loss of sunlight to our house and garden. During winter we have approximately 3-4 hours of sunlight on our deck. This would be completely gone with a 3-6 story building on our north side, and it would severely decrease our sunlight during spring and autumn as well.

Greater than two stories would cause a significant loss of privacy to our family which would negatively impact us.

Turning the inner suburbs into 3-6 level apartments would drive away families, with children or other dependents, and pets. The projected growth does not consider that many people moving to Nelson do so to give their families a better lifestyle. In Nelson a family like ours can walk to town, walk to primary and secondary schools. In the future, we hope our children can safely cycle to school. Families like ours look for houses with enough space for children, pets, and parents, plus a garden space to enjoy.

The Plan appears to lack any meaningful analysis of the proposed zones including the effects of intensification on roading, infrastructure, travel corridors etc. The major factor in zone determination appears to be based on how long it takes to walk to the CBD. This is an extremely blunt instrument by which to radically transform a city.

Possible alternatives to Plan29 that would allow for more intensification:

Look to the CBD. There are so many derelict buildings in the CBD that could be developed into apartments. The north side of Selwyn Place by McDonalds could be completely transformed into apartments with the lower level as shops. The Mid-City Motel on Trafalgar Street could be completely redeveloped as apartments. These options would not negatively impact existing residents and the intensification in residential areas could be eased back to two story apartments and townhouses.

An in-depth analysis of vacant, underutilised, and in-efficient building should be undertaken as a way to identify areas for targeted intensification, as opposed to designating entire established suburbs for intensification.

Consider building higher apartments along main transport corridors such as Waimea Road and lower Rutherford Street. Again, there are many buildings along here that are not adding value to the CBD. An example being Hot Springs Spa building – why does this need to be in the CBD? This entire site could house hundreds of people. Why do we need some many car yards on Waimea Road within walking distance to the CBD? These should be moved to commercial and industrial areas.

Again, targeted analysis of prime intensification land needs to be considered.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S512
Submitter Name	Nelson Tasman Climate Forum
Submitter Company/Group Name	Nelson Tasman Climate Forum
Submitter is contact	Yes
Email	joanna.santabarbara43@gmail.com
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General support	Amend	Reasons are attached to each point made.	

Overview

Nelson Tasman Climate Forum is a regional organisation concerned about a just transition to a society and economy within planetary boundaries.

Before assuming that the city can function with thousands of extra people, we would ideally first calculate the carrying capacity of the city and region. This is a matter of regional resilience in the face of climate and earthquake disasters.

We support Plan Change 29 because we are concerned about climate change and see that housing intensification in the central city is one of the key tools that council has to respond to this threat. Smaller, higher and more compact housing has the potential to save energy, use resources more efficiently, and enables residents to live without a car, which in turn reduces the need to build new roads. It takes the pressure off subdividing greenfield sites on the outskirts of town. Building higher over an exposed permeable surface will also bring some defence against flood hazard and is an adaptation to extreme weather events. We also support plan change 29 from a housing equity perspective. We need more affordable housing in Nelson. It's the workers in Nelson who keep this city going, yet many of them struggle with housing affordability and insecurity. Building more houses, especially a mixture of housing types will help address the housing crisis.

We support the concept of the 15 minute city, in which all basic amenities can be reached within 15 minutes of active or public transport.

In addition we wish to strictly limit greenfield development as it converts habitat of other species for human use and in some cases uses scarce high quality agrarian land.

Specific provisions we support are:

1. The creation of the new housing zones to allow greater height and density close to the central city area and around key transport links. This is essential for climate change, resource efficiency and housing justice.
2. The requirement for cycle parking in new developments. Nelson is developing excellent biking infrastructure and we want bike culture to thrive. This is critical from a climate change perspective but will reduce the future costs of road widening and road repairs to accommodate increases in traffic. We approve the omission of minimum car-parking requirements

3. The increase to allow three residential units as a permitted activity per site. With more people interested in living in tiny houses or in simple sleep-outs, allowing three residential units enables more households to help out with the housing crisis by providing extra housing on existing sites.
4. The requirement for developments with 10 or more units to have at least 10% accessible units on the ground floor.
5. Papakāinga housing being a permitted scheduled activity in all zones. Māori are disproportionately suffering from housing inequity and poverty yet are also significant landowners and have a unique position in Aotearoa as tangata whenua. Making it easier for them to build housing on their own land, in a way that is culturally meaningful for them is essential for redressing the injustices of the past and for becoming a good partner in Te Tiriti.
6. Allowing residential units on the first floor of all building in the inner city, inner city fringe, and suburban commercial zones. Many young people and single people would be happy to live in the central city areas above shops and businesses. This would bring more life to the city centre as well as providing more varied and interesting accommodation types in Nelson.
7. Increasing the area covered by slope instability zoning so that council can bring greater scrutiny to the types of development that takes place in these areas. Allowing Council to more thoroughly vet all building in areas where there is an elevated risk is a key tool in reducing future risk.

We would like Council to make the following amendments:

1. We are concerned about the process of this plan change, and ask whether there is an overall vision for Nelson over the next 50 years. We wonder if we could develop more fine-grained plans for neighbourhood development taking into account specific features such as location, aspect, topography, access to services and amenities, overland flow paths, flood protection and watercourses, infrastructure, significant trees and vegetation, heritage items, aesthetics of street view and commercial aspects like land value vs. capitalisation. Each urban block needs careful consideration to find the best way forward and consultation with those living and working there. We support the submission of Nelson Tasman 2050, which elaborates on this point.

Documents included with submission

Document name	NTCF Submission on PC29.
File	ntcfsubmissiononpc29..docx
Description	The text contains all the points made by Nelson Tasman Climate Forum on PC29.

2. To have efficient use of resources be an assessment criterion for residential units in the residential, inner city and suburban commercial zones. It should be signalled to all developers that building efficiently matters - just in the materials that they use, but also in the way they make use of space.
3. Designate car dealerships and car showrooms as industrial activity to free up central sites suitable to medium density residential living. This would create more vibrancy and amenity close to the city centre.
4. Make it easier to convert first floor space into residential units by amending ICr40A to: Residential units are permitted if a) the building contains windows on the wall of a living room and bedroom of a residential unit. There should be as few barriers as possible to converting under-utilised inner-city space into accommodation. Having minimal outlook space tends to lower the price of accommodation, which will fill a need for low cost or short-term rentals.
5. Include allowing EV charging stations as a permitted activity in parking spaces in all zones where there is sufficient extra space in the parking stalls.
6. Allow perimeter block housing on streets with road frontage, where building out to the boundaries is permitted and accepted by neighbours either side.
7. We would like to see more consideration of increased tree-covered areas in the urban landscape to add to the shade, cooling and permeability of the urban area.
8. We would support all paving on suburban sections to be permeable.
9. The storage of hazardous substances in any zone exposed to natural hazards such as flooding, land slip or liquefaction should not be permitted. Christchurch and Hawkes Bay experiences make this regulation's rationale very obvious.
10. Don't put people in harm's way; 'don't build in dumb places'. Plan Change 29 must be conceived in the light of our projections for increasing climate change impacts and the high costs of repair and restoration these incur.

In conclusion

We would like Council to approve an amended Plan Change 29 as an essential tool for addressing three of the most critical issues of our time – climate change, housing inequality and loss of habitat for other species in favour of expansion of human-altered landscape. Making the right decisions now will improve the wellbeing of many generations to come.

NELSON TASMAN CLIMATE FORUM'S SUBMISSION TO NCC ON PLAN CHANGE 29.

Overview

Nelson Tasman Climate Forum is a regional organisation concerned about a just transition to a society and economy within planetary boundaries.

Before assuming that the city can function with thousands of extra people, we would ideally first calculate the carrying capacity of the city and region. This is a matter of regional resilience in the face of climate and earthquake disasters.

We support Plan Change 29 because we are concerned about climate change and see that housing intensification in the central city is one of the key tools that council has to respond to this threat. Smaller, higher and more compact housing has the potential to save energy, use resources more efficiently, and enables residents to live without a car, which in turn reduces the need to build new roads. It takes the pressure off subdividing greenfield sites on the outskirts of town. Building higher over an exposed permeable surface will also bring some defence against flood hazard and is an adaptation to extreme weather events. We also support plan change 29 from a housing equity perspective. We need more affordable housing in Nelson. It's the workers in Nelson who keep this city going, yet many of them struggle with housing affordability and insecurity. Building more houses, especially a mixture of housing types will help address the housing crisis.

We support the concept of the 15 minute city, in which all basic amenities can be reached within 15 minutes of active or public transport.

In addition we wish to strictly limit greenfield development as it converts habitat of other species for human use and in some cases uses scarce high quality agrarian land.

Specific provisions we support are:

1. The creation of the new housing zones to allow greater height and density close to the central city area and around key transport links. This is essential for climate change, resource efficiency and housing justice.
2. The requirement for cycle parking in new developments. Nelson is developing excellent biking infrastructure and we want bike culture to thrive. This is critical from a climate change perspective but will reduce the future costs of road widening and road repairs to accommodate increases in traffic. We approve the omission of minimum car-parking requirements.
3. The increase to allow three residential units as a permitted activity per site. With more people interested in living in tiny houses or in simple sleep-outs, allowing three residential units enables more households to help out with the housing crisis by providing extra housing on existing sites.

4. The requirement for developments with 10 or more units to have at least 10% accessible units on the ground floor.
5. Papakāinga housing being a permitted scheduled activity in all zones. Māori are disproportionately suffering from housing inequity and poverty yet are also significant landowners and have a unique position in Aotearoa as tangata whenua. Making it easier for them to build housing on their own land, in a way that is culturally meaningful for them is essential for redressing the injustices of the past and for becoming a good partner in Te Tiriti.
6. Allowing residential units on the first floor of all building in the inner city, inner city fringe, and suburban commercial zones. Many young people and single people would be happy to live in the central city areas above shops and businesses. This would bring more life to the city centre as well as providing more varied and interesting accommodation types in Nelson.
7. Increasing the area covered by slope instability zoning so that council can bring greater scrutiny to the types of development that takes place in these areas. Allowing Council to more thoroughly vet all building in areas where there is an elevated risk is a key tool in reducing future risk.

We would like Council to make the following amendments:

1. We are concerned about the process of this plan change, and ask whether there is an overall vision for Nelson over the next 50 years. We wonder if we could develop more fine-grained plans for neighbourhood development taking into account specific features such as location, aspect, topography, access to services and amenities, overland flow paths, flood protection and watercourses, infrastructure, significant trees and vegetation, heritage items, aesthetics of street view and commercial aspects like land value vs. capitalisation. Each urban block needs careful consideration to find the best way forward and consultation with those living and working there. We support the submission of Nelson Tasman 2050, which elaborates on this point.
2. To have efficient use of resources be an assessment criterion for residential units in the residential, inner city and suburban commercial zones. It should be signalled to all developers that building efficiently matters - just in the materials that they use, but also in the way they make use of space.
3. Designate car dealerships and car showrooms as industrial activity to free up central sites suitable to medium density residential living. This would create more vibrancy and amenity close to the city centre.
4. Make it easier to convert first floor space into residential units by amending ICr40A to: Residential units are permitted if a) the building contains windows on the wall of a living room and bedroom of a residential unit. There should be as few barriers as possible to converting under-utilised inner-city space into accommodation. Having minimal outlook space tends to lower the price of accommodation, which will fill a need for low cost or short-term rentals.

5. Include allowing EV charging stations as a permitted activity in parking spaces in all zones where there is sufficient extra space in the parking stalls.
6. Allow perimeter block housing on streets with road frontage, where building out to the boundaries is permitted and accepted by neighbours either side.
7. We would like to see more consideration of increased tree-covered areas in the urban landscape to add to the shade, cooling and permeability of the urban area.
8. We would support all paving on suburban sections to be permeable.
9. The storage of hazardous substances in any zone exposed to natural hazards such as flooding, land slip or liquefaction **should not be permitted**. Christchurch and Hawkes Bay experiences make this regulation's rationale very obvious.
10. Don't put people in harm's way; 'don't build in dumb places'. Plan Change 29 must be conceived in the light of our projections for increasing climate change impacts and the high costs of repair and restoration these incur.

In conclusion

We would like Council to approve an amended Plan Change 29 as an essential tool for addressing three of the most critical issues of our time – climate change, housing inequality and loss of habitat for other species in favour of expansion of human-altered landscape. Making the right decisions now will improve the wellbeing of many generations to come.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S513
Submitter Name	Ray Barley
Submitter first name	Ray
Submitter surname	Barley
Submitter is contact	Yes
Email	rayhiprayster@gmail.com
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
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Entire Plan Change	General opposition	Oppose in part	Plan Change 29 contains a new rule (REr. 43A) which requires all new dwellings, additions and significant alterations to existing houses within 100m of the State Highway to be acoustically insulated to achieve 40dBA internally with the acoustic design to be provided to the council with the building consent. If it is necessary to have the doors and windows closed to achieve 40dBA then mechanical ventilation must be installed. A habitable room includes all rooms except the bathroom toilet laundry and wardrobes. 40 dBA is a fairly tough standard to meet. This idea is misguided, and takes responsibility away from the entity responsible - Transport NZ Most of the noise from the badly constructed and poorly maintained highway (SH6) is deflected from me by the house in front. However the vibrations from (legally) overloaded truck and trailer units (for which this road was never designed) create massive vibration waves, rattling windows and creating shock impacts which can be felt by anyone in the house, creating a feeling of living in a war zone, with loud crashes, rumblings, and sharp shocks. A very common question here is, "was that an earthquake?" From an environmental point of view, - requiring the use of mechanical ventilation systems over passive options is flawed planning. From a planning point of view, this rule would add significant costs to any renovations or builds, and increase the workload and complexity for consents and compliance. The NZTA Guidance assesses the financial cost of acoustically insulating a new or existing dwelling at between \$27,250 and \$7,250 depending on whether it is single or double storey and the distance back from the road (Figure 16 NZTA Guidance). Given that these are 2013 figures, exclude GST and do not include the cost of the design report prepared by the suitably qualified and experienced acoustics consultant as required by proposed rule REr. 43A.1 the financial cost to homeowners will be substantially greater than the NZTA figures.	remove rule (REr. 43A)
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Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S514
Submitter Name	Nicholas Adams
Submitter first name	Nicholas
Submitter middle name	Robert
Submitter surname	Adams
Submitter is contact	Yes
Email	nick@nickadams.co.nz
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Residential Zones	High Density Residential Zone	Oppose		What do I want Council to do? 1. Do not rush into allowing this major change without considering what the finished landscape could look like. Develop a better vision of how it would actually be in the future. Or how we would want it to look in the future. Then change the rules to facilitate that. 2. Develop the inner and fringe city areas first where: c. Commercial buildings are already in existence, d. The number of single dwelling residential housing is relatively small, e. Consider allowing much higher buildings here. f. The existing green spaces are limited, g. People living in the city center will reinvigorate it. 3. Consider other ways to solve the problem of lack of housing aside from a potential blanket of 6 story apartments. For instance if multi story buildings are to be built then consider how they could be built to allow visual and physical avenues for sunlight, distance views and greenery. If this was done well it could achieve most of what is needed. 4. Give the community more opportunity to have a real input into developing the new rules. This would not be dissimilar to water catchment groups in rural settings.

Reasons

1. I don't see the Councils vision and leadership (I am sure it is there). It appears to me that it is just change the rules and let the individual property owners do the rest. This seems quite hopeful. And hope is not a strategy.

2. The definition of the recession planes could be clearer. Example drawings would help explain.

3. The biggest effects of increasing the heights of residential housing to 3 or 6 stories are:

a. The future reduction of sunlight to neighboring properties and to most of the inhabitants within the new buildings. This will be particularly negative during winter months.

b. A big reduction in views of green-scapes. Currently the view I have is of the Matai hills and a general surrounding vista of trees. There is considerable evidence that green-scapes have considerable positive mental and physical health outcomes. These studies have that differing socio-economic conditions from neighborhood to neighborhood are not a factor.

c. Potentially there will little or no natural avenues to allow light, greenery and views to permeate to all dwelling.

Rev 0.1

MUST be sent or delivered by 31/10/23 4pm to:

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

Environmental.planning@ncc.govt.nz

Submitter

Full Name: Steven James Langford

Telephone:

Email: steveandmargot@gmail.com

Signature of Submitter:



Date: 31/10/2023

Delete as applicable: -

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

I WISH/~~DO NOT 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 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.
- c) 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.
- d) Many people I have spoken to in areas that will become High or Medium density are completely unaware of this change apart from a vague understanding that something is happening
- 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 Councillors from either side of the Sept 14th vote.

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 with care. 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 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.
- d) Contemporary Black Iron Clad Boxes, built only a few metres from 120-year-old Historic Homes is a thoughtless lack of 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 some of our older neighbourhoods. They help considerably with the wellbeing of the residents and help to provide an essential part of the attraction of Nelson, which must all be considered during developing the growth of Nelson.
 - i) 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.
 - ii) 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. It is not called the 'Sunshine Capital of NZ' for no reason. It is well documented that people relocate to Nelson because of the Sun and accept reduced wages called 'Sunshine Wages' for that privilege.
- b) Our house currently gets all day sun in winter allowing us to use almost no heating during winter days and to dry washing outdoors on all but the worst winter days. If our neighbours to the north built to even a fraction of the maximum allowable 6 storeys with no protection of our daylight this would have a massive impact on the liveability of our house
- c) 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/>
- 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: -
 - i) Increased levels of mental health illness, anxiety and stress.
 - ii) Increased levels of damp homes with associated mould and mildew and respiratory illnesses.
 - iii) Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.
 - iv) Increased heating costs, air pollution, carbon footprint, are all exasperated due to a large portion of Nelson housing is old, with un-insulated walls and single glazing and open fires were legislated out of use many years ago.
 - v) Reduction in property values and increased financial stress, because the house would be less desirable to live in.
 - vi) Residents, struggling with the cost-of-living crisis may not afford to heat their home.
 - vii) 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 daylight 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 encourage 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, Inner City should be the starting place to have the most significant intensification, before forcing it onto the residential neighbourhoods, this can give more time to complete a better design vision for our residential neighbourhoods.

- i) I ask Council to make better utilization 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.
- 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.

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 carparking

- 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.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S516
Submitter Name	Margaret SODERBERG
Submitter first name	Margaret
Submitter middle name	ELAINE
Submitter surname	SODERBERG
Submitter is contact	Yes
Email	marg.soderberg@gmail.com
Wish to be heard	No
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose	Please see attached submission document	I request that NCC vote against Plan 29 and restart the process to better consult with the community

Documents included with submission

Document name	M Soderberg submission on PAn 29
File	margaretsoderbergsubmissiononplan29.docx
Description	

Margaret Soderberg Submission

Proposed Plan Change 29

30 October 2023

I do not wish to be heard

I oppose Proposed Plan Change 29 in its entirety.

1. Summary of Submission

- 1.1. Consultation has been inadequate for a Plan Change of this magnitude and the number of documents; the time period has been too short, engagement with affected communities has been insufficient.
- 1.2. PPC29 has the potential to seriously affect the character of Nelson, a key attribute with economic, social and environmental consequences; amenity and value in the CBD and residential areas will be lost if it goes ahead. Some level of intensification is required but this is a disproportionate response to established need and the local market
- 1.3. It is inconsistent with:
 - 1.3.1. Te Taihu Intergenerational Strategy
 - 1.3.2. Te Ara Whakatū, Council's Spatial Plan
 - 1.3.3. Future Development Strategy
 - 1.3.4. Taonga Tuku Iho Strategy
- 1.4. The link between intensification and affordability cannot be proven; the proposal does not demonstrate that it will result in affordable houses. No social impact study has been undertaken to support the proposal. Developers are not highly regarded for providing sustainable affordable housing.
- 1.5. Poor amenity values will eventuate with a lack of parking, inadequate public transport to support carless homes, greenspaces for families to use and general infrastructure within the city to support intensification.
- 1.6. While some level of intensification is needed this should be limited to the inner city. The links between intensification and affordability are dubious especially for larger families.
- 1.7. No evidence about where the housing need is – large families, single elderly, couples?
- 1.8. What analysis has been done on empty houses within Nelson – we have several homes lying empty within a short distance of our home with overseas owners who use infrequently and provide no or little economic value to our city.
- 1.9. Hearing Panel makeup needs to be reviewed due to perceived conflicts of interest.
- 1.10. The city has limited opportunities for transition points between the levels of high-rise building. We are to be in a heritage precinct with lots of restrictions and then can have 6 stories across the road with little protection for the impact on the heritage precinct.

If the Plan Change proceeds:

2. Decisions sought:

Intensification

- I. The withdrawal of the intensification provisions of Proposed Plan Change 29.
- II. Undertaking a new precautionary, staged approach to planning a level of intensification as signalled in the FDS evaluation reviews.
- III. Highest level of residential intensification outside current CBD to be two x 2 storey houses on one section with amenity controls and resource consent required.
- IV. Develop rules to allow 2 dwellings within one house in larger properties with amenity controls in NRMP
- V. **Retain the daylight controls to provide sunlight and daylight requirements.**
- VI. Development of new intensification plans to be based on:
 - New best practice, peer reviewed, population projections
 - A full economic study of proposed intensification (residential and commercial)
 - Social impact study
 - Quantitative impact assessments (e.g. amenity, character, effect on communities)
 - Sustainability and infrastructure impacts
 - Effect on heritage resources
 - Meeting Council's legal obligations with respect to heritage resources
 - An independent character assessment of Nelson, encompassing listed heritage areas in NRMP
 - Development of a cohesive, design strategy for Nelson to inform CBD intensification provisions.
 - Development of neighbourhood spatial plans with the community (referred to in Future Development Strategy but not undertaken before Proposed Plan Change 29 was notified).
- VII. Remove the proposed HDZ and MDZ from all land currently zoned residential and reinstate amenity controls in NRMP including daylight and setbacks.
- VIII. Medium density zoning to be restricted to the Inner City and Inner-City Fringe Zones.
- IX. Plan for regular reviews of the FDS to incrementally provide for intensification if demand is established.
- X. Notwithstanding the above, retain existing amenity controls in residential zones, including setbacks and daylight controls.

Replace the 2 councillors on the hearing panel with independent commissioners due to perceived conflicts of interest.

Other matters:

- The breadth of change proposed is significant. There is a considerable amount of information to study before being able to respond meaningfully to the proposal. For this reason, non-statutory consultation prior to the notification of the Plan Change was inadequate.
- The population projections used to set the level of housing demand have not been demonstrated.
- No overall design guide has been developed for Nelson including spatial neighbourhood plans to be developed in consultation with the community.
- This level of intensification is not required by National Policy Statement – Urban Growth because Nelson is a Tier 2 urban area. This Plan Change is adopting a Tier 1 level of intensification.
- The plan 29 outcomes will result in apartments springing up in random locations, with all households/property owners living with the uncertainty of when a developer might buy the neighbouring house and forever reduce their amenity/sunlight.
- The Inner-City Zone (PPC29) has a lot of vacant space with concerns about its economic viability. This is the ideal space for intensification.
- Currently 44% of the Inner-City Centre zone is used for car parking which could be consolidated in a more land efficient way. The current parking is lazy development by NCC. Increased residential activity in the inner city is likely to activate more demand for retail and hospitality services. High density zoning is not required in residential zones if this space is available and utilised.
- I support a level of intensification that would allow an additional 2-bedroom housing unit on existing properties and there are some very good examples of residential intensification in Nelson. These have been carefully planned and designed. Most are 1, 2 or 3 storey where a series of town houses replace old poorly insulated, poorly built houses. These areas could be identified through neighbourhood spatial planning not a heavy-handed approach as indicated the Plan 29.
- Nelson relies on its unique character to attract residents, visitors and investment. The FDS states 'some areas have a unique character that should be maintained'. Aside from heritage precincts (and with two being proposed to be deleted) no character areas have been identified through the Proposed Plan Change process.
- The Proposed Plan Change 29 has potential to ruin the attractiveness of Nelson to residents, visitors, investors and high value employees – it could allow it to become an ugly town. Developers are not known for providing high quality affordable housing.
- If people do buy a house in Nelson they are at risk of a 6-storey apartment being built next door at any stage, as of right, which must make moving to Nelson less attractive to those very people we wish to attract.
- There is no doubt that many character and heritage buildings would be lost as an intended or unintended consequence of this proposal and that is what contributes to Nelson's character.
- If carefully planned a level of intensification can provide a measured response to Climate Change e.g. by siting more intense housing within/as close to the Inner-City Zone next to walking, cycling and public transport routes and workplaces. While good advances have been made to Public Transport it is certainly not at a standard

to support significant levels of carless homes who need to access supermarkets and big box stores nearer the airport. People will still have cars which must be accommodated on the streets surrounding the developments creating traffic and safety issues for cyclists.

- Daylight and outside space will be minimised. Nelson is renowned for quality of life and sunshine hours. This proposal undermines that considerably.
- Comments at the recent meetings indicated Nelson South has lots of greenspace – we do not have parks that are suitable for families or accessible for elderly. There are no family friendly parks in Nelson South apart from Fairfield which is not level and elderly appropriate. There is no park in the inner city for lunchtime workers to use such as Midland Park in Wellington.
- The layout of the city does not provide for sufficient transition points between residential and potential 6 storey developments. We live in a heritage precinct and could potentially have a modern poorly designed 6-storey development directly across the road on our northern boundary shading our homes. That will totally impact the heritage value.
- I am concerned about the number of family homes that are being purchased for Air BNB or land banked by overseas investors and not available for people to live in. Some study of this needs to be undertaken and the impact of National and local policy on housing availability in Nelson. There are a significant number within walking distance of our home. This changes the economic viability of the city.
- NCC need to include a plan to mitigate against future drought situations with a greater demand on the water from the Maitai Dam from greater population, and the increased capacity requirements for our waste water and storm water systems.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S517
Submitter Name	megan courtney
Submitter first name	megan
Submitter surname	courtney
Submitter is contact	Yes
Email	megan.matt@slingshot.co.nz
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Subdivision	Residential Zones	Amend	These changes will better provide for a risk based approach anticipated by the RMA and will ensure intensification requirements of the NPS Urban Development are met.	Make subdivision in Slope 3 a controlled activity to recognise that the risk is less than Slope 2 Exclude sites that have minor slope 3 coverage Ensure unit title development is not captured by slope controls particularly when development can occur within an existing building
Residential Zones	Other	Amend	This is more reflective of the policy direction of the NPS Urban Development	Amend RE2.9 as follows: <i>Enable development of existing or new sites to create a level of amenity for residents within and adjoining a development that reflects the outcomes anticipated within the relevant residential zone.</i>

Residential Zones	Other	Amend	This better reflects the policy direction of the NPS Urban Development and provides a clearer direction for the new policies introduced via PC29	Amend objective RE1 to better reflect the changes to PC29 as follows: <i>Provide a diversity of residential styles based on the differing characteristics of areas of the city, and differing community needs.</i>
Residential Zones	Other	Amend	Enabling medium density residential living within walking distance of public transport stops will better achieve the policy direction of the NPS Urban Development and help support the provision of public transport. This will also help provide climate change resilience, particularly in locations free of natural hazard risk. These changes will also help alleviate concerns about 6 storey development that have been raised by the community.	Amend Policy RE1.7 as follows: <i>Enable medium density residential living that increases housing supply and choice on <u>land</u> within walking distance of the Inner City, City Fringe, public transport stops, and Suburban Commercial zones with a planned built character of residential <u>buildings</u> generally up to three storeys; with supporting small scale <u>commercial activities</u>.</i> <i>Rezone areas that are within in a walkable catchment of public transport stops and free of natural hazard risk to medium density residential living that enables 3 units and three to four storey development.</i> <i>Amend bulk and location controls to enable these changes.</i>
Residential Zones	General Residential Zone	Oppose	The NPS-UD has removed mandatory requirements for carparking. Consequently there should be no requirement for an 85 percentile vehicle in the front yard	Delete REr.17D (d)

Residential Zones	Other	Amend	This will better reflect the risk based approach to natural hazards required by the Resource Management Act (RMA) and enable the intensification outcomes anticipated in the NPS Urban Development and residential and commercial land capacity requirements of the RMA.	Delete Slope instability area 3 provisions and rename slope instability controls area 1 and 2 based on high and medium risk. If slope 3 is to be retained show this at a scale so that individual parts of properties can be identified as at risk as per preliminary mapping. Rename low risk instability areas and make relevant rules more enabling.
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Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S518
Submitter Name	Anne Chilcott
Submitter first name	Anne
Submitter surname	Chilcott
Submitter is contact	Yes
Email	annechilcott@gmail.com
Wish to be heard	Yes
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose	Future Development Strategy Plan, which was worked on alongside TDC, should be continued and not sidelined. Plan Change 29 can be re-worked, giving time for each area of medium/high-density zones to have meaningful consultation. Having a plan thrust open the residents is not the way to build the kind of city which we all want to live in. It's imperative that existing neighbourhoods' wellbeing is not destroyed for the quick-fix of being able to say there's another 500 apartments/homes coming on line. Shared vision with TDC makes a lot of sense. I wholeheartedly agree with Timo Neubauer's suggestions in his recent opinion piece in the Nelson Mail. I urge the Council to listen to their residents and take all the time needed to get this right.	Withdrawal of Plan Change 29 and reconsideration and review carried out, when the individual neighbourhoods have been consulted and demographics considered.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S519
Submitter Name	Damien Taylor
Submitter first name	Damien
Submitter surname	Taylor
Submitter is contact	Yes
Email	damienandjamie@hotmail.com
Wish to be heard	No
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose in part		Reversal of area 2 overlay for 7C Andy Whiting Place, Stoke

29 - 7C Andy Whiting Place

I am writing to formally submit my opposition to Plan Change 29, particularly in relation to its impact on my property located at 7C Andy Whiting Place. I am deeply concerned about the proposed changes and their potential adverse effects on my property. I kindly request that my submission be considered in the decision-making process for Plan Change 29.

1. Geotechnical Certification:

I would like to emphasize that my property, 7C Andy Whiting Place, has undergone rigorous geotechnical assessments and has been certified as stable for development. The existing geotechnical certification should serve as a testament to the safety and suitability of the site.

2. Increased Costs and Administrative Burden:

The proposed rules in Plan Change 29 would result in additional administrative burden and cost implications for property owners like myself.

3. Request for Amendments:

In light of the above concerns, I respectfully request that Plan Change 29 be reconsidered, and that the following amendments be made:

Recognize existing geotechnical certification for properties and exempt them from the new resource consent requirements in the Slope Instability Area 2 Overlay.

Ensure that the proposed rules strike a fair balance between safety and development, taking into account the existing assessments of the properties.

Provide clear guidelines for the process of obtaining resource consents, including realistic timeframes and transparent criteria for approval.

Encourage sustainable development by promoting the efficient use of land resources while ensuring public safety.

4. Conclusion:

I strongly oppose the proposed Plan Change 29, particularly the implications for my property at 7C Andy Whiting Place. The onerous restrictions and requirements introduced by the plan change threaten to hinder property development, impose unnecessary costs, and create an administrative burden. I urge the local authority to consider the concerns of property owners and make amendments that strike a fair balance between safety and development.

I appreciate your attention to this matter and kindly request that my submission be considered during the decision-making process. I am available for further discussions or to provide any additional information that may be required.

Thank you for your time and consideration.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S520
Submitter Name	Vanessa Hardinge
Submitter first name	Vanessa
Submitter surname	Hardinge
Submitter is contact	Yes
Email	vanessahardingenz@gmail.com
Wish to be heard	No
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Residential Zones	Medium Density Residential Zone	Oppose	The changes will impact areas that are considered iconic of Nelson, the views of the harbour when walking on Princess Drive or any street on the hills along the harbourfront (Britannia Heights neighbourhood). This particular neighbourhood is seen as an iconic part of Nelson and housing intensification will spoil it for residents and tourists. I strongly urge the council to reconsider these changes and allow any future development under the existing regulations and ask the Council to maintain the AP15 Daylight Admission protection rules for all pre-existing properties. This will allow pedestrians (tourists and residents) to continue to have a view of the sea while they walk around the neighbourhood. This harbourfront neighbourhood should be preserved as a proud symbol of Nelson.	Submission to plan Change 29. This submission is to oppose the proposed plan changes due to the negative effects this will have on existing properties. I strongly oppose changes to daylight angles/ recession planes, and boundary adjustments in the general residential zones.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S521
Submitter Name	Marina White
Submitter first name	Marina
Submitter surname	White
Submitter is contact	Yes
Email	minetta.whit@gmail.com
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Inner City and City Fringe Zones	Inner City Zone	Oppose	As stated in the above	I OPPOSE Plan Change 29 and urge you to STOP this plan and rethink more environmentally friendly, community-minded, and friendly alternatives. This mass infill proposal will inevitably lead to loss of sunlight and daylight, the right of every human! That a property owner does not have the right to any notification of development next door is iniquitous! The whole scheme is a developers' delight, the types of infill buildings that they are proposing will lead to a mishmash of heights among present residential properties. They have plans to develop housing without car parking, this is completely unfeasible in this type of city. Especially while the public transport infrastructure in the wider region is not sufficient. Very little consideration has been given to history or heritage in this proposal. You will disrupt the beautiful tree-covered, unique and vibrant city of Nelson. Instead, I URGE you to consider the following: Matt Lawrey's idea of developing housing on the two existing car parks (Buxton and Montgomery) these are three or four levels of housing above the existing parking areas.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S522
Submitter Name	Annette Win
Submitter first name	Annette
Submitter surname	Win
Submitter is contact	Yes
Email	mark.annette@outlook.com
Wish to be heard	No
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
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Residential Zones	Medium Density Residential Zone	Oppose	1. A number of houses have an instability overlay. 2. There is a fault line running through the area. 3. This area is not central Nelson. We do not oppose intensification per se, but feel it should be limited to the CBD, particularly given the number of empty buildings in the CBD. 4. Safety. This is a narrow section of road heavily used by school children on bikes, yet has no dedicated cycle way. We are concerned that extra cars parked on the road create an additional hazard for our children. Many children in this area are of the primary school age, and are not particularly confident or traffic wise. Adding extra cars (parked or moving) adds additional risk to their safety. The traffic volume on this road has grown over the past few years with housing development up the Brook, and now with buses - neither of which we oppose - but it does pose an increased safety issue. 5. Loss of sunlight. Medium density housing on the eastern side of Tasman Street, plus high density housing on the western side, would mean many houses on the eastern side of the street will not get sunlight from dawn to dusk. This is not acceptable in an existing low-rise residential area, this far from the CBD. The protection provided for under the current residential daylight control rules should be retained as daylight/sunlight is vital to the mental health and wellbeing of property owners/residents/renters etc, that have chosen not to live in the CBD.	Decision sought is Council remove Tasman Street, from Manuka St to Bronte Street on the eastern side from medium density zoning and the western side from high density zoning, and retain the current zoning.
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Entire Plan Change	The Plan Change process	Oppose in part	1. Nelson CBD has lost its vibrancy and has a number of empty buildings. In general there is a feeling of decline. We suggest Council starts with intensification in the CBD, in an effort to revitalise the city. Only then, should further intensification be considered. Intensification of the residential zones should be more considered and designed. 2. The move to intensification needs to be incremental. What is being proposed is too broad and a 'one-size fits all' approach. The potential for negative outcomes on local communities is just too high.	For Council to put the intensification of residential zones on hold, until intensification of the CBD has proven successful.
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Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S523
Submitter Name	Jeanette Spencer
Submitter first name	Jeanette
Submitter middle name	Ann
Submitter surname	Spencer
Submitter is contact	Yes
Email	guavacake2@gmail.com
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose in part	30 October, 2023 Submission Plan Change 29 This submission is in opposition to some aspects of Plan Change 29. I wish to speak to these. I live in Sadlier Street in Stoke, specifically on a corner section right next to Isel Park and Bishops Way. This area is designated for 6 storied buildings in the plan change. (A) Placing six storied apartments next to Isel Park My objection is to six storied apartments being built right next to and overlooking Isel Park. Although I'd personally benefit from the increase in land value of having my 1000m2 corner property rezoned to 6 stories, I would far rather prefer that this didn't happen for the benefit of Isel Park and the community for generations to come. With intensification comes the need to really protect beautiful places for people to gather, and if we loose the harmony and beauty in Isel Park, we can't get it back.	I am in agreement of the need for intensification. My opposition is to a) Placing six storied apartments next to Isel Park. b) Six storied apartments in general

Social Amenity: This area around Isel Park is a small, friendly, quiet and peaceful neighbourhood that is very settled. Having lived here for 11 years, what I notice is how much the Park and Bishops way is used daily by large numbers of the public of all ages, either as a place to visit or as an enjoyable route from one place to another such as to the shops or school.

My observation is that Isel Park is an important part of the wellbeing of the community. I notice that there are people of all ages using the Park for their well being – for example parents with young babies or children getting or children getting out in the fresh air, elderly people walking daily, people who look stressed and tired, people who are connecting with friends and groups, young people going to and from school in safe cycling route, international students gathering together. All ages and ethnicities and all at different stages of life and with different purposes. I can confidently say that the Park is well used and a deliberate destination as it is a lovely place to be in and experience.

I'm now going to talk about something that is not part of Western Culture, which is about the feel of a place. I think most people can relate to places having a certain feel or vibe. We know places that feel great, and we could think of places around the world we wouldn't want to step into. What creates that feel? One word for this, which comes from Chinese culture, although many cultures have a name for it is Qi. This could be like Wairua in Māori culture, however I'm not Māori so I can't speak to that. So what I'll speak to is what I know and experience. Qi is a form of energy and carries information. That is what we feel in places. One way we can understand why we like to visit places that feel good and beautiful – is that we can come away feeling uplifted. Beautiful places improve our wellbeing simply like bathing in a pool of the goodness of nature. Although maybe that explanatory model might not make rational sense, I'm guessing that we can relate to the experience of knowing that good places make us feel good. Isel Park is made of qi that is beautiful – creating a beautiful qifield – that is added to by people walking in there everyday and admiring and enjoying it. That is, Isel Park, including the trees, plants and creatures that live in it, is a living being itself that is celebrated and grows and develops in harmony with the people who love and enjoy it every day.

There is a harmony of nature and people there and this harmony is every changing.

If large apartments are built on Bishops Way and next to Isel Park, they will change the balance of nature. I'm guessing we can understand that. Eg: where there is a headland and a cliff with the sea below – there is a sudden change in nature. On Bishops Way there is a beautiful stream and trees that play music when the wind blows and shower blossoms in the Spring. If there were 6 storied apartments, the whole of Bishops way and the land adjacent would be in shadow – and become very damp. I know this will happen, as I've previous had tall 6m + dense hazelnut trees on my property right next door and they blocked the light and breeze creating a huge amount of damp and dark on the south side and felt oppressive. When I had them removed the different was great, and the space and qifield felt more open, bright and light. This was just with trees that had some light and air move through them. Apartments would be dense and overshadowing – and damage the natural balance hugely. People walking down that path would find themselves in the shadow. It wouldn't be pleasant, certainly not relaxing and nothing like it is now. Similarly, the apartments would overshadow a huge amount of Isel Park, even more as they are on the North facing aspect, upsetting the natural balance of light, breeze and the overall feel.

The beautiful vantage points in the park, where the grass and trees are mixed with the view of the big sky and the mountains would be lost, and the Park would be hemmed in in many ways.

We are also living in a time of technology revolution. I notice a difference from now to 10 years ago, where previously it was common to hear childrn outside playing. Very sadly that is almost unusual now - owing to the effect of devices. From this perspective, it is even more important that there are beautiful places that are enticing for children and young people to visit and experience.

Nature needs balance – and with balance comes a more gentle change. If there were to be 6 storied apartments I would think it better to have them somewhere else – and preserve the area around Isel Park – so that becomes a protected zone –protecting the more natural balance and harmony of the park – so it's not overshadowed –so there is a buffer zone around it of openness that people walk through before they arrive there. A bit like having a bouquet of flowers where the wrapping around them supports the flowers and helps amplify their beauty. In contrast, if we wrapped a bouquet of flowers in a cardboard tube on two sides that was twice the height of the flowers – they really wouldn't be the same and lose their vibrancy. This is just flowers that are gone within days. If we smother the park with high rise buildings – this will in effect be smothering the park permanently. This will damage the qifield – and it will really lose the amazing feel that it has – meaning a loss to people's wellbeing who visit it as well as detrimentally affecting the plants and creatures who live there on land or in the stream.

Our population will rise, and maybe climate change will mean our population will really increase more than we know. If we look now at densely populated urban areas, the places that are parks are real treasures for people, and so important for wellbeing. If we were to put ourselves 20 years or 200 years into the future – what would we prefer? I know I'd prefer to have a beautiful open Park, of which Bishops Way is in effect part of it, rather than one overshadowed by apartments. Our local population is going to be more dense. I believe that significant decisions like changing the qifield of this area and changing the qifield of the Park including the area adjacent to Bishops Way needs to be made with the very best long term planning in mind – with harmony and wellbeing for all as the core driving principle. It needs to be done with love and respect at the core. Let's be wise and preserve this park and the ongoing positive effect on the wellbeing of our community.

This picture (which you can't see as it's on a word doc) of Isel Park is taken from the main grassy area. The mountains can be seen in the distance. The roof of the house, which is single storied is in front of the area that would become six story apartments. The view to the mountains will be lost, along side the sense of openness. As humans, when we have such beautiful views, we naturally enjoy them – it helps us to feel more open and relaxed inside – really improving our wellbeing. This is why we love places with beautiful expansive views. This would be lost.

Again in this image (which you can't see as it's on a word doc) , the expansive view out to the mountains would be lost.

With intensification comes density. For our wellbeing, we need a sense of space and expansion to balance that feeling. I'm sure that's something we can naturally relate to.

(Image which you can't see as it's on a word doc) Dense hazelnut planting 22 Sadlier St which created a significant feeling of damp as they were so tall and blocked light and air flow. The qifield felt blocked and it wasn't pleasant sitting outside.

(Image which you can't see as it's on a word doc) After the hazelnuts were removed, the space became light, expansive and open. The qifield improved and felt better as there was more light and airflow. It became really pleasant to sit outside again.

Natural hazards -Flood Zone:

This area is also a flood zone so not appropriate for intensification at a level of 6 stories.

Pollution:

The densification of six stories in a small area will likely cause more pollution to the adjacent stream.

Māori Tenth's: This area could be relevant to the tenth's case.

Iwi:

This area may have significant to Iwi.

(B) Six storied apartments

Nelson is not required by government to have six storied apartments. This decision is out of balance for the region and will dramatically change the feel of the place. Again, this decision is out of balance for the region. Wise change needs to be made with harmony and balance in mind, to preserve the qifield – and create a qifield that is in balance with nature and is for the benefit of humans and all plants, creatures, waterways, all of nature that reside here. I believe there needs to be well considered planning made that addresses the overall effect of high rise as well as the smaller, micro effects in each street and section. There will be wisdom around this from within humanity. Again I reiterate that I believe that significant decisions like this need to be made with the very best long term planning in mind - with harmony and wellbeing for all as the core driving principle. It needs to be done with love and respect at the core.

IF the zoning for six storied apartments went ahead in the Sadlier Street area, around Bishops Park, I would like to see Bishops Park specifically developed so it became an area for people to safely and harmoniously gather. eg: fencing to make it safe for young children, accessible play areas, food preparation areas eg BBQ, and any other visionary ideas that would make it a warm, safe, loving and harmonious place for people to leave their 6 storied apartments and come together for maintaining and improving wellbeing.

included with submission

File

[submissionplanchange29.doc](#)

Description

Submission as sent in - however this includes photos that help to explain what I am saying

Jeanette Spencer

Guavacake2@gmail.com

31 October 30, 2023

Submission Plan Change 29

This submission is in opposition to some aspects of Plan Change 29.
I wish to speak to these.

An effective submission will state what effects you think the proposal will have, and why you support or oppose the proposal. If you would like to see changes to the proposal, you can suggest alternatives.

I live in Stoke, specifically on a corner section right next to Isel Park and Bishops way. This area is designated for 6 storied buildings in the plan change.

I am in agreement of the need for intensification. My opposition is to

- a) Placing six storied apartments next to Isel Park.
- b) Six storied apartments in general

(A) Placing six storied apartments next to Isel Park

My objection is to six storied apartments being built right next to and overlooking Isel Park. Although I'd personally benefit from the increase in land value of having my 1000m2 corner property rezoned to 6 stories, I would far prefer that this didn't happen for the benefit of Isel Park and the community for generations to come. With intensification comes the need to really protect beautiful places for people to gather, and if we loose the harmony and beauty in Isel Park, we can't get it back.

Social Amenity:

This area around Isel Park is a small, friendly, quiet and peaceful neighbourhood that is very settled. Having lived here for 11 years, what I notice is how much the Park and Bishops way is used daily by large numbers of the public of all ages, either as a place to visit or as an enjoyable route from one place to another such as to the shops or school.

My observation is that Isel Park is an important part of the wellbeing of the community. I notice that there are people of all ages using the Park for their well being – for example parents with young babies or children getting out in the fresh air, elderly people walking

daily, people who look stress and tired, people who are connecting with friends and groups, young people going to and from school in safe cycling route, international students gathering together. All ages and ethnicities and all at different stages of life and with different purposes. I can confidently say that the Park is well used and a deliberate destination as it is a lovely place to be in and experience.

I'm now going to talk about something that is not part of Western Culture, which is about the feel of a place. I think most people can relate to places having a certain feel or vibe. We know places that feel great, and we could think of places around the world we wouldn't want to step into. What creates that feel? One word for this, which comes from Chinese culture, although many cultures have a name for it is Qi. This could be like Wairua in Māori culture, however I'm not Māori so I can't speak to that. So what I'll speak to is what I know and experience. Qi is a form of energy and carries information. That is what we feel in places. One way we can understand why we like to visit places that feel good and beautiful – is that we can come away feeling uplifted. Beautiful places improve our wellbeing simply like bathing in a pool of the goodness of nature. Although maybe that explanatory model might not make rational sense, I'm guessing that we can relate to the experience of knowing that good places make us feel good. Isel Park is made of qi that is beautiful – creating a beautiful qifield – that is added to by people walking in there everyday and admiring and enjoying it. That is, Isel Park is a living being itself that is celebrated and grows and develops in harmony with the people who love and enjoy it every day. There is a harmony of nature and people there and this harmony is every changing.

If large apartments are built on Bishops Way and next to Isel Park, they will change the balance of nature. I'm guessing we can understand that. Eg: where there is a headland and a cliff with the sea below – there is a sudden change in nature. On Bishops Way there is a beautiful stream and trees that play music when the wind blows and shower blossoms in the Spring. If there were 6 storied apartments, the whole of Bishops way and the land adjacent would be in shadow – and become very damp. I know this will happen, as I've previously had tall 6m+ dense hazelnut trees on my property right next door and they blocked the light and breeze creating a huge amount of damp and dark on the south side and felt oppressive. When I had them removed the difference was great, and the space and qifield felt more open, bright and light. This was just with trees that had some light and air move through them. Apartments would be dense and overshadowing – and damage the natural balance hugely. People walking down that path would find themselves in the shadow. It wouldn't be pleasant, certainly not relaxing and nothing like it is now. Similarly, the apartments would overshadow a huge amount of Isel Park, upsetting the natural balance of light, breeze and the overall feel. The beautiful vantage points in the park, where the grass and trees are mixed with the view of the big sky and the mountains would be lost, and the Park would be hemmed in in many ways.

We are also living in a time of technology revolution. I notice a difference from now to 10 years ago, where previously it was common to hear children outside playing. That is almost unusual now – owing to the effect of devices. From this perspective, it is even more important that there are beautiful places that are enticing for children and young people to visit and experience.

Nature needs balance – and with balance comes a more gentle change. If there were to be 6 storied apartments I would think it better to have them somewhere else – and preserve the area around Isel Park – so that becomes a protected zone – protecting the more natural balance and harmony of the park – so it's not overshadowed – so there is a zone around it of openness that people walk through before they arrive there. A bit like having a bouquet of flowers where the wrapping around them supports the flowers and helps amplify their beauty. In contrast, if we wrapped a bouquet of flowers in a cardboard tube on two sides that was twice the height of the flowers – they really wouldn't be the same and lose their vibrancy. This is just flowers that are gone within days. If we smother the park with high rise buildings – this will in effect be smothering the park permanently. This will damage the qifield – and it will really lose the amazing feel that it has – meaning a loss to people's wellbeing who visit it.

Our population will rise, and maybe climate change will mean our population will really increase more than we know. If we look now at densely populated urban areas, the places that are parks are real treasures for people, and so important for wellbeing. If we were to put ourselves 20 years or 200 years into the future – what would we prefer? I know I'd prefer to have a beautiful open Park, of which Bishops Way is in effect part of it, rather than one overshadowed by apartments. Our local population is going to be more dense. I believe that significant decisions like changing the qifield of this area and changing the qifield of the Park including the area adjacent to Bishops Way needs to be made with the very best long term planning in mind – with harmony and wellbeing for all as the core driving principle. It needs to be done with love and respect at the core.

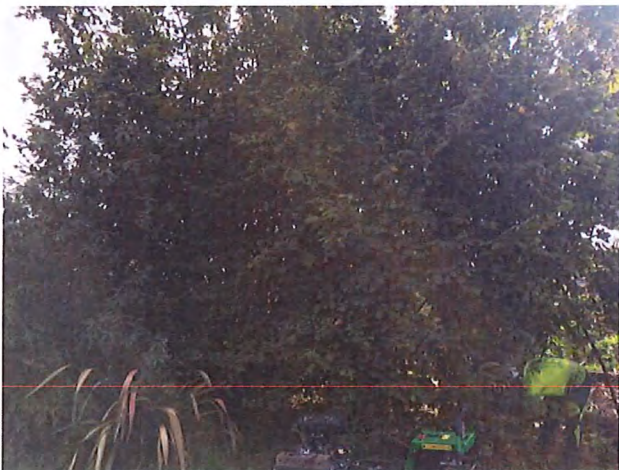
Let's be wise and preserve this park and the ongoing positive effect on the wellbeing of our community.



This picture of Isel Park is taken from the main grassy area. The mountains can be seen in the distance. The roof of the house, which is single storied if in front of the area that would become six story apartments. The view to the mountains will be lost, along side the sense of openness. As humans, when we have such beautiful views, we naturally enjoy them – it helps us to feel more open and relaxed inside – really improving our wellbeing. This is why we love places with beautiful expansive views. This would be lost.



Again in this image, the expansive view out to the mountains would be lost. With intensification comes density. For our wellbeing, we need a sense of space and expansion to balance that feeling. I'm sure that's something we can naturally relate to.



Dense hazelnut planting 22 Sadlier St which created a significant feeling of damp as they were so tall and blocked light and air flow. The qifield felt blocked and it wasn't pleasant sitting outside.



After the hazelnuts were removed, the space became light, expansive and open. The qifield improved and felt better as there was more light and airflow. It became really pleasant to sit outside again.

Natural hazards - Flood Zone:

This area is also a flood zone so not appropriate for intensification at a level of 6 stories.

Pollution:

The densification of six stories in a small area will likely cause more pollution to the adjacent stream.

Māori Tenth's:

This area could be relevant to the tenth's case.

Iwi:

This area may have significant to Iwi.

(B) Six storied apartments

Nelson is not required by government to have six storied apartments. This decision is out of balance for the region and will dramatically change the feel of the place. Again, this decision is out of balance for the region. Wise change needs to be made with harmony and balance in mind, to preserve the qifield – and create a qifield that is in balance with nature and is for the benefit of humans and all plants, creatures, waterways, all of nature that reside here. I believe there needs to be well considered planning made that addresses the overall effect of high rise, as well as the smaller, micro effects in each street and section. There will be wisdom around this from within humanity. Again I reiterate that I believe that significant decisions like this need to be made with the very best long term planning in mind – with harmony and wellbeing for all as the core driving principle. It needs to be done with love and respect at the core.

IF the zoning for six storied apartments went ahead in the Sadlier Street area, around Bishops Park, I would like to see Bishops Park specifically developed so it became an area for people to safely and harmoniously gather. eg: fencing to make it safe for young children, accessible play areas, food preparation areas eg BBQ, and any other visionary ideas that would make it a warm, safe, loving and harmonious place for people to leave their 6 storied apartments and come together for maintaining and improving wellbeing.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S524
Submitter Name	Paul Barter
Submitter first name	Paul
Submitter surname	Barter
Submitter is contact	Yes
Email	paulbarter.nz@gmail.com
Wish to be heard	No
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Support in part	See above	

Change 29, which proposes housing intensification in various zones throughout the city. While I appreciate the need for responsible urban and residential development, I believe that the current plan lacks consideration for crucial factors, such as preserving sunlight, maintaining privacy for existing residents, and promoting sustainable living.

Specifically, my concerns about Plan Change 29 are as follows:

1. **Sunlight and Shading:** The proposal for Medium- and High-Density Residential Zones, which allows for three and six-story buildings, raises serious concerns regarding the loss of sunlight to neighbouring properties. The term 'daylight' used in the plan should be reevaluated to ensure that it adequately considers shading effects on neighbouring properties. The proposed distances to bordering properties are far too small and should be increased to mitigate adverse effects.
2. **Limiting Intensification:** I strongly urge the Council to reconsider the areas designated for medium and high-density residential development. It would be more suitable to restrict these developments to the Central Business District (CBD) to preserve the character of existing residential neighbourhoods. If intensification is to occur in residential zones, it should be limited to a maximum of two stories to minimize the impact on existing properties.
3. **Parking Provisions:** The plan lacks provisions for additional parking in the medium and high-density residential areas. This oversight could lead to increased parking issues, congestion, and adversely affect the quality of life for existing residents. Adequate parking should be a critical aspect of the plan to ensure the accessibility and convenience of these areas. I fully support better walking, biking and public transport access to the inner city but do not believe that people will automatically adopt public transport or change their habits overnight and adequate parking provisions are necessary.
4. **Granny Flats and Sustainable Living:** To encourage intensification and provide more housing options, the Council should consider allowing the construction of "granny flats" on existing properties without the need for

resource consent. This approach not only supports sustainable living but also maintains the character of the neighbourhoods.

5. **Sunshine and Sustainability:** Nelson is renowned for its high annual sunshine hours. The proposed changes could preclude homeowners from installing solar panels and growing their own vegetables due to reduced sunlight. The Council should prioritize sustainability by protecting access to sunlight for existing and future residents.

In conclusion, I believe that a balanced approach to housing intensification is necessary to ensure that Nelson continues to be a desirable and sustainable place to live. The current Plan Change 29, as it stands, does not adequately address my concerns and is unlikely to meet the needs of the community.

I kindly request that the Council revisits the proposed plan and considers the recommendations presented in this submission. By doing so, we can work together to create a city that balances growth and liveability for all residents.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S525
Submitter Name	Jane Rogers
Submitter first name	Jane
Submitter surname	Rogers
Submitter is contact	Yes
Email	jane@tomo.co.nz
Wish to be heard	No
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General support	Support in part	I agree that there is no doubt that Nelson needs intensification to prevent continual urban sprawl into agricultural and horticultural land. I believe Plan 29 is proposing a one size fits all approach that permits building development that fits few criteria.	For a successful intensification policy Nelson city council must design comprehensive neighbourhood plans first. This includes upholding the character, nature and landscaping of the neighbourhood. These would outline the specific goals for each neighbourhood in a co-ordinated way.
Residential Zones	Other	Oppose in part	My biggest concern is in regards to how existing houses will be affected especially in regard to sunlight and shadow cast on them if they are in areas designated for 3 to 6 stories.	I believe rules need to be made to control the height of buildings in relation to prevent shadowing to existing low-rise buildings.

Residential Zones	Other	Oppose in part	I am concerned that there is to be no provision for carparks in these 3 to 6 story dwellings. I understand that they are to be built along bus routes which is great for intra-city travel. But unlike Europe where you can catch trains to different cities, the transport infrastructure in New Zealand is pretty woeful in comparison meaning most people need a car to travel out of their districts. It is hard to believe that people will want homes that have no provision for car parking.	I believe carparks should be incorporated within the building or properties.
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Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S526
Submitter Name	Michael MONAGHAN
Submitter first name	Michael
Submitter middle name	Gerald
Submitter surname	MONAGHAN
Submitter is contact	Yes
Email	mmonaghan@xtra.co.nz
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose		We reject Plan Change 29 and wish to be consulted on all aspects of this now and in the future. We understand that this is the biggest plan change proposal the council has ever undertaken. It is important that the approach to this proposed plan change is carefully managed. The Plan Change, once enacted, will have a dramatic effect on our city and one that we will not be able to retrench from. It is our hope that the concerns and alternative solutions outlined in this submission will be considered going forward.

Tier 2 Urban environments

The National Policy Statement on Urban Development 2020 identifies Nelson in the Tier 2 Table where buildings are provided at 12.5m high. High Density or 19.5m high buildings, are not identified. For this reason, 19.5m high buildings must be removed entirely from any documentation provided by Nelson City Council. It is not

provided for by Government policy and has not been mandated by the public of Nelson for our Nelson City Council to enact unilaterally.

Further to the National Policy Statement requirements, Nelson City is blessed with appealing hills and conservation areas that edge our city, with the unique sub-alpine mountains regions beyond. It is important that we

protect the views and connections that we have with the surrounding Grampians, Centre of New Zealand, Brook Valley area and special qualities of the Coppermine area. Without the protection of these connections and views, enabling birds to use corridors into our city, we lose the qualities that differentiate us from other cities across the world. The views to these hills and the sub- alpine areas are obtainable, presently, from the CBD areas

including Trafalgar, Bridge, Hardy, Rutherford Streets and the surrounding areas.

We need to begin to regain the qualities that make Nelson special. Amongst many other initiatives that are required, it is important that we retain the shape, important and iconic views to our hills, that visitors enjoy and our community value.

Request; that 19.5m buildings be removed from the Proposed Plan Change 29 document.

Propose: that 11.0m buildings be the maximum height of buildings, being measured from natural ground level, to be included in the Plan Change 29 document.

Yours faithfully,

Michael & Sita Monaghan

Documents included with submission

Document name M&S Monaghan Submission letter

File [msmonaghan231030submission.docx](#)

Description

Michael & Sita Monaghan

mmonaghan@xtra.co.nz

Nelson City Council
P.O. Box 645
Nelson 7040
NZ
Via; Shape Nelson submission.

29 October 2023

Dear Sir/Madam

Subject: Submission on Proposed Plan Change 29

We reject Plan Change 29 and wish to be consulted on all aspects of this now and in the future.

We understand that this is the biggest plan change proposal the council has ever undertaken. It is important that the approach to this proposed plan change is carefully managed. The Plan Change, once enacted, will have a dramatic effect on our city and one that we will not be able to retrench from. It is my hope that the concerns and alternative solutions outlined in this submission will be considered going forward.

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Request; that 19.5m buildings be removed from the Proposed Plan Change 29 document.

Propose: that 11.0m buildings be the maximum height of buildings, being measured from natural ground level, to be included in the Plan Change 29 document.

Yours faithfully,
Michael & Sita Monaghan

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S527
Submitter Name	Amy Ridout
Submitter first name	Amy
Submitter surname	Ridout
Submitter is contact	Yes
Email	amyridout@gmail.com
Wish to be heard	No
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General support	Support in part	I would like to see more intensification because it will contribute to a livelier city, with more people travelling on foot or by bicycle.	I agree we need more housing and we should not be building on greenfield/arable land. But I think each development should be planned on a case-by-case basis, looking at each street/neighbourhood. There should also be an overarching plan for design and quality, so the buildings are attractive and fit into their surroundings. We don't want big developers building as cheaply as possible.

Documents included with submission

None

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S528
Submitter Name	Greg Hornsby
Submitter first name	Greg
Submitter middle name	David
Submitter surname	Hornsby
Submitter is contact	Yes
Email	greghornsby@gmail.com
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General support	Support in part	Nelson would benefit from higher density in the central areas that would provide good quality but affordable accommodation. In order for the city to grow, become more vibrant and diverse but also to reduce car journeys and encourage walking/cycling around the city. Affordable housing is also very important as there are far too many struggling renters who are living in sub-standard accommodation.	Residential intensification in central Nelson but taking into account the immediate surroundings and ensuring a good standard quality of build. Managing parts of Nelson susceptible to natural disasters. Provide for tangata whenua to develop papakāinga housing.

Documents included with submission

None

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S529
Submitter Name	Teresa Keogan
Submitter first name	Teresa
Submitter surname	Keogan
Submitter is contact	Yes
Email	keogan@xtra.co.nz
Wish to be heard	No
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Natural Hazards/Climate Change	Slope Instability	Oppose	PC29 Slope instability Area 2 Overlay NCC have ignored information on their files that disprove slope instability in this area. The overlay bears no relationship to the geotechnical conditions that exist across this subdivision. The slope instability Area has not taken into account the review of existing geotechnical information and reporting held by Nelson City Council which is well documented on their files.	I would like Nelson City Council to review and amend the PC29 Slope instability Area 2 Overlay to take into account the geotechnical information which they currently hold.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S530
Submitter Name	Daniel Jackson
Submitter first name	Daniel
Submitter surname	Jackson
Submitter is contact	Yes
Email	danielneljack@gmail.com
Wish to be heard	Yes
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Heritage	Richmond Avenue	Oppose	Richmond Avenue has some nice old houses, but the heritage values in the street overall are not significantly higher than other surrounding areas. It is more character than heritage. The heritage values there are insufficient to justify a heritage precinct, particularly when it is a good location for intensification with its proximity to the city centre.	Delete the Richmond Avenue heritage precinct.
Residential Zones	Other	Amend	People should be able to build up to the boundary, at least if they comply with the recession planes. Having houses built close together or indeed with shared walls is very common in other countries. This is a great way to enable greater intensification and can reduce the need to build up if people are concerned with that.	Allow people to build up to the boundary.

Residential Zones	Other	Oppose in part	The limits on site coverage should be removed or at least the site coverage proportion substantially increased. The extent to which people want gardens or outdoor space varies considerably. Some people may prefer not to have a garden or outdoor area to maintain, but to do their outdoor recreation elsewhere in public parks and areas. Allowing greater site coverage substantially increases the housing that is possible on a section and may mitigate the need to build high where people are concerned about that.	Remove or substantially reduce the site coverage restrictions
Residential Zones	Other	Support	The proposal to allow three dwellings per title as of right is important. It will allow partitioning of properties and the building of flats. It enables intensification without building up where that is not wanted.	Maintain the ability to have three dwellings per title as of right.
Residential Zones	Other	Support in part	Six stories allows high density (although not the highest density of taller apartment buildings, which should be allowed in the CBD) in appropriate areas close to the city centre. Three stories should be allowed everywhere. It enables medium density housing, as has been successfully done in many suburbs in cities like Auckland and overseas. Allowing it, everywhere will enable us to solve our housing crisis and reduce sprawl, with its attendant costs in terms of carbon emissions, congestion and infrastructure.	Three stories should be allowed everywhere. More than six stories should be allowed in the CBD. Apart from this, the height limits and zones should be maintained as proposed.
Entire Plan Change	General Support	Support	Intensification is crucial for Nelson's future. Nelson will not attract and retain young people if it does not have enough housing or it is unaffordable. Greater density is essential for tackling climate change as well. Enabling people to live close to the city centre where they can access services and amenities without needing to drive is vital for reducing emissions. Nelson's geography limits its ability to grow. It must intensify or it will decline.	Adopt the Plan Change.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S531
Submitter Name	David Collier
Submitter first name	David
Submitter surname	Collier
Submitter is contact	Yes
Email	dave.collier@mtf.co.nz
Wish to be heard	No
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose		Please overturn the current plan and re look at it after you have listened to your community

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) Hearing Panel

a) I strongly disagree with the make-up of the hearing panel, because of its 'biased' public perception following the vote on Councilor Courtneys proposal to withdraw PC29 at the 14th September Council meeting.

i) I ask the Council to appoint Councilors from either side of the Sept 14th vote.

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 with care. 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 been a cherished holiday destination for many New Zealanders.

b) Residential Neighborhoods should be protected for future generations to enjoy and new developments thoughtfully designed and planned on a neighborhood, by neighborhood 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.

d) Contemporary Black Iron Clad Boxes, built only a few meter's from 120-year-old Historic Homes is a thoughtless lack of 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 some of our older neighborhoods. They help considerably with the wellbeing of the residents and help to provide an essential part of the attraction of Nelson, which must all be considered during developing the growth of Nelson.

i) I ask the Council to create a broader level of protection for neighborhood's beyond the heritage buildings and precincts that still have historic character value from the early settlement years of Nelson.

ii) I ask the Council to appoint an Urban Development Agency (UDA) to carefully guide growth and actively facilitate the emergence of cohesive urban neighborhoods 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. It is not called the 'Sunshine Capital of NZ' for no reason. It is well documented that people relocate to Nelson because of the Sun

and accept reduced wages called 'Sunshine Wages' for that privilege.

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) 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: -

i) Increased levels of mental health illness, anxiety and stress.

ii) Increased levels of damp homes with associated mould and mildew and respiratory illnesses.

iii) Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.

iv) Increased heating costs, air pollution, carbon foot print, are all exasperated due to a large portion of Nelson housing is old, with un-insulated walls and single glazing and open fires were legislated out of use many years ago.

v) Reduction in property values and increased financial stress, because the house would be less desirable to live in.

vi) Residents, struggling with the cost-of-living crisis may not afford to heat their home.

vii) 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-story 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 minimized, and to ensure there is sufficient space around buildings to allow the admission of daylight 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 neighbors 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 neighbors] have a reasonable degree of privacy as well as encourage 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 story dwellings as it is a complete underutilization of land that can accommodate increased intensification.

i) I ask Council to ensure a minimum of two story 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 neighbor's.

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 utilized 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) Incentivize 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 neighborhood.

8) Progressively Phased Intensification

a) Firstly, Inner City should be the starting place to have the most significant intensification, before forcing it onto the residential neighborhood's, this can give more time to complete a better design vision for our residential neighborhood's.

i) I ask Council to make better utilization 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 incentivize Industry and car yards to relocate, to less essential land that can be better used for accommodation.

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 story 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.

9) Intensification in hazard zones

a) I question councils plan to allow up to 6 story dwellings on Toswill road and Tamaki street, or general Tahuna hills area as not being appropriate for the area given that it has been assessed as vulnerable and 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 not be built on in this manner.

10) On-street carparking

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.

b) This will cause fracturing of neighbourly relations and communities, the Tahuna hills area is already narrow and dangerous with carpark pressure currently let alone increasing housing.

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 neighbors' 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.

13) I strongly oppose the Tahuna hills area being used for the following reasons

1. Slope instability

We were informed by the NCC planner that there was no consideration of geotechnical issues when deciding on the proposed zoning of the area. Our biggest concern is that high density development will increase the potential severity of future slips on the Tahunanui Hills. The proposed HDZ in the Tahunanui Hills is an area potentially affected by significant natural hazard of slope instability. Plan change 29 Housing and Hazards on the Nelson City Council website stated that intensification should not include areas potentially affected by significant natural hazards:

"Enabling the intensification of development on land currently zoned for residential and commercial uses (Residential Zone, Inner City Zone, and Suburban Commercial Zone), that is not within areas potentially affected by significant natural hazards"

There is an instability hazard overlay on 8 of the properties out of the 44 in the new proposed HDZ for Tahunanui Hills. This includes 4 Tamaki Street, 113 and 111 Tahunanui Drive, and 13, 15, 17, 23 and 19 Tosswill Rd. Beca's 2022 report on slope instability said that damage observed along these old sea wall slopes post-August 2022 indicate they pose an elevated risk due to over-steepened slope profile and weathering.

Furthermore, all of the properties covered by the proposed HDZ (including our house) have a condition (Condition 1) on their property title with the Council. Condition 1 is on the NCC NRMP register and states that the land may be of suspect stability and conditions must be in place including geotechnical reports for any developments. This has resulted in geotechnical reports being completed where property owners have undertaken development. Geotechnical reports have recognised the instability of the steep hill and required extensive foundations and work even for single story buildings. The proposed hazard overlays for slope stability do not include these Condition 1 properties but that does not mean there is no risk now especially with higher intensity of rainfall and intensification of the land. Beca produced a slope stability report in 2021 that stated regarding the Tahunanui Hills that (emphasis added):

"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"

Many properties in the proposed HDZ have already experienced slips, such as at Tosswill Road where slips have blocked Tosswill Road several times.

Dr M. R. Johnston Consulting Geologist (in a 2018 report) recommends that all developments in hill areas other than minor structures and earthworks involving cut and fill faces less than 1m in height and thickness and/or fill comprising no more than 3m³, on sloping ground be subject to geotechnical input so as to minimise the risk of slope instability:

"It is recommended that the Hill area is requiring geotechnical assessment or Geotechnical assessment requirements for hillsides...

One specific geotechnical condition is C418 that applies to the abandoned sea cliff that extends along the former waterfront from Annesbrook to Tahunanui. These cliffs are cut in relatively weak rock whose stability is decreasing as weathering progresses. The areas referred to in C418 could be, subject to a revision of its boundaries, incorporated into a slope risk overlay".

We have observed in dry weather large cracks on the dirt and grass around our house and we have had springs pop up then go away after a period of months.

During our time living on Tosswill road, we have experienced several high rainfall events where access to our home has been cut off after slips have occurred on both sides of Tosswill Road. We have observed weeping coming through new seal in Tosswill road from small springs after heavy rain, this road has been repaired many times with visible patches in the length of the road. Seismic activity combined with a storm event in a high-density area could be a disaster as mentioned in several reports on the Tahunanui slump.

There has been no geotechnical input into what intensification (of up to six-story's) will do to the stability of the Tahunanui Hills. Climate change will increase adverse weather events with even greater potential to create slips on the hill.

The Beca Report on slope stability zones (dated 9/12/2021) recommended future work for land earmarked for future development as follows (underlines added):

1. The physical extent of the slope instability overlay may additionally be expanded to include areas of interest outside those included in this study, such as land earmarked for future development.
2. The overlay set out in the Beca report has been prepared from desk study only. refinement of the instability and run-out zones may be completed from field mapping. This step may be applicable for developed areas on land particularly prone to landslides and/or land earmarked for future development.
3. Report does not identify full extent of areas impacted by slope instability across hillslopes.
4. Risk assessments require additional considerations, including likelihood of slope failure and the potential consequences to a particular element at risk. Neither of these are considered in our susceptibility overlay given its primary purpose is to inform the need for further geotechnical assessment.
5. Does not show deep seated failures (i.e. Tāhunanui Slump), nor areas of hill creep. The maximum downslope extent of solid debris difficult to determine.
6. Tāhunanui - An extensive scarp formed along the head scarp of the Tāhunanui slump core below Princes Drive. Deep seated movement impacting multiple residential properties was recorded in this area. Shallow slope failures were additionally observed along the abandoned sea cliff along Tāhunanui Drive and near Port Nelson

2. Amenities

The NCC planning team stated that the Tāhunanui Hills were chosen for the proposed high-density development because of their closeness to amenities. The amenities referred to (being the school and shops) are down a steep set of stairs and across State Highway 1, not easily accessible for young families, the elderly, or the mobility impaired without a vehicle. There are no supermarkets within walking distance of the proposed HDZ in Tāhunanui which would be a serious issue for all the HDZ residents with no vehicles.

3. Traffic

The Tāhunanui Hills is serviced by narrow, winding streets which in our opinion are inappropriate to service high traffic volumes

NCC recently installed speed bumps along Tosswill Road to slow down traffic which uses this road as a thoroughfare to and from Nelson City. The road is very narrow and from my time living here, we have seen several incidents and near misses due to the narrow winding nature of the road where cars often cross the centre line. In addition, accessing Tāhunanui Drive from Tosswill Road can be very difficult and dangerous and would need significant upgrading before this scale of development could be accommodated on the hill. We consider that the potential traffic produced by high-density development in this area has not been considered in enough detail as to whether it is appropriate. The same is likely for other infrastructure provisions to the area, such as Three Waters servicing. There are several reoccurring slip zones onto Tosswill Rd that make it even more dangerous.

4. Sunlight and Shading Effects

Sunlight is an essential part of living in Nelson and why we chose to live on the Tāhunanui Hills.

Our house has been built for the sun and for the garden to receive sun. It will be subjected to the loss of sunlight by neighboring intensification with the following possible effects:

- Three sides of our property could have 6 story high apartments one metre from the boundary and 1 side 3 story completely enclosed our property in a very high box of buildings. This could compromise our health and mental state.
- Hill properties like ours already have additional shading issues directly from the hill which is another reason for not having high density development on hills.
- The lack of sunlight could result in existing homes becoming dark and damp with associated mold and mildew.
- Our house could lose property value if it is surrounded by apartments.
- Privacy and outlook are a critical part of enjoying a property.

5. Trees and Gardens in the Tāhunanui Hills HDZ

There are many established large trees (over 6

meter's high) in this Tāhunanui Hill HDZ that are helping stabilize the ground and providing a habitat for our native birds. These will be lost when there is no sun to support their growth or removed to make way for intensive development.

We have counted the large trees in the Tāhunanui Hill high density zone and there are approximately 1200 trees over 6 meter's in height. They form part of the green garden canopy. There are direct benefits for maintaining and increasing leaf area index, or green spaces, in our suburb particularly with climate change increasing temperatures and heat extremes. Access to green spaces leads to an improvement in mental and physical wellbeing. Trees help with air pollution. They also play a vital role in storing and filtering water which helps prevent slips on the hill.

Trees provide a habit for our native birds, thus improving biodiversity in our urban setting. The Tāhunanui community has actively been killing rats and we now have established communities of Weka, Tui, Kereru and Piwakawaka. We see these birds every day on our property. Their habit could be destroyed with high density development. Most Tāhunanui Hill residents have productive gardens with fruit and nut trees and vegetables which will no longer be viable with the shading.

6. Recreation

Tamaki Street is one of the steepest streets in New Zealand and it has over 400 steps at the top to Princess Drive. Many walkers, runners, tourists and locals walk daily from the bottom of Tamaki Street up the hill for fitness, well-being and to enjoy the peaceful beautiful view down the hill to the sea. We estimate around 100 walkers a day walk up and down Tamaki Street. They enjoy the established gardens and birdlife. This city walking trail could become more shaded and dangerous with increased shading, reduced amenity, and traffic from the intensification.

7. Intensification

It will be expensive for developers to fulfil the requirements to build 6 story buildings on the

hill. The resulting apartments therefore would be fewer in number and expensive to buy. The Tāhunanui HDZ could easily become developments of expensive holiday apartments that sit empty for long periods. This does not solve our intensification, growth, and affordability dilemma, and yet it locks up our valuable housing resource.

We are opposed to new 'green field' developments being used for only single story dwellings as it is a complete underutilization of land that can accommodate increased intensification without affecting existing suburbs. The inner city should be the starting place for the most significant intensification before moving onto green field developments then finally when all options are exhausted move to existing residential neighborhoods.

In summary I believe that the CBD, Greenfield developments, the Haven road area or any area like that backing onto a hill that doesn't impact other property owners make perfect sense to being used for higher density housing but allowing this in existing built up areas show a distinct lack of planning and thought and will create a Nelson that has no character and is a mixed mess of housing types, we should be looking to create a Nelson that has a vibrant city centre with well planned green spaces, a beautiful waterfront, appropriate housing that fits with the character of the city.

Thankyou for taking the time to read my submission.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S532
Submitter Name	Kerry Haycock
Submitter first name	Kerry
Submitter middle name	Langley
Submitter surname	Haycock
Submitter is contact	Yes
Email	kerry.l.haycock@gmail.com
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Residential Zones	High Density Residential Zone	Oppose	• Impact the historic nature of many neighbourhoods surrounding the CBD • Construction currently accounts for 30% of the world's carbon footprint. With our abundant forestry resources, Nelson should be leading in the development of net carbon-zero buildings. • It will lead to increased traffic congestion and air pollution. • It will put pressure on infrastructure, such as utilities, schools, hospitals, and public transport. • It will harm the environment by increasing the risk of loss of native bush, landscape trees, increased runoff from more hard surfaces adding to flooding and erosion risks. • Loss of light to neighbouring properties impact the ability to utilise solar PV, garden crops and enjoyment of the sunny Nelson climate • It will displace existing residents and businesses.	Restrict any high-density living (i.e. dwellings 3 stories or higher) to the Mixed Use and Centre City zones already set out in the draft Whakamahere Whakatū Nelson Plan and leave the areas currently marked "high density" under PC 29 as they currently are.

Documents included with submission

Document name	KL Haycock S532 NCC Plan Change 29 submission
File	klhaycocknccplanchange29submission.pdf
Description	S532 KL HAYCOCK PC29 SUBMISSION

To: Nelson City Council

From: Kerry HAYCOCK

Date: 26 October 2023

Subject: Objection to Plan Change 29

I am writing to object to Nelson City Council's Plan Change 29, which proposes to make changes to the Nelson Resource Management Plan to allow for more intensive development in the urban area.

I have the following concerns about Plan Change 29:

- Impact the historic nature of many neighbourhoods surrounding the CBD
- Construction currently accounts for 30% of the world's carbon footprint. With our abundant forestry resources, Nelson should be leading in the development of net carbon-zero buildings. Plan Change 29 will add to our carbon footprint.
- It will lead to increased traffic congestion and air pollution.
- It will put pressure on infrastructure, such as utilities, schools, hospitals, and public transport.
- It will harm the environment by increasing the risk of loss of native bush, landscape trees, increased runoff from more hard surfaces adding to flooding and erosion risks.
- Loss of light to neighbouring properties impact the ability to utilise solar PV, garden crops and enjoyment of the sunny Nelson climate in our backyards.
- It will displace existing residents and businesses.

I believe that Plan Change 29 is not in the best interests of the Nelson community. I urge you to reconsider this proposal and to develop a plan that is more sustainable and equitable.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to be 'Kerry Haycock', written in a cursive style.

Kerry Haycock

- **Poor communication over recent time including, inconsistencies, confusion, short time frame and lack of notice in the consultation process**

The changes proposed under PC29 are significant and will have a dramatic impact on Nelson residents and the nature of our neighbourhoods. I do not believe there has been enough publicity around these changes to ensure people are fully informed. The proposed changes may have a significant long-term effect on my neighbourhood and potentially on me financially if the value of my property is affected. I regularly receive detailed about short-term effects on my property, such as road closures for utility repairs. I have received nothing targeted to indicate there is potentially a big change to my property zoning.

The documents available online are not easy to follow and the consultation time was initially short given the impact of the changes. Fortunately, this was extended but only after a public outcry.

In addition, there are inconsistencies between what has previously been proposed for the future growth and development of Nelson and what is being proposed in PC29. For example, I now understand the draft Nelson Plan envisages only medium-density zoning through the area now zoned "high density" in PC29, with a building height of up to 11m, whereas in the medium-density zones in PC29, the proposed building height is now up to 12m. These inconsistencies create confusion and misunderstanding of what is now being proposed.

When there was general publicity about the draft Nelson Plan and the Future Development Strategy for Nelson, I did not understand that the intensification of "Nelson City Centre" would apply to me; I live in a low-rise, green residential neighbourhood and the maps did not show 6 stories in my neighbourhood. By using general terms like "city centre", and by mixing up the terms and the areas to which intensification applies, the Council has made it very difficult for anyone but professionals used to dealing with city planning/the Resource Management Act to follow what is going on. I only know because someone else affected by plan changes raised the issues publically.

- **Climate Change and sustainability**

Urban planning needs to start to consider the method of building. Construction currently accounts for 30% of the world's carbon footprint. With our abundant forestry resources, Nelson should be leading in the development of net carbon-zero buildings. The encouragement of 3-6 storey buildings will only add to the carbon footprint of the city without some encouragement/restriction of the method of building meeting net carbon-zero guidelines. Let's be a leader in this field – we are currently well behind Europe.

6-story apartments looming over single-story family homes would cast shadows over these properties, block natural light, be a significant invasion of privacy and impact their sustainable living desires such as solar power.

- **Impact on amenity values**

I appreciate that Nelson's population is growing and we need to be able to increase the density of housing in our inner city. I would be supportive of 4 story high-rise developments in the middle of town (perhaps to the edge of Nile Street, bordering the city), where we already have a multitude of medium-rise and commercial buildings. However, I do not believe we should allow developers to build these 3-6-story high-rise developments through our existing family neighbourhoods, especially without resource consent. The density of housing can be increased in these areas without the need for such tall high-rise developments. There is an opportunity to enhance these neighbourhoods with, for example, 2-story apartments and subdivided sections for low-level builds. This would enable progress in housing development without sacrificing the current appeal of the neighbourhoods and in a way that would be more considerate and reasonable to the existing residents. It would also be more consistent with the 3-story proposals in the Draft Nelson Plan.

The neighbourhood blocks from Nile Street up to Nelson College and between Rutherford Street and Collingwood Streets predominantly consist of older, well-established single-family homes and low-rise 1-2-story structures. These residential zones have long fostered a close-knit community where neighbours know each other and families thrive. We have supported each other through the pandemic and recent climate change driven emergencies - we know our neighbours.

Residents such as myself have chosen to live here for the smaller, regional town benefits and advantages that it provides, which include being able to raise children in family homes surrounded by greenery and open spaces, and not in high-rise buildings amongst the usual urban business you would find in our bigger cities. Introducing high rises that would tower over these family homes would erase the unique atmosphere of this area and could negatively impact the quality of life for existing residents. It would interrupt the aesthetic harmony of our neighbourhood and disrupt the skyline.

It appears certain the Plan change increase in the capacity will far exceed the growth that is likely in the next 30 years. There are unlikely to be very many high-density developments given the constraints. So to me, this means that for the unlucky few, it could result in a very uneven-looking neighbourhood, with apartments facing into neighbouring yards for some distance around, while the remainder are unaffected. It results in a lottery effect on amenity.

The changes are particularly significant for neighbourhoods like mine that are currently zoned "residential - lower density". The change from lower density to such high density will be a very significant change in how my neighbourhood looks and how I interact with my neighbours.

These types of high-rise developments may also be more likely to attract absentee owners and a proliferation of Air BnB type accommodation which will also negatively impact the existing residents.

- **Congestion and parking issues**

High-rise developments tend to exacerbate traffic congestion and parking problems. Our street and surrounds are already packed with day parking. I understand the current proposed plan does not include mandatory vehicle access to each site. While many residents in the proposed high-density areas will (hopefully) be limiting the use of their cars (by cycling and walking or taking public transport) the nature of our city means for most people at least one car is still required (for example to do the supermarket shopping, to take children to sport, for work, or to access the many wonderful outdoor areas that surround Nelson). Our public transport system is not sufficient to cover everyone's transport needs. With limited (if any) parking spaces provided within these new developments this inevitably means that the surrounding streets will become congested, causing inconvenience for both existing residents and newcomers. The added traffic could also cause safety issues for pedestrians, cyclists and children.

- **The chilling effect – impact on property values and existing residents**

The introduction of up to 6-story apartments through the neighbourhoods mentioned above could significantly impact property values in the vicinity. It seems that the analysis accepts there will be an effect on some residents in this way, but that is just unlucky for them and they should just accept that for a proposed "greater good". Most families in these neighbourhoods choose to live here for the current character and appeal of the neighbourhood, and they make their property investments with these factors in mind. Rezoning these areas to 'high-density' could lead to uncertainty and decreased property values as potential buyers are put off by the impacts of surrounding high-rise buildings and the prospects of increasing high-density living.

These properties were never built contemplating a high-rise building next door and there would be no measures that an existing homeowner could take to minimise these impacts on their property and lifestyle. Subjecting (an unlucky few) existing residents to these issues would be extremely unfair and unreasonable.

- **Strain on infrastructure**

I realise that the Council might have done some analysis about infrastructure, but I am worried that rezoning the proposed high-density areas would exert immense pressure on the existing aging infrastructure. Our roads, utilities and public services haven't been designed to cope with anything more than 1-2 story developments. Many of the utilities in this area are old and struggle to accommodate the current population density. Significant increases in residents in these areas would overstretch these resources and negatively impact residents' quality of life. The blocks of houses in and around the bottom of the Grampians in particular already face increased risk of flooding and water damage from heavy rain, with the current drainage system often struggling to cope.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S533
Submitter Name	Deborah Allais
Submitter first name	Deborah
Submitter surname	Allais
Submitter is contact	Yes
Email	dallais@xtra.co.nz
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Residential Zones	High Density Residential Zone	Oppose	1. Lack of notice, inconsistency of information and short time frame: The short time frame between information being made public and accessible (voluminous document which is only available on line) and lack of notice given for the proposed plan. 2. Main inconsistency from what has been proposed for the future growth of nelson and what is being proposed in PC 29. 3. Lack of foresight into the planning of Nelson as a city and future climate changes: What urban planning and housing concepts are needed to meet the challenges of climate change and the changing society of work, leisure, family and old age? How can water, vegetation and passive solar power be combined in this design? What are the accompanying infrastructures? How should pedestrian and vehicle traffic, public and private, services and deliveries, household waste management in private lots and street collection be organised in this densely populated city? How can new social life spots (café shop, small shops or service points) be integrated into these denser residential areas? What policy to encourage a social diversity in dense areas?	1. "Restrict any high density living (ie dwellings 3 stories or higher) to the Mixed Use and Centre City zones already set out in the draft Whakamahere Whakatū Nelson Plan and leave the areas currently marked "high density" under PC 29 as they currently are.
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Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S534
Submitter Name	Lynette Nicholas
Submitter first name	Lynette
Submitter surname	Nicholas
Submitter is contact	Yes
Email	sunnynelson7010@gmail.com
Wish to be heard	No
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Support in part	See decision sought.	

I am writing to express my strong opposition to Plan Change 29, which proposes housing intensification in various zones throughout the city. While I appreciate the need for responsible urban and residential development, I believe that the current plan lacks consideration for crucial factors, such as preserving sunlight, maintaining privacy for existing residents, and promoting sustainable living.

Specifically, my concerns about Plan Change 29 are as follows and because I own two properties in the planned areas:

1. **Sunlight and Shading:** The proposal for Medium- and High-Density Residential Zones, which allows for three and six-story buildings, raises serious concerns regarding the loss of sunlight to neighbouring properties. The term 'daylight' used in the plan should be reevaluated to ensure that it adequately considers shading effects on neighbouring properties. The proposed distances to bordering properties are far too small and should be increased to mitigate adverse effects.
2. **Limiting Intensification:** I strongly urge the Council to reconsider the areas designated for medium and high-density residential development. It would be more suitable to restrict these developments to the Central Business District (CBD) to preserve the character of existing residential neighbourhoods. If intensification is to occur in residential zones, it should be limited to a maximum of two stories to minimize the impact on existing properties.
3. **Parking Provisions:** The plan lacks provisions for additional parking in the medium and high-density residential areas. This oversight could lead to unsafe streets, increased parking issues, congestion, and adversely affect the quality of life for existing residents. Adequate parking should be a critical aspect of the plan to ensure the accessibility and convenience of these areas and safety for us in small narrow streets. I fully support better walking, biking and public transport access to the inner city but do not believe that people will automatically adopt public transport or change their habits overnight and adequate parking provisions are necessary with any increased intensification.
4. **Granny Flats and Sustainable Living:** To encourage intensification and provide more

housing options, the Council should consider allowing the construction of "granny flats" on existing properties without the need for resource consent. This approach not only supports sustainable living but also maintains the character of the neighbourhoods.

5. **Sunshine and Sustainability:** Nelson is renowned for its high annual sunshine hours. The proposed changes could preclude homeowners from installing solar panels and growing their own vegetables due to reduced sunlight. The Council should prioritize sustainability by protecting access to sunlight for existing and future residents.

In conclusion, I believe that a balanced approach to housing intensification is necessary to ensure that Nelson continues to be a desirable, safe, and sustainable place to live. The current Plan Change 29, as it stands, does not adequately address my concerns and is unlikely to meet the needs of the community.

I kindly request that the Council revisits the proposed plan and considers the recommendations presented in this submission. By doing so, we can work together to create a city that balances growth and liveability for all residents.

Thank you for your attention to this matter.

Rev 0.1

Rec: 31/10/23
Sub No: 8535
NDocs: 539520224-

MUST be sent or delivered by 31/10/23 4pm to:

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

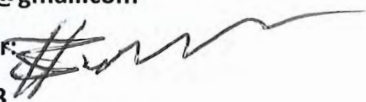
Submitter (Complete details below):

Full Name: Hamish Barker

Address: :

Telephone:

Email: hamish.barker@gmail.com

Signature of Submitter: 

Date: 30 October 2023

Delete as applicable: -

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) I object to the plan Change 29 Process for the following reasons

- a) The PC 29 lack of early public engagement and consultation by Council, in going to immediately notifying the plan, with nearly the minimum submission time (only extended after massive public pressure), and thus requiring the quasi-legal formulation of submissions, to be extremely stressful, it makes me so angry, and fearful of the possible negative impacts both on my family and on my most valuable possession, my home that I feel ill. Government should not be making people ill, it should be making them feel better, if anything!
- b) I am very upset 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, and fear that even if good submissions do get made, they will be brushed over as being "only a few people objected" while the reality may be that many submissions may not even be made by people who don't like the plan change 29, but are simply too busy trying to make a living, working a job or jobs, bringing up a family, to spend time and mental energy trying to make sense of technical planning documents and complicated submission processes.
- c) 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.

- d) The poorly prepared plan change 29 is so out of step with the expectations of ratepaying Nelson residents that it is going to result in thousands of opposing submissions. Reading, processing, attempting to rebut or otherwise deal with these submissions will entail a massive workload for council staff, which will cost a lot of money, which has itself been paid as ratepayers rates! If the council had actually gone through a proper consultative process and obtained better input from residents, much of this wasteful effort both by submitters and council staff, could have been saved.

What I want council to do in regard to the process:

- **I am asking Council to withdraw PC 29 and get Council Planning staff to take into account the already received submissions to refine the plan design to a form that is more likely to be acceptable to a larger number of people, and then put it back out for public submissions.**

2) Hearing Panel

I strongly disagree with the make-up of the hearing panel for the following reasons:

- a) Councillor Dennis Rohan O'Neill-Stevens has made statements and voted twice in favour of the plan (the second time after already knowing there is massive public opposition). He should at an absolute minimum have recused himself from the vote on Councillor Courtney's proposal to withdraw PC29 at the 14th September council meeting.
- b) Councillor Trudie Brand has also voted against Councillor Courtney's proposal at the 14th September meeting. Again, she should have recused herself from the vote.
- c) If both the conflicted councillors had recused themselves as they should have, councillor Courtney's proposal to withdraw PC29 may have been carried as the vote would have been 5:5 rather than 7:5.

What I want council to do in regard to the hearing panel:

- **remove one of the two councillors who have already voted twice in favour of PC29 and replace them with one of the councillors who voted in favour of Councillor Courtney's proposal to withdraw PC29 at the 14th Sept council meeting.**

3) Design Lead and Not Developer Lead Growth.

- a) According to Planner Coralie Barker, the daylight angles provisions and other planning controls were removed in order to allow the tall development intensification. To simply toss out planning controls which have worked to provide Nelson with its wonderful character, simply so that big boxes can be built to suit developers, is plainly wrong and unfair for those who have made the biggest investment they will likely make in their lives, putting their investment at risk of being massively overshadowed.
- b) Nelson south where we live is a residential Neighbourhood with long-established homes sought after for the sun, space and proximity. It's a valuable part of town, but if it is made into a hodgepodge of big tower blocks with big shade zones, that value will be destroyed. Some families buy there because they need to be close to the hospital and the schools - many doctors, who have no choice due to on-call response time requirements. They don't have the choice to go and live on a block in a low density zone.

- c) Green Spaces, Trees and Landscaping are essential for the look and feel of some of our older neighbourhoods. They help considerably with the wellbeing of the residents and help to provide an essential part of the attraction of Nelson, which must all be considered during developing the growth of Nelson.

What I want council to do in regard to this point:

- i) 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.
- ii) 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.

4) Sunlight Recession Planes and Shading Effects

- a) Sunlight is a **CRITICAL** part of living in Nelson. It is not called the 'Sunshine Capital of NZ' for no reason. It is well documented that people relocate to Nelson because of the Sun and accept reduced wages called 'Sunshine Wages' for that privilege. Furthermore, it is the winter sunshine that is most valuable. Any place can be nice in the summer, but a place that is nice and sunny in the winter is harder to find. The nearly complete gutting of the existing daylight angle provisions endangers winter sunlight access. For example:
 - in midwinter, the sun in Nelson does not rise higher than about 26 degrees, hence the southerly aspect recession planes were previously set at 25 degrees from 2.5m above ground AT THE BOUNDARY. The shadow which a building would cast is therefore defined by the whole recession plane, rather than just the top edge, and the shadow cast in mid winter midday would reach about 5.5m directly to the south of the boundary. Given typical section widths of circa 15m, the existing (not plan change 29) recession planes are acceptable. However, the plan change 29 proposed high density zone includes recession planes of 60 degrees from 12m at the boundary, rising to a maximum of 19m. thus the shadow cast would actually be cast from the top of the recession plane at 19m above ground 3.46m in from the boundary, casting a shadow in midwinter midday which would extend 37.3m south of the property boundary. This would mean that not only the whole section directly south of a maximum height building but also the whole section beyond that, could have shadow on the ground even at midday.
 - The modelling which I have received from planner Coralie Barker shows all of the buildings built with the long axis north-south, minimising the size of the shadow. but the plan change 29 does not actually mandate this. In fact, a builder of tall block would build with their own maximum ground level clear area on the north side, and locate the block as close as possible to the southern boundary to maximise their own sunlight reception but would also maximise the detrimental shadow on southerly neighbors.

- To allow such tall buildings to completely overshadow even the neighboring section is completely unfair. In every other aspect of building, the building code requires that OTHER PROPERTY not be adversely affected.
- For examples
 - **seismic movement must be taken into account :**
 - a building is not permitted to sway over the boundary as it could impact on other property.
- **external spread of fire:**
- per NZBC clause C3.6 "Buildings must be designed and constructed so that in the event of fire in the building the received radiation at the relevant boundary of the property does not exceed 30 kW/m2 and at a distance of 1 m beyond the relevant boundary of the property does not exceed 16 kW/m2."
- **noise:**
- admittedly, nelson's regulations are rather poorly defined, and only state that noise cannot be "unreasonable", whereas other jurisdictions provide a **measurable, objective noise level in dB** which must not be exceeded at the boundary.
- **stormwater:**
- uncontrolled discharge of stormwater from a building over the boundary is not permitted.

There are other examples, but clearly, protection of the amenity of neighboring properties, including the expectation that the daylight angle provisions which have long been in place.

No mandate has been sought to remove the existing daylight angles. There was **NO mentioning them at all** during the last council elections. We bought our property based on the location and if a maximum size high density area building under plan 29 was built to our north, we would have no sun in winter.

- 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) 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: -
 - i) Increased levels of mental health illness, anxiety and stress.
 - ii) Increased levels of damp homes with associated mould and mildew and respiratory illnesses.
 - iii) Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.
 - iv) Reduction in property values and increased financial stress, because the house would be less desirable to live in.
 - v) 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.

What I want council to do regarding daylight admission:

- (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 daylight 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.

5) 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 encourage residential units to be orientated towards the street or public open space'.

6) 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.

7) Progressively Phased Intensification

- a) Firstly, Inner City should be the starting place to have the most significant intensification, before forcing it onto the residential neighbourhoods, this can give more time to complete a better design vision for our residential neighbourhoods.
- i) There are currently over 11,000 square meters of land used in central Nelson city area for car sales. This is a total waste of valuable land which could provide upwards of 300 2-bedroom apartment units, based on 3 storey, 50% site coverage.

What I want council to do:

- **zone car sales as only permitted in industrial zoned property and impose zoning controls and sufficiently high punitive rates increase on land used for car sales in the city area which is not industrial zone, to encourage its redevelopment for residential use.**
- 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'.

8) On-street carparking

- 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.

9) 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.

10) 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.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S536
Submitter Name	Leah Collier
Submitter first name	Leah
Submitter surname	Collier
Submitter is contact	Yes
Email	leah.collier18@hotmail.com
Wish to be heard	No
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose	I do not support this plan at all! It is horrible the council think the people of Nelson would like a 6 storey building next to their homes. I would hate to live in my home and then all of a sudden next to me an apartment block goes in. It will ruin so many peoples views and land. My parents live in one of the zones and would be devastated if apartments ended up all around them. if you really think we need more housing start building out further where there is no builds currently.Don't ruin people's homes. Or if the council is that desperate, build up the city centre. All the retail shops could be 6 stories high, sure. But don't ruin people's homes. So many homes will lose the sun. Who wants to live on a dark property. Listen to your people Nelson city council. We pay enough rates as it is and you can be damn sure I won't be paying my rates if an apartment went up next door.	ABSOLUTELY OPPOSE!!!!!!!!!!!!!!!!!!!! !!!!!!!

Entire Plan Change	General opposition	Oppose	I do not believe all parts of Plan29 are the correct decisions to make. I oppose most of the plan but not all. 1) The Plan Change 29 process: A. 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. I have found PC 29 lacked early public engagement and consultation by Council. The process has caused severe stress and anxiety for lots of the existing rate paying residents who love their homes and don't want to be built out. A lot of people I have spoken to are completely unaware their property could be affected or just haven't heard anything about PC29 in general. C. I am in a position of hope that more qualified citizens than I, will make more comprehensive submissions covering my concerns as to the future of Nelson and its ratepaying residents. D. 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. E. Had I of known if the Maitai was to have gone ahead then we may not be in position we are in now, I most definitely would have put a submission in then. Just like I'm sure currently there are a lot of people not realising this will affect them. I understand it is a process, however the general person would not have realised this would be the outcome of not making a submission for the Maitai development to go ahead. 2) Hearing panel: A. I don't completely disagree with the hearing panel however I am nervous it is in favour of PC29 going ahead. I just hope the panel can look at the submissions without bias.	Remove the plan change other than the city centre
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3) Design lead and not developer/social housing lead growth:

A. Nelson is a very special and unique place that needs to be protected with care. We have some incredible historical areas which many people love about Nelson and rightfully so. However our 'Low Rise' City centre could definitely be improved. I believe the inner city centre could definitely be high density. I would not mind it having thoughtfully designed housing atop of retail/hospitality on the bottom level or two. I see nothing wrong with this. Yes, it may not look as nice as the current layout but if it can stop some residential areas being intensified I am all for it. Nelson city centre does not have much of a vibe, our bars, (most) restaurants and nightlife are mediocre and I do think having the city centre built up could highly improve Nelson in this area.

B. Residential neighbourhoods should be protected for future generations to enjoy and new developments thoughtfully designed and planned on a new neighbourhood, by neighbourhood basis to maintain the essence of their character. If everything looked the same all throughout areas it can look very boring and ugly.

4) Tahunanui hills area:

A. I believe the Tahunu hill area set out for medium-high density is absolutely absurd. Tosswill, Tamaki, Chamberlain etc is in absolutely no way an area that should have even been considered for development. There are springs all across the hill, they have a hard time with waterlogged properties even in minimal rain. The bottom half of my parents property hardly ever gets waked on in winter as it is too boggy and wet. I have heard many stories from neighbours and seen it first hand how difficult is in that area when it rains heavy. We had slips in many places especially at the bottom of the steps. Tosswill road had rocks scattered all across the road in the last big rain (and often just in general, its not overly stable) and a big slip right at the main round about.

B. Most people move to the hillside for the incredible views. I grew up on that hill and I know damn well I would not want to live there

if there was a 6 story building directly in front. Considering my parents property is in a medium density and directly in front and beside is high not only means they would lose their entire view in all directions but the value of their house would decrease dramatically as who in their right mind would pay to live on the hill and look at concrete walls. People on that hillside have worked incredibly hard to be able to afford houses in that area and I do not believe it is okay to take that away from them by putting 3-6 story buildings in amongst it all.

C. There is no bus access and the fact these buildings do not require cars means you will have hundreds of people walking up one of the steepest streets in Nelson (Tamaki) or up Tosswill. I sure know I wouldn't want to be doing that with my groceries (that I've had to walk to the junction for). Even if the bus was put back in place there, the new big buses would have a hell of a time around all the blind corners and windy parts. Its narrow enough as it is without a giant bus coming right over the centre lane on every corner.

D. The only two crossings on Tahunanui Drive are at the school and at the lights. That is very limited safe crossings. In my 17 years of living on Tosswill Road I've seen way too many near misses at the School crossing. It is not safe.

E. All the talk about it being close to a town hub is a huge stretch. If you consider what is there now a town hub then that's absurd. Yes there is a few things there for sure but I know most will go to Town, Stoke or Richmond for mainly everything. On the other hand, if it is intensified, will the small amount of things there actually be able to handle all the extra people. Will the school open its doors to hundreds of new kids, the doctors the same?

F. My last point for the Tahuna hills which I believe goes for all residential areas potentially being intensified and also one of the most important; The mental health and wellbeing of the residents. I truly believe taking away peoples sunlight hours will greatly damage mental health not to mention turn neighbours on neighbours. People move to the hills to get all day sun and beautiful views and taking that away from people who have worked so hard to get there is truly unfair.

Veggie gardens certainly wont thrive in darkness and neither will the residents.

5) Sunlight Recession Planes and Shading Effects:

A. Sunlight is a CRITICAL part of living in Nelson. It is not called the 'Sunshine Capital of NZ' for no reason. It is well documented that people relocate to Nelson because of the Sun and accept reduced wages called 'Sunshine Wages' for that privilege.

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. 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: -

- i) Increased levels of mental health illness, anxiety and stress.
- ii) Increased levels of damp homes with associated mould and mildew and respiratory illnesses.
- iii) Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.
- iv) Increased heating costs, air pollution, carbon foot print, are all exasperated due to a large portion of Nelson housing is old, with un-insulated walls and single glazing and open fires were legislated out of use many years ago.
- v) Reduction in property values and increased financial stress, because the house would be less desirable to live in.
- vi) Residents, struggling with the cost-of-living crisis may not afford to heat their home.
- vii) 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 daylight 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 encourage residential units to be orientated towards the street or public open space'.

7) Intensification:

A. I strongly oppose the High-Density Residential Zones anywhere other than the city centre.

B. I strongly oppose the High and Medium density for the Tuhuanui hills, Tosswill, Tamkai etc

C. 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. (If the likes of Berryfields was built into 6 story

buildings at the start, across the whole development I would not have minded one bit, at least then it would have been in one area and before buying you'd have known what you were getting yourself into)

D. 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.

E. 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.

F. Bigger older properties, could be better utilised and help with our growth if they were more easily allowed to be divided into multi-dwellings.

G. 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.

H. As above, younger people studying at NMIT or working in town would also be less likely to have cars/use buses and I believe the inner city is a perfect fit for this type of resident.

I. 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. I've always loved rooftop bars in other cities and Nelson could greatly use something like this.

J. 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 and are not greatly damaging neighbours sunlight.

K. Contemporary Black Iron Clad Boxes, built only a few metres from 120-year-old Historic Homes is a thoughtless lack of long-term vision for maintaining the attraction of Nelson for all the future residents and visitors.

L. The area next to Countdown where the Whareama rest home is I believe is a good site to intensify. It is only blocking the supermarkets sun and like council wants, it is close to a town hub.

M. Green Spaces, Trees and Landscaping are essential for the look and feel of some of our older neighbourhoods. They help considerably with the wellbeing of the residents and help to provide an essential part of the attraction of Nelson, which must all be considered during developing the growth of Nelson.

i) I ask the Council to create a broader level of protection for neighbourhoods that still have historic character value from the early settlement years of Nelson.

ii) 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.

8) Progressively Phased Intensification:

A. Firstly, Inner City should be the starting place to have the most significant intensification, before forcing it onto the residential neighbourhoods, this can give more time to complete a better design vision for our residential neighbourhoods.

i) I ask Council to make better utilization 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'.

Documents included with submission

Document name	PDF version of submission
File	plan29subleah.pdf

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. Haven Road is a perfect example of an area that could be intensified. A single row of apartments all the way from the warehouse to sublime is a place I could get behind intensifying. It is not ruining existing houses views or sunlight and is close to town.

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.

9) On-street carparking:

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.

10) 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. (I do not want to see franklin village style developments showing up all across 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.

11) 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.

Full Name: Leah Collier

Address:

Telephone:

Email: leah_collier18@hotmail.com

Signature of Submitter:

Date: 26/10/2023

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

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

I do not believe all parts of Plan29 are the correct decisions to make. I oppose most of the plan but not all.

1) The Plan Change 29 process

- A. 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. I have found PC 29 lacked early public engagement and consultation by Council. The process has caused severe stress and anxiety for lots of the existing rate paying residents who love their homes and don't want to be built out. A lot of people I have spoken to are completely unaware their property could be affected or just haven't heard anything about PC29 in general.
- C. I am in a position of hope that more qualified citizens than I, will make more comprehensive submissions covering my concerns as to the future of Nelson and its ratepaying residents.
- D. 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.
- E. Had I of known if the Maitai was to have gone ahead then we may not be in position we are in now, I most definitely would have put a submission in then. Just like I'm sure currently there are a lot of people not realising this will affect them. I understand it is a process, however the general person would not have realised this would be the outcome of not making a submission for the Maitai development to go ahead.

2) Hearing panel

- A. I don't completely disagree with the hearing panel however I am nervous it is in favour of PC29 going ahead. I just hope the panel can look at the submissions without bias.

3) Design lead and not developer/social housing lead growth

- A. Nelson is a very special and unique place that needs to be protected with care. We have some incredible historical areas which many people love about Nelson and rightfully so. However our 'Low Rise' City centre could definitely be improved. I believe the inner city centre could definitely be high density. I would not mind it having thoughtfully designed

housing atop of retail/hospitality on the bottom level or two. I see nothing wrong with this. Yes, it may not look as nice as the current layout but if it can stop some residential areas being intensified I am all for it. Nelson city centre does not have much of a vibe, our bars, (most) restaurants and nightlife are mediocre and I do think having the city centre built up could highly improve Nelson in this area.

- B. Residential Neighbourhoods should be protected for future generations to enjoy and new developments thoughtfully designed and planned on a new neighbourhood, by neighbourhood basis to maintain the essence of their character. If everything looked the same all through neighbours it can look very boring and ugly.

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7) Intensification

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- B. I strongly oppose the High and Medium density for the Tahunui hills, Tossill, Tamkai etc
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 - i) I ask Council to consider solutions to mitigate against new-build empty holiday apartments.
- E. 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.
- F. Bigger older properties, could be better utilised and help with our growth if they were more easily allowed to be divided into multi-dwellings.
- G. 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.
- H. As above, younger people studying at NMIT or working in town would also be less likely to have cars/use buses and I believe the inner city is a perfect for this type of resident.
- I. 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. I've always loved rooftop bars in other cities and Nelson could greatly use something like this.
- J. 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 and are not greatly damaging neighbours sunlight.

- K. Contemporary Black Iron Clad Boxes, built only a few metres from 120-year-old Historic Homes is a thoughtless lack of long-term vision for maintaining the attraction of Nelson for all the future residents and visitors.
- L. The area next to Countdown where the Whareama rest home is I believe is a good site to intensify. It is only blocking the supermarkets sun and like council wants, it is close to a town hub.
- M. Green Spaces, Trees and Landscaping are essential for the look and feel of some of our older neighbourhoods. They help considerably with the wellbeing of the residents and help to provide an essential part of the attraction of Nelson, which must all be considered during developing the growth of Nelson.
 - i) I ask the Council to create a broader level of protection for neighbourhoods that still have historic character value from the early settlement years of Nelson.
 - ii) 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.

8) Progressively Phased Intensification

- A. Firstly, Inner City should be the starting place to have the most significant intensification, before forcing it onto the residential neighbourhoods, this can give more time to complete a better design vision for our residential neighbourhoods.
 - i) I ask Council to make better utilization 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. Haven Road is a perfect example of an area that could be intensified. A single row of apartments all the way from the warehouse to sublime is a place I could get behind intensifying. It is not ruining existing houses views or sunlight and is close to town.
- 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.

9) On-street carparking

- 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.

10) 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. (I do not want to see franklin village style developments showing up all across 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.

11) 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.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S537
Submitter Name	Gardner Bickford
Submitter first name	Gardner
Submitter surname	Bickford
Submitter is contact	Yes
Email	gardner@bickford.nz
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General support	Support	Dear Esteemed Council Members, Kia ora, I hope this message finds you well. As we all know, leadership is about making difficult choices for the greater good. With that in mind, I'm writing to express my support for Plan Change 29, but also to advocate for the courageous steps we can take to ensure a better, more inclusive future for Nelson. The subject of urban intensification is a vital one. It allows us to make more efficient use of our land and resources, reducing environmental strain and making our communities more accessible. While I applaud the provisions already included in Plan Change 29 - such as the adjusted height limitations for buildings and encouragement of mixed use development - I believe we have the opportunity to go further. Let's use this juncture to be ambitious. I encourage you to take these suggestions into account as you finalize Plan Change 29. Together, we can lay the groundwork for a Nelson that's not just growing, but thriving. Thank you for your time and dedication to public service. Ngā mihi, Gardner Bickford	Pass Plan Change 29. Consider the following amendments: 1. Reconsider the minimum balcony size for upper-level residential units. Balconies are more than just architectural features; they're small gateways to wellbeing, allowing people to connect with the outdoors. Small balconies can be both practical and delightful, much like you'd see in many international cities. 2. Remove the mandated minimum size for studio and one-bedroom homes. Instead, I propose we defer to established regulations like the Housing Improvement Regulations Act of 1947 for governance. Flexibility can be a catalyst for affordability and inclusivity. 3. Reevaluate the concept of Heritage Precincts within the NRMP. While heritage is important, it shouldn't stifle our progress. Buildings that don't possess historical value, like the one at 42 Seymour Avenue, shouldn't be limited by such designations. 4. Include a requirement for at least 20% of new parking areas, pathways, and sidewalks to be created with permeable materials. The benefits to our environment, especially regarding stormwater management, are not only well-documented but also align with New Zealand's commitment to sustainability.

Documents included with submission

Document name	Heritage Property?
File	heritageproperty.jpg
Description	Should this property be considered a Heritage Property?



Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S538
Submitter Name	Alice Hill
Submitter first name	Alice
Submitter surname	Hill
Submitter is contact	Yes
Email	alicef@gmail.com
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Residential Zones	High Density Residential Zone	Support in part	I believe densification is critical and I support visionary and bold steps to make that happen. I also realise I'm in a position of privilege living in Tahuna with a sea view - this is a resource that should be able to be enjoyed by as many Nelsonians as wish to live here. Progressive planning from international case studies shows that the highest intensification along key transport corridors is a successful approach. Much of the Tahunanui Drive section between Bisley and Wakatu Dr is also geographically suited to this in having a flat bench at road level in front of steep (and somewhat unstable) rise to approx 6-8 stories high. I believe this would be an opportune combination of providing stability/retaining for hillslopes, increased housing and commercial activity adjacent to a transport artery, and limiting impact on views from existing houses behind?	I request more thoughtful consideration on the Tahunanui HDR zoning as currently proposed. I request that planners consider HDR zoning focused on the Tahunanui Dr corridor in addition to (or rather than) on the lower reaches of the slopes between Tosswill Rd and Tamaki St. As middle ground to submitters concerned about the 6 story zoning in the Tahuna HDR, please consider more incremental zoning levels that would allow for a "mid-high" zone, say to allow for up to 4 levels? That may decrease anxiety around the change in character feared by residents used to the Tosswill/Tamaki triangle.
Residential Zones	Other	Support	Nelson needs more housing AS LONG AS ALTERNATIVE TRANSPORT CORRIDORS CAN ACCOMMODATE THE INCREASED POPULATION IT SERVES. For example, bike lanes connecting Tahuna to city centre via Rocks Rd is desperately needed before a logging truck bowls over a cyclist!	I support intensification across all residential zones.

Suburban Commercial Zone	Suburban Commercial Zone	Oppose in part	Tahuna is poised with commercial opportunity given the beach and residential neighbourhood proximity, the SH6 transport corridor, and all the commuters that use this route. Why not create viability for a vibrant commercial hub by enabling commercial/residential hybrid use, less constraints on commercial building size, etc. Make it easy for business to come to Tahuna!	Increase commercial capacity in Tahuna suburban commercial area.
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Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S539
Submitter Name	Shannon Gourley
Submitter first name	Shannon
Submitter surname	Gourley
Submitter is contact	Yes
Email	loushan@hotmail.com
Wish to be heard	No
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose		I Oppose the creation of a high density residential of 3-6 story buildings as proposed currently in the plan 29 and request more investigation in to the requirement around this. I Oppose the change to daylight hours. I Oppose the Boundary rear and side yard change. I oppose the increase of residential units without neighbours being notified.

High Density changes need to be further investigated. I understand change is needed for growth but not at the sacrifice of nelson's current residents. The proposed changes will effect many longtime residents that have carefully chosen nelson to be their home in the location they purchased. The proposed plan will allow the potential of a 19m building going up either side of an already placed single story. Daylight hours reduced will then mean that house now has no way to use solar panels to help with the environment with power. Growing of their own food in the garden due to lack of sun entering that property causing older home to now be cold, damp due to the lack of sunlight causing more of an issue of unhealthy homes. has there been a social impact study done?

Quality controls on building designers and developers to look at increasing the number of housing within a land area. the "green Field Developments should also be looking at intensification as well as all nelson areas.

Residential units without neighbors being notified will have a large impact on street parking and safety.

Central Nelson business area should be first focal point rather than more of the suburb areas. Concentrate on apartment buildings increasing the number of people that can be in the city hub to give the city central life back around the shops and business.

My Street is High density and yet has no more room to connect to stormwater services and new builds currently had to install soak pits. No Green spaces to be able to soak this up should we have a flood

Boundary distances being narrowed created lack of air flow and noise issues. The increased land coverage on a property means more need for larger storm water systems.

Why are new builds not requiring underground water catchments to help with water shortage,

I seek that the proposed areas of high density are looked at and there is thought out planning of neighborhood area. ie Nelson central, Tahunui, Stoke, Atawhai this is where then the consideration of placement, height daylight hours around are then looked at. Fairness to the neighboring properties, not 1 fits all blanket ie Wellington waterfront using the hill for large scale building area housing.

Privacy areas are maintained.

Community development of areas that have not already been build on, a vision of the area with large scale building that will not effect current areas.

Number of Stoke has been built on long narrow section with 2-3 dwellings cross lease already on them. A number being in the High Density zone.

Has a city plan for neighborhoods to be mixed between single story and proposed 19m high building directly impede any house with low daylight hours.

A number of Properties are on Cross lease this also adding to to the issue. Why are not new development areas not (bottom of hillside) not being considered for developments for higher building apartments they would receive sun and not impact Single story builds.

Has it been considered to look at areas and look at a Plan for nelson and outer suburbs of nelson rather than leaving it up to a developer to just build whatever they want with no consideration to neighboring properties.

Ranked Preferences of housing -Nelson Urban - Sunshine is the top ranked importance!

6 weeks to consider a document of over 2000 pages to digest and understand what is actually being proposed is not enough notification from council. I do appreciate that council did try to hold meeting in person and zoom but time frame was still not enough to fully consider the changes. Why is this being rushed and public not notified earlier.

Rec: 31/10/23
Submission: 5540

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

Full Name: Alexandra Jane Cotton

Address:

Date: 31.10.2023

Telephone:

Email: alex.cotton7@gmail.com

Date: 30.10.2023

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

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

I reject Plan Change 29 in its entirety ...

and also wish it to be recorded that

1. I believe the Plan Change 29 Process did not provide an inclusive environment for everyday people to navigate - until it became obvious that the community was not happy with the process. It was excellent to have the submission date extended and for the counsellors to meet with the people. The process prior to this felt dictatorial. A consultative, community lead, problem-solving approach to address Nelson's housing problems, could result in a creative and exciting redefinition of Nelson's landscape- in keeping with the ethos of the region.
2. I found the huge document too long and difficult to read properly
3. I am concerned that the summarising of these submissions will be performed by those who were responsible for developing the plan rather than outside, impartial people.

How this proposal will affect me:

I live in Stoke. In my area houses are currently single storey, with the odd exception, and there is already a lot of infill. Under the proposed new plan we can have up to 3 storey houses built on our sections. This could mean no sun for me and my neighbours and our essential veggie gardens. So many people will be affected. I assume that very few of us will make submissions because we are a good solid working class and social housing area. Actually not too many people in my area even

NDOCS: 539570224-17820

knew about the proposal. So, in Stoke suburbia we may be facing a hotch potch of developers wishing to cash in on the opportunity to build big 3 or 6 storey apartments (with no parking) next door to us. There would be no need for beauty or design or the concept of sponge cities to be considered.

So I am now going to try and use more technical language and am proposing:

1) Design Lead and Not Developer Lead Growth.

- a) Nelson is a very special and unique place that needs to be protected and designed with care and wisdom. Beauty and sunlight are hallmarks of the Nelson region and help maintain community well-being.
- b) We do need many more good quality, well designed homes but these could be placed in new neighbourhoods rather than erected in older suburbs on a site by site basis. These homes could be potentially 2-3 storeys high as the whole neighbourhood would be built from scratch and people would live there by choice rather than waking up one morning and finding a 3 storey complex going up next door. In Stoke, Marsden Valley is being developed and there is room for growth there. A design led solution would enable the character of existing areas to be upheld.
- c) In existing, 1 storey residential neighbourhoods, new developments need to be thoughtfully designed and planned on a neighbourhood- by- neighbourhood basis to maintain the essence of their character and to ensure houses and gardens still receive their sunlight.
- d) Green Spaces, Trees and Landscaping are essential for the wellbeing of the residents and the ecology of our neighbourhoods. It is also necessary for flood minimisation. These areas need to be carefully incorporated into the designs.

I ask the Council to appoint an Urban Development Agency (UDA) and employ qualified designers to carefully guide/ shape growth and to actively facilitate the emergence of cohesive urban neighbourhoods with a variety of quality housing choices.

2) Sunlight Recession Planes and Shading Effects

- a) Sunlight is a huge part of living in Nelson. We are the 'Sunshine Capital of NZ'. It is well known that people relocate to Nelson because of the Sun and accept reduced wages called 'Sunshine Wages' for that privilege. I personally took a drop of 10000k moving from rainy Waikato to Sunny Nelson.
- b) TDC actually 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) 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 *potential* effects: -
 - i) Increased levels of mental health illness, anxiety and stress.
 - ii) Increased levels of damp homes with associated mould and mildew and respiratory illnesses.
 - iii) Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.

- iv) Increased heating costs, air pollution, and carbon foot print, due to a large portion of Nelson housing being older, with un-insulated walls and single glazing....these houses, like my 1944 cottage, are currently sunny and passively heated.
- v) Reduction in property values and increased financial stress, because overshadowed houses would be less desirable to live in.
- vi) Property owners may be reluctant to invest in making additional new (low rise) infill improvements to their sections, as any additional units ***COULD*** be overshadowed and therefore devalued by the construction of a multi-storey development next door.

(1) I ask the Council to maintain the AP15 Daylight Admission protection rules to all pre-existing properties.

(2) I strongly support the inclusion of the 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 daylight 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.

3) 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 encourage residential units to be orientated towards the street or public open space'.

4) Intensification

- a) I oppose the proposed medium and high-density residential zones. It is not in character or in keeping with existing 'Low Rise' Nelson residential suburb and is 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 opposed to all new 'Green Field' developments being used for only single storey dwellings as it is an underutilisation of land that can accommodate increased intensification.

- i) I ask Council to consider building two storey dwellings 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 will require notification and written approval from neighbours, to restrict large 'out of character' accommodation blocks spanning multiple sections, and taking up on street car parking spaces.

Other ideas for intensification:

Bigger older properties, could be better utilised and help with our growth if they were more easily allowed to be divided into multi-dwellings.

Building 1 and 2 bedroom inner city apartments could attract older people or young couples to urban living, and this could free up bigger homes for new families to occupy. The urban apartment dwellers could bring life back to the CBD.

5) Progressively Phased Intensification

- a) The Inner City should be the starting place for significant intensification, rather than starting intensification in suburban areas. This would enable more time for designers and the community to envision and plan our residential neighbourhoods.

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) The City Fringe would be the next zone to phase in for intensification.
 - i) I ask Council to negotiate and/or incentivize Industry and car yards to relocate, to less essential land that can be better used for accommodation.

6) 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.

7) On-street carparking

- 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.
 - 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.

8) Social Housing

- a) Significant care and attention must be considered with all social housing to avoid disharmony in communities.
- b) 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 work with the long-term design vision of Nelson.

9) Infrastructure

- a) I ask the Council to include a plan to mitigate against future drought situations
- 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.

That is it... my very first submission.

Thank you for reading this and putting forward my concerns and ideas.

Kind regards,


Alex Cotton

SS41

Voided

Online submission

Received: 31/10/2023
NDOCS-539570224-18391

This is a submission that was made online via the Council's website.

Submitter No.	S542
Submitter Name	Susannah Roddick
Submitter first name	Susannah
Submitter surname	Roddick
Submitter is contact	Yes
Email	s.roddick@xtra.co.nz
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose		I am asking Council to withdraw PC 29. I ask t at NCC staff refine the plan design, and review the process and professional structures that will guide the plan and then put it back out for public submissions. My oppose because of process, and I oppose because of substance re HDRZ 6 storey intensification, sunlight, and the need to use professionals and design expertise to create and to communicate a more gradual and nuanced approach to this vital plan.

Concerns on Process

1. My feedback is in response to NCC's own statement that this is the biggest Plan change ever done. That is why I am distressed that something this complex, huge and significant is so confusing to understand, and appears to be reliant on citizens such as me, studying complex documentation in the evenings and trying to distil and respond. The NCC process for something this major requires an entire rethink, using far more expert, trained and diverse people, than someone such as me. That's why we have a Council and why I reject the proposal in its entirety, due to this flawed process.

2. I also feel that if I don't feed back, then feedback will risk being dominated by developer-led interests, who are familiar and expert in such detail. So I feel worried that I've got to comment on such a huge and complex plan change, ranging from light planes, angles, to object assessments and flood risk. I expect the NCC to be leaders in our city's future, and to set the tone, expertise, and a graduated approach to change that is progressive, and not rushed, and to lead out with a vision for our city.

3. I agree with the creation of some kind of an Urban development agency, to work on such a planned approach for our residential development, and a planned approach to protect heritage facades, areas, and buildings. (There has to be a better process than NCC releasing 100s of pages, with high stakes for us all – to which residents, such as me, then have to feedback on).

Concerns on High Rise intensification and sunlight

1. I strongly reject the High-Density Residential Zone. This goes beyond what the government's intent appears to be. It appears as if NCC has suddenly moved from zero to HDRZ. Without a strong sense of what MD looks like, or could look like. Intensification should be done gradually and thoughtfully, and be lead by design that maintains neighbourhood character and links to public transport, cycleways, greenery, play space and sustainable living. I support a minimum of 2 storeys on greenfield sites.

2. I am very much against so much high rise, across our residential areas, and up to 6 stories. While I support intensification, however I strongly disagree with 6 story buildings. That would make our city a dreary place, reduce sun and space for plants and for people who enjoy both, increase wind being funnelled, create a narrowness, and lack of sky. The NCC wants to be encouraging and leading in livable design, The NCC images used to discuss 6 stories are not ever 6 storey images. So I'm distressed the plan allows for so many buildings higher that Bett Apartments (which is not even 6 storeys).

3. I do not see local examples in the plan of low rise that is well-developed, so it is hard to imagine, and the revised plan should identify what the current barriers are to this in Nelson. I ask that the NCC present clear information on how low rise buildings might look, and ensure a good proportion are also affordable. Otherwise, why bother? The NCC plan should promote good examples, explore why they're not common now, and inform us on ow they could be well-developed and livable.

4. The NCC has to avoid the risk of creating any incentives for people to only sell to a developer, who'd then create high rise, which would then would lead to adjacent neighbours finding that they had no choice but to do likewise, because who'd buy a 1-2 storey place behind a 6 storey place? Only a developer would do that. I ask that the NCC can anticipate these obvious risks and perverse incentives.

5. The Plan includes some good ideas that seem to retain sunlight around a building's sides and rear, and privacy. But I can't comment on this in detail, except the principle is vital to residents' outlook.

6. I'd welcome creating incentives or removing barrier for residents to replace one large home with multiple homes, as long as this meets the daylight, sun, amenity values as per Urban design

7. The Inner City requires a coherent and proactive leadership from the Council. I know it's a huge challenge and I encourage boldness, vision and leadership. The answer to our inner city decline is not car parking, as the years of free parking have proven. I support NCC to be proactive in creating disincentives and limitations on unoccupied homes for long periods. While also creating financial disincentives to inner city landlords who have unoccupied buildings (street front and first story).

8. Low rise density living may support the vulnerable where it is affordable, and I support NCC working closely with Kainga ora on this. Again, I encourage NCC to lead in this.

Thank you

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S543
Submitter Name	Paul Searle
Submitter first name	Paul
Submitter middle name	Michael
Submitter surname	Searle
Submitter is contact	Yes
Email	paul.searle@rocketmail.com
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose		Scrap the current plan. Regroup after 2024 Local Body elections, with a fairer range of proposals and with a panel of five or seven Councillors elected on th ir position on PC29

Documents included with submission

Document name Paul Searle, PC29 Opposition submission letter

The reduction in daylight permitted by multi storeyed development, one metre from Boundaries is Barbaric. Why should anyone be allowed to build a property that overlooks and impinges on neighbours. This will not result in better quality of life and social harmony, but the opposite. I have experience in the UK and Europe of failed social housing developments, with run down lifts, overcrowding and dampness. These countries demolished most of their high rises two decades ago, as the poor quality builds and conditions were unfit for happy and healthy living.

Current Council proposals benefit in reducing greater affordability for young families and first time buyers is inaccurate. Mayor Smith cited Betts apartments as a 'good', inner city development. I agree, that these are tasteful 3 storey units. The cost of a similar development this year would be over 1.5 Million for a 2 bedroom flat. The prices being rumoured for single bedroom KO units, without parking on Examiner Street are 600K build cost. Not affordable, and only an option for 'any cost' Government spending.

Limited and case by case six storey development in the current CBD between Selwyn and Halifax Streets could be appropriate, if adequate car parking was provided as a condition of consent. Buxton and Montgomery carparks for example, provided parking was retained on lower 2 floors.

I would also support development in the Maitai Valley if developers were made to contribute appropriately for infrastructure and drainage costs to support the subdivision. I would support carefully relaxed set-backs to allow moderate infill with town houses and granny flats, to allow multi generational living.

The current make-up, with only two Councillors, who both appear strongly biased towards development will be unlikely to deliver a democratic result for the people of Central Nelson who will be most negatively affected by the proposed changes.

Opposition to PC29 by affected residents observed at Council meetings has been fairly unanimous.

The Councils actions in approving the proposal have caused huge stress among residents. This is disgraceful Bullying by Government, and NCC have done very little to protect their customers and voters from this outside mandate.

I wish to be heard by the panel in support of my submission. I have no trade advantage.

Signed - Paul Searle

Paul.seare@rocketmail.com

NCC Plan Change 29 Submission

Paul Searle

As a resident of the proposed HDRZ, I strongly oppose Plan Change 29, which needs to be scaled back..

The scale of policy and planning control changes oversteps the projected population growth tenfold.

The reduction in daylight permitted by multi storeyed development, one metre from boundaries is barbaric. Why should anyone be allowed to build a property that overlooks and impinges on neighbours. This will not result in better quality of life and social harmony, but the opposite. I have experience in the UK and Europe of failed social housing developments, with run down lifts, overcrowding and dampness. These countries demolished most of their high rises two decades ago, as the poor quality builds and conditions were unfit for happy and healthy living.

Current Council proposals benefit in reducing greater affordability for young families and first time buyers is inaccurate. Mayor Smith cited Betts apartments as a 'good', inner city development. I agree, that these are tasteful 3 storey units. The cost of a similar development this year would be over 1.5 Million for a 2 bedroom flat. The prices being rumoured for single bedroom KO units, without parking on Examiner Street are 600K build cost. Not affordable, and only an option for 'any cost' Government spending.

Limited and case by case six storey development in the current CBD between Selwyn and Halifax Streets could be appropriate, if adequate car parking was provided as a condition of consent. Buxton and Montgomery car parks for example, provided parking was retained on lower 2 floors.

I would also support development in the Maitai Valley if developers were made to contribute appropriately for infrastructure and drainage costs to support the subdivision. I would support carefully relaxed set-backs to allow moderate infill with town houses and granny flats, to allow multi generational living.

The current make-up, with only two Councillors, who both appear strongly biased towards development will be unlikely to deliver a democratic result for the people of Central Nelson who will be most negatively affected by the proposed changes.

Opposition to PC29 by affected residents observed at Council meetings has been fairly unanimous.

The Council's actions in approving the proposal have caused huge stress among residents. This is disgraceful bullying by Government, and NCC have done very little to protect their customers and voters from this outside mandate.

I wish to be heard by the panel in support of my submission. I have no trade advantage.

Signed - Paul Searle

Paul.seare@rocketmail.com

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S544
Submitter Name	Andrea Papai
Submitter first name	Andrea
Submitter middle name	Edith
Submitter surname	Papai
Submitter is contact	Yes
Email	andrea.papai@yahoo.com
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose in part		PC 29 to be cancelled and a new plan drawn up.

Dear Senior Planning Administrator,

I do find the Plan 29 flawed. So flawed, I reject it in its entirety, but if it is not rejected then here are my feelings.

Firstly, this has caused my family and I a lot of stress. We live on Locking Street which is a MDZ under PC 29 (MDZ on that unstable hill You've got to be joking). However, as the crow flies, we live 25 metres away from a Kainga Ora property (4 Examiner/57 Wellington Street which is HDZ under PC 29).

I have talked to Kainga Ora and they have told me that that development is on hold until the outcome of PC 29. One can only imagine that they only want to go higher than their original plan of 3-storeys!?!

While I understand the need for social housing, it would be not right and very unfair to cause the loss of the current sunshine we get and to put us in shade! Please note, in the winter, we lose the sun behind the Mount Street Hill in the early afternoon. We don't want to lose it in the morning also!

I also have a view looking out to Church Hill and it would not be right and very unfair to cause the loss of that. After all, that's why we purchased the property!

Parking: Parking is already difficult in our community thanks to the narrow streets and the difficult access into driveways. This especially applies to Locking street and the corner where Locking and Wellington Street meet. Sometimes it is hard to drive up Locking St the way it is now! God help any emergency vehicle trying to get up Locking Street if it becomes more congested! Locking St is a resident only street but nobody enforces that and it is still very much used as a rat run. If you are walking up or down the street you are taking your life into your own hands. Cars still speed on Locking even though the bumps have slowed them down a bit. I don't want it to become worse than it already is.

We would not like to further lose our privacy and peacefulness either and have more people looking down on us and making noise on our street and nearby streets. We already have

enough drunk people causing damage and disruption on narrow Locking Street. A big social housing block in our area isn't going to make things better.

I am also concerned about the rest of the city and believe careful planning and design needs to be done if Nelson is to be intensified. It needs to be done with care and respect for existing residents. Nelson should be a beautiful city and have its own style. Not quickly and cheaply designed by developers out to make a buck. Residents shouldn't be pitted on each other so a well thought out plan needs to be made. Made with input of the local residents and actual architects/designers who care about now and the future. We local residents need to be consulted and our views taken into serious consideration.

I would like to it made easier for a tiny home or a granny flat be added to existing properties so intensification is done with blocking people's sun and views. These would be single storey.

Below are some other points and an expansion of some points raised above.

The Plan Change 29 Process.

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.

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.

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.

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.

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 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.

Hearing Panel

I strongly disagree with the make-up of the hearing panel, because of its 'biased' public perception following the vote on Councillor Courtney's proposal to withdraw PC29 at the 14th September Council meeting.

I ask the Council to appoint Councillors from either side of the Sept 14th vote.

NCC's Population forecasts

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 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.

Design Lead and Not Developer Lead Growth. Nelson is a very special and unique place that needs to be protected with care. 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 been a cherished holiday destination for many New Zealanders.

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.

We need to protect and retain CBD historic facades as an essential part of the character of the Inner City.

Contemporary Black Iron Clad Boxes, built only a few metres from 120-year-old Historic

homes is a thoughtless lack of long term vision for maintaining the attraction of Nelson for all the future residents and visitors. Green Spaces, Trees and Landscaping are essential for the look and feel of some of our older neighbourhoods. They help considerably with the wellbeing of the residents and help to provide an essential part of the attraction of Nelson, which must all be considered during developing the growth of Nelson.

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 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.

Sunlight Recession Planes and Shading Effects
Sunlight is a CRITICAL part of living in Nelson. It is not called the 'Sunshine Capital of NZ' for no reason. It is well documented that people relocate to Nelson because of the Sun and accept reduced wages called 'Sunshine Wages' for that privilege.

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/>

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 exasperated due to a large portion of Nelson housing is old, with un-insulated walls and single glazing and open fires were legislated out of use many years ago.

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 afford to heat their home. 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.

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.

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 daylight 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.

Privacy and Outlook

Privacy is a critical part of enjoying a property. 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 encourage residential units to be orientated towards the street or public open space'.

Intensification

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 ask Council to remove HDRZ from the plan completely.

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.

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 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.

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 ask Council to consider solutions to mitigate against new-build empty holiday apartments.

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 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.

Bigger older properties, could be better utilised and help with our growth if they were more easily allowed to be divided into multi-dwellings.

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.

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. 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.

Progressively Phased Intensification

Firstly, Inner City should be the starting place to have the most significant intensification, before forcing it onto the residential neighbourhoods, this can give more time to complete a better design vision for our residential neighbourhoods.

I ask Council to make better utilization of Car Only spaces, by developing them into shared spaces, with Accommodation overhead.

'Nelsust' highlights 44% of the Inner City as Car only spaces.

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'.

Secondly, City Fringe would be the next zone to phase in for intensification.

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 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.

Intensification in hazard zones

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.

On-street carparking

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 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.

I ask Council to use traffic calming solutions that do not lose on-street car parking spaces. Eg. Speed Humps, instead of Choke Points.

Social Housing

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.

High density living for the homeless and vulnerable will not result in healthy outcomes for all concerned.

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 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.

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.

Infrastructure

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. I ask the Council to include a plan to mitigate against the increased capacity requirements for our waste water systems.

I ask the Council to include a plan to mitigate against the increased capacity requirements for storm water.

Regards,
Andrea Papai

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S545
Submitter Name	Jeremy Butler
Submitter first name	Jeremy
Submitter middle name	Zachariah
Submitter surname	Butler
Submitter is contact	Yes
Email	voyageofthebeagle7@gmail.com
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General support	Support	The plan change supports the development of density and promotes mixed use developments.	Overall I support the Plan Change, however there are some important improvements that I feel should be made. These are detailed in my following submission points.

Residential Zones	Medium Density Residential Zone	Support in part	Design is an important element of medium density development. A design-led approach is necessary to guide development. The MDRS approach is suboptimal in larger cities, and should not be adopted by NElson, even in a modified form.	To confirm the Medium Density Residential Zone However, the rule provisions should be reconsidered and I do not support using the national Medium Density Residential Standards (MDRS) as the basis for the bulk and location of buildings. The MDRS is a poor standards to base medium density development on. Instead the Council should develop guidelines or a design-led process that promotes quality medium density design. This is a qualitative assessment and could be achieved through a wider use of the Urban Design Panel or similar. The rule framework should make good design mandatory, but recognising that every site is different and design should respond appropriately to the constraints of the site. In other words, the rules should less reflect numerical building envelope parameters, and instead should achieve quality design outcomes through complying with guideline documents, and/or expert assessment.
Residential Zones	High Density Residential Zone	Support in part	as for medium density residential zone	as for medium density residential zone
Transport	Transport rules	Support	Better support public transport and active transport	Support all transport rules, including destination facilities, cycle parking, maximum parking numbers, etc

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S546
Submitter Name	Michelle Collier
Submitter first name	Michelle
Submitter middle name	Ann
Submitter surname	Collier
Submitter is contact	Yes
Email	michelle.collier@xtra.co.nz
Wish to be heard	No
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose		I would like the council to overturn plan change 29 and consider the feedback from the community that oppose losing sunlight, privacy and views to their properties.

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) 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 Councillors from either side of the Sept 14th vote.

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 with care. 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 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.

d) Contemporary Black Iron Clad Boxes, built only a few metres from 120-year-old Historic Homes is a thoughtless lack of 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 some of our older neighbourhoods. They help considerably with the wellbeing of the residents and help to provide an essential part of the attraction of Nelson, which must all be considered during developing the growth of Nelson.

i) 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.

ii) 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. It is not called the 'Sunshine Capital of NZ' for no reason. It is well documented that people relocate to Nelson because of the Sun and accept reduced wages called 'Sunshine Wages' for that privilege.
- 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) 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: -
 - i) Increased levels of mental health illness, anxiety and stress.
 - ii) Increased levels of damp homes with associated mould and mildew and respiratory illnesses.
 - iii) Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.
 - iv) Increased heating costs, air pollution, carbon foot print, are all exasperated due to a large portion of Nelson housing is old, with un-insulated walls and single glazing and open fires were legislated out of use many years ago.
 - v) Reduction in property values and increased financial stress, because the house would be less desirable to live in.
 - vi) Residents, struggling with the cost-of-living crisis may not afford to heat their home.
 - vii) 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 daylight 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 encourage residential units to be orientated towards the street or public open space'.

7) Intensification

a) I strongly oppose the Medium/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 MDRZ and 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, Inner City should be the starting place to have the most significant intensification, before forcing it onto the residential neighbourhoods, this can give more time to complete a better design vision for our residential neighbourhoods.

i) I ask Council to make better utilization 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.

9) Intensification in hazard zones

a) I question councils plan to allow up to 3 to 6 story dwellings on Tosswill road and Tamaki street, or general Tahunanui hills area as not being appropriate for the area given that it has been assessed as vulnerable and 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 not be built on in this manner.

10) On-street carparking

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.

b) This will cause fracturing of neighbourly relations and communities, the Tahunanui hills area is already narrow and dangerous with carpark pressure currently let alone increasing housing.

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.

I strongly oppose the Tahunanui hills area being used for the following reasons

1. Slope instability

We were informed by the NCC planner that there was no consideration of geotechnical issues when deciding on the proposed zoning of the area. Our biggest concern is that high density development will increase the potential severity of future slips on the Tahunanui Hills. The proposed HDZ in the Tahunanui Hills is an area potentially affected by significant natural hazard of slope instability. Plan change 29 Housing and Hazards on the Nelson City Council website stated that intensification should not include areas potentially affected by significant natural hazards:

enabling the intensification of development on land currently zoned for residential and commercial uses (Residential Zone, Inner City Zone, and Suburban Commercial Zone), that is not within areas potentially affected by significant natural hazards”

There is an instability hazard overlay on 8 of the properties out of the 44 in the new proposed HDZ for Tahunanui Hills. This includes 4 Tamaki Street, 113 and 111 Tahunanui Drive, and 13, 15, 17, 23 and 19 Toss will Rd. Beca’s 2022 report on slope instability said that damage observed along these old sea wall slopes post-August 2022 indicate they pose an elevated risk due to over-steepened slope profile and weathering.

Furthermore, all of the properties covered by the proposed HDZ have a condition (Condition 1) on their property title with the Council. Condition 1 is on the NCC NRMP register and states that the land may be of suspect stability and conditions must be in place including geotechnical reports for any developments. This has resulted in geotechnical reports being completed where property owners have undertaken development. Geotechnical reports have recognised the instability of the steep hill and required extensive foundations and work even for single story buildings. The proposed hazard overlays for slope stability do not include these Condition 1 properties but that does not mean there is no risk now especially with higher intensity of rainfall and intensification of the land. Beca produced a slope stability report in 2021 that stated regarding the Tahunanui Hills that (emphasis added):

“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”

Many properties in the proposed HDZ have already experienced slips, such as at Toss will

Road where slips have blocked Tosswill Road several times.

Dr M. R. Johnston Consulting Geologist (in a 2018 report) recommends that all developments in hill areas other than minor structures and earthworks involving cut and fill faces less than 1m in height and thickness and/or fill comprising no more than 3m³, on sloping ground be subject to geotechnical input so as to minimise the risk of slope instability:

"It is recommended that the Hill area is requiring geotechnical assessment or Geotechnical assessment requirements for hillsides...

One specific geotechnical condition is C418 that applies to the abandoned sea cliff that extends along the former waterfront from Annesbrook to Tahunanui. These cliffs are cut in relatively weak rock whose stability is decreasing as weathering progresses. The areas referred to in C418 could be, subject to a revision of its boundaries, incorporated into a slope risk overlay".

We have observed in dry weather large cracks on the dirt and grass around our house and we have had springs pop up then go away after a period of months.

During our time living on Tosswill road, we have experienced several high rainfall events where access to our home has been cut off after slips have occurred on both sides of Tosswill Road, We have observed weeping coming through new seal in Tosswill road from small springs after heavy rain, this road has been repaired many times with visible patches in the length of the road. Seismic activity combined with a storm event in a high-density area could be a disaster as mentioned in several reports on the Tahunanui slump.

There has been no geotechnical input into what intensification (of up to six-storeys) will do to the stability of the Tahunanui Hills. Climate change will increase adverse weather events with even greater potential to create slips on the hill.

The Beca Report on slope stability zones (dated 9/12/2021) recommended future work for land earmarked for future development as follows (underlines added):

1. The physical extent of the slope instability overlay may additionally be expanded to include areas of interest outside those included in this study, such as land earmarked for future development.
2. The overlay set out in the Beca report has been prepared from desk study only. refinement of the instability and run-out zones may be completed from field mapping. This step may be applicable for developed areas on land particularly prone to landslides and/or land earmarked for future development.
3. Report does not identify full extent of areas impacted by slope instability across hillslopes.
4. Risk assessments require additional considerations, including likelihood of slope failure and the potential consequences to a particular element at risk. Neither of these are considered in our susceptibility overlay given its primary purpose is to inform the need for further geotechnical assessment.
5. Does not show deep seated failures (i.e. Tāhunanui Slump), nor areas of hill creep. The maximum downslope extent of solid debris difficult to determine.
6. Tāhunanui - An extensive scarp formed along the head scarp of the Tāhunanui slump core below Princes Drive. Deep seated movement impacting multiple residential properties was recorded in this area. Shallow slope failures were additionally observed along the abandoned sea cliff along Tāhunanui Drive and near Port Nelson

2. Amenities

The NCC planning team stated that the Tāhunanui Hills were chosen for the proposed high-density development because of their closeness to amenities. The amenities referred to (being the school and shops) are down a steep set of stairs and across State Highway 1, not easily accessible for young families, the elderly, or the mobility impaired without a vehicle. There are no supermarkets within walking distance of the proposed HDZ in Tāhunanui which would be a serious issue for all the HDZ residents with no vehicles.

3. Traffic

The Tāhunanui Hills is serviced by narrow, winding streets which in our opinion are inappropriate to service high traffic volumes. NCC recently installed speed bumps along Tosswill Road to slow down traffic which uses this road as a thoroughfare to and from Nelson City. The road is very narrow and from my time living here, we have seen several incidents and near misses due to the narrow winding nature of the road where cars often cross the centre line. In addition, accessing Tāhunanui Drive from Tosswill Road can be very difficult and dangerous and would need significant upgrading before this scale of development could be accommodated on the hill. We consider that the potential traffic produced by high-density development in this area has not been considered in enough detail as to whether it is appropriate. The same is likely for other infrastructure provisions to the area, such as Three Waters servicing. There are several reoccurring slip zones onto Tosswill Rd that make it even more dangerous.

4. Sunlight and Shading Effects

Sunlight is an essential part of living in Nelson and why we chose to live on the Tāhunanui Hills.

Our house has been built for the sun and for the garden to receive sun. It will be subjected to the loss of sunlight by neighbouring intensification with the following possible effects:

- Three sides of our property could have 6 story high apartments one metre from the boundary and 1 side 3 storey completely enclosed our property in a very high box of buildings. This could compromise our health and mental state.
- Hill properties like ours already have additional shading issues directly from the hill which is another reason for not having high density development on hills.
- The lack of sunlight could result in existing homes becoming dark and damp with associated mould and mildew.
- Our house could lose property value if it loses the view, sunlight, privacy and is surrounded by apartments.

- Privacy and outlook are a critical part of enjoying a property.

5. Trees and Gardens in the Tāhunanui Hills HDZ

There are many established large trees (over 6 metres high) in this Tāhunanui Hill HDZ that are helping stabilise the ground and providing a habitat for our native birds. These will be lost when there is no sun to support their growth or removed to make way for intensive development.

We have counted the large trees in the Tāhunanui Hill high density zone and there are approximately 1200 trees over 6 metres in height. They form part of the green garden canopy. There are direct benefits for maintaining and increasing leaf area index, or green spaces, in our suburb particularly with climate change increasing temperatures and heat extremes. Access to green spaces leads to an improvement in mental and physical wellbeing. Trees help with air pollution. They also play a vital role in storing and filtering water which helps prevent slips on the hill.

Trees provide a habit for our native birds, thus improving biodiversity in our urban setting. The Tāhunanui community has actively been killing rats and we now have established communities of Weka, Tui, Kereru and Piwakawaka. We see these birds every day on our property. Their habit could be destroyed with high density development. Most Tāhunanui Hill residents have productive gardens with fruit and nut trees and vegetables which will no longer be viable with the shading.

6. Recreation

Tamaki Street is one of the steepest streets in New Zealand and it has over 400 steps at the top to Princess Drive. Many walkers, runners, tourists and locals walk daily from the bottom of Tamaki Street up the hill for fitness, well-being and to enjoy the peaceful beautiful view down the hill to the sea. We estimate around 100 walkers a day walk up and down Tamaki Street. They enjoy the established gardens and birdlife. This city walking trail could become more shaded and

dangerous with increased shading, reduced amenity, and traffic from the intensification.

7. Intensification

It will be expensive for developers to fulfil the requirements to build 3 to 6 storey buildings on the hill. The resulting apartments therefore would be fewer in number and expensive to buy. The Tāhunanui HDZ could easily become developments of expensive holiday apartments that sit empty for long periods. This does not solve our intensification, growth, and affordability dilemma, and yet it locks up our valuable housing resource.

We are opposed to new 'green field' developments being used for only single storey dwellings as it is a complete underutilisation of land that can accommodate increased intensification without affecting existing suburbs. The inner city should be the starting place for the most significant intensification before moving onto existing residential neighbourhoods.

In summary I believe that the CBD, Greenfield developments, the Haven road area or any area like that backing onto a hill that doesn't impact other property owners make perfect sense to being used for higher density housing but allowing this in existing built up areas show a distinct lack of planning and thought and will create a Nelson that has no character and is a mixed mess of housing types, we should be looking to create a Nelson that has a vibrant city centre with well planned green spaces, a beautiful waterfront, appropriate housing that fits with the character of the city.

Thank you for taking the time to read my submission.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S547
Submitter Name	Karen Loh
Submitter first name	Karen
Submitter surname	Loh
Submitter is contact	Yes
Email	ng.karen.ak@gmail.com
Wish to be heard	No
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose		We ask Nelson City Council to stop Plan29. We want a longer time to talk with the community about making houses more affordable in Nelson. We should look at real data about how many people are coming to live here and what kind of houses they like. We think if the community helps make decisions, the housing plans will be better and more people will agree with them.

Change Too Fast vs Slow
Change:

Between Nile Street and Nelson College, and between Rutherford and Collingwood Streets, there are old houses and small buildings. People here are close, like during COVID-19 and emergencies. If we build tall buildings fast, it will look different and maybe hurt the community feeling.

Keep Small Town Feel:

Many people, including me, live here because it feels like a small town. We like houses with gardens and quiet, not like big cities. Tall buildings near our houses will change this feeling and maybe make life not so good.

Talk to Community:

Plan Change 29 (PC29) doesn't talk to the community enough. This means decisions might not be what people want. I don't like PC29 because it doesn't ask people about things like shadows or how it changes the community. Pushing PC29 fast without thinking about the future and people's feelings is not good. Not talking to everyone is not how we should make city plans.

Not Enough Information:

Plan Change 29 (PC29) will change Nelson a lot. But they didn't tell people enough. I get letters about small things, like fixing water, but not about big changes to my house area with PC29.

Hard Online Papers and Short Time:

The PC29 papers on the internet are hard to understand, and there's not

much time to talk about them. This makes it hard for people to say what they think.

Different from Old Plans:
PC29 is different from old plans for Nelson. Before, they said buildings can be 11m tall, but now they say 12m. This is confusing and makes me wonder if the planning is good.

Not Clear Information:
The information about the Nelson Plan and future plans was not clear. I live in a quiet area, so I thought big changes wouldn't come here. But the words they use are hard to understand if you're not a city planner. I only knew about these changes because someone else told me. This shows that PC29's information is not good enough.

Online submission

This is a submission that was made online via the Council's website.

Submitter No.	S548
Submitter Name	Timothy Ng
Submitter first name	Timothy
Submitter surname	Ng
Submitter is contact	Yes
Email	timothyng33@gmail.com
Wish to be heard	No
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose		We ask Nelson City Council to stop Plan29. We want longer time to talk with community about making houses cheaper in Nelson. We need to look at how many people come to live and what houses they like. We think if community helps decide, housing plans will be better and more people will like them.

I'm okay with more buildings in the city. We need more houses because more people are coming to live here. But I want the city to grow in a good way that fits with how it is now. I don't like Plan29 for these reasons:

Shadows and Privacy:

Plan29 will make buildings that are too tall. This can block the sun for other houses and make them dark. This is not good for people living there and can make houses cost less. Also, tall buildings can look into other people's houses, and this is not private. I've heard of problems like this in other places:

In Auckland, some six-story buildings block the sun for other houses.

In Christchurch, the rules for building don't think about different areas, so some places get too much shadow or lose privacy.

Some new apartments in Auckland are not designed well and cause problems with shadows and privacy.

In New Zealand, some big buildings can make living conditions bad, like too much shadow or no privacy.

In Christchurch, some buildings are too tall and block the sun, hurt privacy, and damage green areas. A study also said that these tall buildings can make living not so good.

Better Building Plans:

We need to think more about how we build. In Lower Hutt, they made a plan that made too many houses too fast, and people didn't like it. We should learn from that.

Confusing Information:

The information about the Nelson Plan and future plans was not clear. I live in a quiet

area with small buildings and thought big changes wouldn't come here. But the words they use are hard to understand if you're not an expert in city planning. I only knew about these changes because someone else told me. This shows that the information about PC29 is not good.

Keep the Area Nice:

More people are coming to Nelson, so we need more houses. I'm okay with taller buildings (4-6 stories) in the city center where there are already big buildings. But I don't want them in family areas. We can make more houses by building two-story apartments or dividing big lands into smaller parts. This fits better with how our community looks and feels.

Random Big Buildings:

From what I understand, Plan Change 29 says we can have many tall buildings, but not many will be built for a long time. This means some areas might get big buildings and look different, while others stay the same. This can make our city look messy.

Traffic and Parking Problems:

Tall buildings mean more cars and traffic. The new plan doesn't talk about car parking much. Even if they hope people won't use cars much, in Nelson, most families need a car for shopping, work, or fun. Our buses aren't enough for everyone. If new buildings don't have parking, streets will be full of cars. This can be dangerous for people walking, kids, and bikers.

Old City Systems:

The city has old systems for things like water roads and

things like water, roads, and services. These were made for a smaller number of people living in small buildings. If we have more people in tall buildings, these old systems might not work well. For example, some areas get flooded when it rains a lot because the drains are not good.

Need Better City Systems:

If we want more people in tall buildings, we need to make our city systems better first. The city should make sure everything works well before changing the area rules. If they don't plan well, people will have problems.

S549

Voided

S550

Voided