NDocs: 5395702 24-18262
Rec: 31/10/23
Sub No: 5211

Rev 0.2a

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: Katy Kerby (Jane)

Address:

Nelson 7010

Telephone:

Email: Kumarakerby@hotmail.com

Signature of Submitter:

Date: **31st October 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 PC 29 in its entirety, but if it is not rejected then these are my points...

1) **The Plan Change 29 Process. I want to acknowledge...**
   a) That I have found it difficult to digest the total effect of the proposed PC 29 and its supporting documentation due to its size and complexity.
   b) That access to a paper copy of PC 29 and the Section 32 reports has not been made available for residents who do not have access to, or the ability to use a computer.
   c) That I have found PC 29 lack of early public engagement and consultation by Council, with its severe implications towards the well-being of existing rate paying residents enjoyment of their properties, extremely stressful, very time consuming 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 in its entirety, so they can formulate and articulate a suitable response.
   f) The severe lack of Trust between residents and Council has become significant given the following:-
      i) The PC29 submission timeframe was only extended from 27 to 56 working days because of public pressure at 7th Sept public meeting.
      ii) PC29 media engagement was only increased because of public pressure at 7th Sept public meeting.
      iii) Information regarding the negative impacts on existing residents' enjoyment of their properties is not forthcoming in every interaction with NCC members and staff. It is

'Deceit by Omission' and has required individuals to research PC 29 to find out these aspects and share them with the wider public. Eg.

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

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.
    ii) If i) is not followed then I ask that all Councillors are replaced with independent Commissioners.

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 **'home grown'** projections that require the scale of intensification to be greater than those of Statistics NZ. I refer to the submission by Demographer, Dr Geoffrey Hayes.
b) When challenged, NCC staff and the Mayor, always refer to the wider Nelson-Tasman regional growth, which is beyond the scope of PC29.
    i) I ask the Council to use Statistics NZ medium projection forecasts for Nelson, 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 completely out of character and lacks a long-term vision for maintaining the attraction of Nelson for all the future residents and visitors. See attached photo (out of character 1)
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 to that of areas of historic character value from the early settlement years of Nelson and stop future 'out of character' developments.

ii) I ask the Council to appoint an Urban Development Agency (UDA), as per the Nelson Tasman 2050 proposal, (attached) 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) I am unable to find a section 32 report regarding the winter sunlight shading effects on neighbouring properties. The daylight admission testing in the B&A memorandum dated 15/3/23 are only about maximising building bulk and height to enable increased floor plates at upper levels on a typical size section, rather than any loss of sunlight and the shading effects of a neighbour.

d) Shape Nelson Website provides misleading information on 'How PC29 could affect you' with no mention of completely losing sunlight amenity with possible total shading over the winter months. Quote:- "**Daylight admission** - the maximum allowable building height decreases as the building gets closer to the side and rear boundaries, so that taller buildings leave space for daylight to get to the neighbouring properties".

e) 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.

viii) NCC & TDC 'Housing We'd Choose' report dated June 2021 by M.e Consulting ranks 'Sunny' as the highest preference for housing choice in Nelson and yet PC29 will remove that amenity from its exiting residents, without warning or compensation.

(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 no greater than 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.

iii) I strongly oppose the Medium and High density plan change in the Tahunanui Hills area (Tosswill, Tamaki etc).

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 a 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. See attached photo (city area taken up by cars).
    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 without providing off street carparking will result in significant hazards to pedestrians and road users in some areas of Nelson where roads are extremely narrow, with little or no footpaths, no berms, high retaining walls, steep drop offs and no turning spaces. Some of these roads are all much narrower than would be expected under modern standards with some being barely a single vehicle wide.
b) On street parked cars, have also narrowed two-way roads down to single lane for two-way access and forced parking on footpaths to become the 'norm'.
c) Drivers must carefully share the roads with each other, cyclists and pedestrians, frequently having to pause where there is available space to allow vehicles to pass. Sometimes this requires driving over the kerb and onto footpaths.
d) In places trucks, including the weekly waste collection vehicles have to reverse quite long stretches because of the lack of anywhere to turn.

e) In places, visibility of oncoming vehicles is also very poor and dangerous.
f) Driving up and reversing out of very steep driveways is challenging at best and potentially unsafe.
g) Access for pedestrians, mobility scooters, cyclists, refuse collection and Emergency Service vehicles is difficult and unsafe.
h) Intensification, without providing on-site car-parking in these narrow road access areas will cause fracturing of neighbourly relations and communities who live in these areas.
    i) I strongly recommend that the Hearings Panel conduct a thorough site inspection of the narrow streets of Nelson including, (but not limited to) Locking St, Mount St & Konini St, Tosswill Rd, Tamaki St, Chamberlian, including on foot.
    ii) I ask Council to provide a 'Comprehensive car parking management plan' as strongly encouraged by Policy 11 of the NPSUD 2020, to mitigate against the issues of on-street parking.
    iii) I ask Council to use traffic calming solutions that do not lose on-street car parking spaces. Eg. Speed Humps, instead of Choke Points.
    iv) I ask council to restrict more intensification in the neighbourhoods with narrow and hazardous road access to Standard Residential zoning for road user safety reasons. Eg (But not limited to:-) Mount St, Konini St, Locking St, Locking Tce, Northesk St (East) and Renwick Place.

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.

Received: 30/10/23
Submission: 5912
NDOCS: 5395-70224-18266

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 (Complete details below):

Full Name: Nicola Ouston

Address:

Telephone:

Email: moandnic@xtra.co.nz

Signature of Submitter: N Ouston

Date: 24.10.2023

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 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.
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      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.

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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.

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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.

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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.

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

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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.

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Rec: 31/10/23
Sub No: S 913
Docs: 5395 To 224 - 18265

Rev 0.2a

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: MELANIE SCOTT

Address:

Nelson 7010

Telephone:

Email: mellyshause@xtra.co.nz

Signature of Submitter:

Date: **31st October 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 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.

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    i) I ask the Council to appoint Councillors from either side of the Sept 14th vote.
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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) I am unable to find a section 32 report regarding the winter sunlight shading effects on neighbouring properties. The daylight admission testing in the B&A memorandum dated 15/3/23 are only about maximising building bulk and height to enable increased floor plates at upper levels on a typical size section, rather than any loss of sunlight and the shading effects of a neighbour.

d) Shape Nelson Website provides misleading information on 'How PC29 could affect you' with no mention of completely losing sunlight amenity with possible total shading over the winter months. Quote:- "**Daylight admission -** the maximum allowable building height decreases as the building gets closer to the side and rear boundaries, so that taller buildings leave space for daylight to get to the neighbouring properties".

e) 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.

viii) NCC & TDC 'Housing We'd Choose' report dated June 2021 by M.e Consulting ranks 'Sunny' as the highest preference for housing choice in Nelson and yet PC29 will remove that amenity from its exiting residents, without warning or compensation.

(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 no greater than 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.
   iii) I strongly oppose the Medium and High density plan change in the Tahunanui Hills area (Tosswill, Tamaki etc).

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 a 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.

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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. See attached photo (city area taken up by cars).
    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 without providing off street carparking will result in significant hazards to pedestrians and road users in some areas of Nelson where roads are extremely narrow, with little or no footpaths, no berms, high retaining walls, steep drop offs and no turning spaces. Some of these roads are all much narrower than would be expected under modern standards with some being barely a single vehicle wide.
b) On street parked cars, have also narrowed two-way roads down to single lane for two-way access and forced parking on footpaths to become the 'norm'.
c) Drivers must carefully share the roads with each other, cyclists and pedestrians, frequently having to pause where there is available space to allow vehicles to pass. Sometimes this requires driving over the kerb and onto footpaths.
d) In places trucks, including the weekly waste collection vehicles have to reverse quite long stretches because of the lack of anywhere to turn.

e) In places, visibility of oncoming vehicles is also very poor and dangerous.
f) Driving up and reversing out of very steep driveways is challenging at best and potentially unsafe.
g) Access for pedestrians, mobility scooters, cyclists, refuse collection and Emergency Service vehicles is difficult and unsafe.
h) Intensification, without providing on-site car-parking in these narrow road access areas will cause fracturing of neighbourly relations and communities who live in these areas.
    i) I strongly recommend that the Hearings Panel conduct a thorough site inspection of the narrow streets of Nelson including, (but not limited to) Locking St, Mount St & Konini St, Tosswill Rd, Tamaki St, Chamberlian, including on foot.
    ii) I ask Council to provide a 'Comprehensive car parking management plan' as strongly encouraged by Policy 11 of the NPSUD 2020, to mitigate against the issues of on-street parking.
    iii) I ask Council to use traffic calming solutions that do not lose on-street car parking spaces. Eg. Speed Humps, instead of Choke Points.
    iv) I ask council to restrict more intensification in the neighbourhoods with narrow and hazardous road access to Standard Residential zoning for road user safety reasons. Eg (But not limited to:-) Mount St, Konini St, Locking St, Locking Tce, Northesk St (East) and Renwick Place.

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.
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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.
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Received: 30/10/23
Sub No: S914
NDocs: 5395702224 - 18267

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

Andrew Hume

andyhume@hotmail.com

Date: 29/10/2023

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

I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearings.

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

1) **The Plan Change 29 Process. I want to acknowledge...**
   a) That I have found it difficult to digest the total effect of the proposed PC 29 and its supporting documentation due to its size and complexity.
   b) That access to a paper copy of PC 29 and the Section 32 reports has not been made available for residents who do not have access to, or the ability to use a computer.
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Rec: 31/10/23
Submission: 5915

Rev 0.2a

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: Amanda Leah Haywood

Address:

Nelson 7010

Telephone:

Email: mandyhaywood@hotmail.com.

Signature of Submitter: A Haywood

Date: **31st October 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 PC 29 in its entirety, but if it is not rejected then these are my points...

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   f) The severe lack of Trust between residents and Council has become significant given the following:-
      i) The PC29 submission timeframe was only extended from 27 to 56 working days because of public pressure at 7th Sept public meeting.
      ii) PC29 media engagement was only increased because of public pressure at 7th Sept public meeting.
      iii) Information regarding the negative impacts on existing residents' enjoyment of their properties is not forthcoming in every interaction with NCC members and staff. It is

Mail: 5395 70224 - 18270

'Deceit by Omission' and has required individuals to research PC 29 to find out these aspects and share them with the wider public. Eg.

(1) Loss of winter sunlight with new recession planes.
(2) Loss of on street car parking with increased intensification due to no requirement for on-site car parking.
(3) Loss of privacy with bigger buildings that are closer to boundaries.
(4) Loss of property value with loss of views, sunlight, and privacy.
(5) Increased levels of noise with increased residential dwellings around a boundary.
(6) Residential unit numbers per building can be increased on a 'restricted discretionary' basis without notification or written approval.
(7) Exaggerated population forecasts.
(8) Council voted ***NOT*** to withdraw PC 29 on Sept 14th Meeting.
(9) Predetermined biased Councillors on the hearing panel.
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Rec: 31/10/23
S916

Rev 0.2a

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

NOC: 5395702 24 - 18272

Submitter: Emily Morgan

Full Name: Emily May Morgan

Address:

Nelson 701

Telephone:

Email: just-emily@hotmail.co.nz

Signature of Submitter:

E Morgan

Date: **31st October 2023**

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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 completely out of character and lacks a long-term vision for maintaining the attraction of Nelson for all the future residents and visitors. See attached photo (out of character 1)
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 to that of areas of historic character value from the early settlement years of Nelson and stop future 'out of character' developments.

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Rec: 31/10/23
Sub No: 5917
NDocs: 5395702224-18273

Rev 0.2a

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: claire

Full Name: Elizabeth Woodall

Address:

Nelson 701(

Telephone:

Email: woodallemail@gmail.com

Signature of Submitter: Woodall

Date: **31st October 2023**

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Rec: 31/10/23
Sub No: 5918
NDCS: 539570224 - 18275

Rev 0.2a

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: Michelle Souman.

Full Name: Michelle Ellen Souman.

Address:

Nelson 701

Telephone:

Email: michellesouman1@gmail.com.

Signature of Submitter:

Date: **31st October 2023**

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Rec: 31/10/23
Submission: 519

Rev 0.2a

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: Gary BURNS

Address:

Nelson 7010

Telephone:

Email: gabba@kinect.co.nz

Signature of Submitter:

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8128-4220158855: Page

'Deceit by Omission' and has required individuals to research PC 29 to find out these aspects and share them with the wider public. Eg.

(1) Loss of winter sunlight with new recession planes.
(2) Loss of on street car parking with increased intensification due to no requirement for on-site car parking.
(3) Loss of privacy with bigger buildings that are closer to boundaries.
(4) Loss of property value with loss of views, sunlight, and privacy.
(5) Increased levels of noise with increased residential dwellings around a boundary.
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(7) Exaggerated population forecasts.
(8) Council voted ***NOT*** to withdraw PC 29 on Sept 14th Meeting.
(9) Predetermined biased Councillors on the hearing panel.
    (a) I am asking Council to immediately withdraw PC 29 and get Council Planning staff to refine the plan design and then put it back out for public consultation.

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.
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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 **'home grown'** projections that require the scale of intensification to be greater than those of Statistics NZ. I refer to the submission by Demographer, Dr Geoffrey Hayes.
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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.
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   ii) I ask Council to apply no greater than 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.
   iii) I strongly oppose the Medium and High density plan change in the Tahunanui Hills area (Tosswill, Tamaki etc).

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.

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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.
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10) On-street carparking

a) Increased intensification without providing off street carparking will result in significant hazards to pedestrians and road users in some areas of Nelson where roads are extremely narrow, with little or no footpaths, no berms, high retaining walls, steep drop offs and no turning spaces. Some of these roads are all much narrower than would be expected under modern standards with some being barely a single vehicle wide.
b) On street parked cars, have also narrowed two-way roads down to single lane for two-way access and forced parking on footpaths to become the 'norm'.
c) Drivers must carefully share the roads with each other, cyclists and pedestrians, frequently having to pause where there is available space to allow vehicles to pass. Sometimes this requires driving over the kerb and onto footpaths.
d) In places trucks, including the weekly waste collection vehicles have to reverse quite long stretches because of the lack of anywhere to turn.

e) In places, visibility of oncoming vehicles is also very poor and dangerous.
f) Driving up and reversing out of very steep driveways is challenging at best and potentially unsafe.
g) Access for pedestrians, mobility scooters, cyclists, refuse collection and Emergency Service vehicles is difficult and unsafe.
h) Intensification, without providing on-site car-parking in these narrow road access areas will cause fracturing of neighbourly relations and communities who live in these areas.
    i) I strongly recommend that the Hearings Panel conduct a thorough site inspection of the narrow streets of Nelson including, (but not limited to) Locking St, Mount St & Konini St, Tosswill Rd, Tamaki St, Chamberlian, including on foot.
    ii) I ask Council to provide a 'Comprehensive car parking management plan' as strongly encouraged by Policy 11 of the NPSUD 2020, to mitigate against the issues of on-street parking.
    iii) I ask Council to use traffic calming solutions that do not lose on-street car parking spaces. Eg. Speed Humps, instead of Choke Points.
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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.
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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.

Rec: 31/10/23
Sub No: 5920
NDocs: 5395702Z4 - 18279

Rev 0.2a

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: Pauline Miller

Full Name: **Pauline Miller**

Address: [redacted]

Nelson 7010

Telephone: [redacted]

Email: **millersonmill@outlook.com**

Signature of Submitter: [signature]

Date: **29th October 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, however I hope it holds as much weight as those who do.

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 totally unacceptable and stressful.
   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 in its entirety, so they can formulate and articulate a suitable response.
   d) The severe lack of Trust between residents and Council has become significant given the following:-
      i) The PC29 submission timeframe was only extended from 27 to 56 working days because of public pressure at 7th Sept public meeting.
      ii) PC29 media engagement was only increased because of public pressure at 7th Sept public meeting.
      iii) Information regarding the negative impacts on existing residents' enjoyment of their properties is not forthcoming in every interaction with NCC members and staff. It is **'Deceit by Omission'** and has required individuals to research PC 29 to find out these aspects and share them with the wider public. Eg.
         (1) Loss of winter sunlight with new recession planes.

(2) Loss of on street car parking with increased intensification due to no requirement for on-site car parking.
(3) Loss of privacy with bigger buildings that are closer to boundaries.
(4) Loss of property value with loss of views, sunlight, and privacy.
(5) Increased levels of noise with increased residential dwellings around a boundary.
(6) Residential unit numbers per building can be increased on a 'restricted discretionary' basis without notification or written approval.
(7) Exaggerated population forecasts.
(8) Council voted ***NOT*** to withdraw PC 29 on Sept 14th Meeting.
(9) Predetermined biased Councillors on the hearing panel.
    (a) I am asking Council to immediately withdraw PC 29 and get Council Planning staff to refine the plan design and then put it back out for public consultation.

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.
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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 **'home grown'** projections that require the scale of intensification to be greater than those of Statistics NZ. I refer to the submission by Demographer, Dr Geoffrey Hayes.
b) When challenged, NCC staff and the Mayor, always refer to the wider Nelson-Tasman regional growth, which is beyond the scope of PC29.
    i) I ask the Council to use Statistics NZ medium projection forecasts for Nelson, 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 it has 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 completely out of character and lacks a 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 to that of areas of historic character value from the early settlement years of Nelson and stop future 'out of character' developments.

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a) Sunlight is a ***CRITICAL*** part of living in Nelson. It is not called the 'Sunshine Capital of NZ' for nothing. It is well documented that people relocate to Nelson because of the Sun and accept reduced wages called 'Sunshine Wages' for that privilege.

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) I am unable to find a section 32 report regarding the winter sunlight shading effects on neighbouring properties. The daylight admission testing in the B&A memorandum dated 15/3/23 are only about maximising building bulk and height to enable increased floor plates at upper levels on a typical size section, rather than any loss of sunlight and the shading effects of a neighbour.

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e) 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.

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viii) NCC & TDC 'Housing We'd Choose' report dated June 2021 by M.e Consulting ranks 'Sunny' as the highest preference for housing choice in Nelson and yet PC29 will remove that amenity from its exiting residents, without warning or compensation.

(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'.

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i) See attached photos (Mt St 1-6 and Konini St 1 & 2)

   i) I strongly recommend that the Hearings Panel conduct a thorough site inspection of the narrow streets of Nelson including, (but not limited to) Locking St, Mount St & Konini St, including on foot.

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Rec: 31/10/23
Submission: 5921

Rev 0.2a

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: Saskia Roeske-Wout

Address:

Nelson 70

Telephone

Email: saskiaroeske@gmail.com

Signature of Submitter:

Date: **31st October 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 PC 29 in its entirety, but if it is not rejected then these are my points...

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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, very time consuming 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 in its entirety, so they can formulate and articulate a suitable response.
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Docs: 5895702224-18283

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c) Drivers must carefully share the roads with each other, cyclists and pedestrians, frequently having to pause where there is available space to allow vehicles to pass. Sometimes this requires driving over the kerb and onto footpaths.
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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.

Rec: 31/10/23
Sub No: 5922
NDocs: 5395702 24 -
18282

Rev 0.2a

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: Rick Miller

Full Name: **Rick Miller**

Address:

Nelson 7010

Telephone:

Email: **millersonmill@outlook.com**

Signature of Submitter:

Date: **29th October 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, however I hope it holds as much weight as those who do.

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 totally unacceptable and stressful.
   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 in its entirety, so they can formulate and articulate a suitable response.
   d) The severe lack of Trust between residents and Council has become significant given the following:-
      i) The PC29 submission timeframe was only extended from 27 to 56 working days because of public pressure at 7th Sept public meeting.
      ii) PC29 media engagement was only increased because of public pressure at 7th Sept public meeting.
      iii) Information regarding the negative impacts on existing residents' enjoyment of their properties is not forthcoming in every interaction with NCC members and staff. It is **'Deceit by Omission'** and has required individuals to research PC 29 to find out these aspects and share them with the wider public. Eg.
         (1) Loss of winter sunlight with new recession planes.

(2) Loss of on street car parking with increased intensification due to no requirement for on-site car parking.
(3) Loss of privacy with bigger buildings that are closer to boundaries.
(4) Loss of property value with loss of views, sunlight, and privacy.
(5) Increased levels of noise with increased residential dwellings around a boundary.
(6) Residential unit numbers per building can be increased on a 'restricted discretionary' basis without notification or written approval.
(7) Exaggerated population forecasts.
(8) Council voted ***NOT*** to withdraw PC 29 on Sept 14th Meeting.
(9) Predetermined biased Councillors on the hearing panel.
    (a) I am asking Council to immediately withdraw PC 29 and get Council Planning staff to refine the plan design and then put it back out for public consultation.

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.
    ii) If i) is not followed then I ask that all Councillors are replaced with independent Commissioners.

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 **'home grown'** projections that require the scale of intensification to be greater than those of Statistics NZ. I refer to the submission by Demographer, Dr Geoffrey Hayes.
b) When challenged, NCC staff and the Mayor, always refer to the wider Nelson-Tasman regional growth, which is beyond the scope of PC29.
    i) I ask the Council to use Statistics NZ medium projection forecasts for Nelson, 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 it has 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 completely out of character and lacks a 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 to that of areas of historic character value from the early settlement years of Nelson and stop future 'out of character' developments.

ii) I ask the Council to appoint an Urban Development Agency (UDA), as per the Nelson Tasman 2050 proposal, 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 nothing. It is well documented that people relocate to Nelson because of the Sun and accept reduced wages called 'Sunshine Wages' for that privilege.

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c) I am unable to find a section 32 report regarding the winter sunlight shading effects on neighbouring properties. The daylight admission testing in the B&A memorandum dated 15/3/23 are only about maximising building bulk and height to enable increased floor plates at upper levels on a typical size section, rather than any loss of sunlight and the shading effects of a neighbour.

d) Shape Nelson Website provides misleading information on 'How PC29 could affect you' with no mention of completely losing sunlight amenity with possible total shading over the winter months. Quote:- "**Daylight admission** - the maximum allowable building height decreases as the building gets closer to the side and rear boundaries, so that taller buildings leave space for daylight to get to the neighbouring properties".

e) 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.

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

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

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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.

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Rec: 31/10/23
Sub No: S923
NDOCS-539570224-18285

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 (Complete details below):

Full Name: Tyler Heni

Address:

Telephone:

Email: Tylerheni@hotmail.com

Signature of Submitter:

Date:
28/10/23

Delete as applicable: -

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

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   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.
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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.
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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.
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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.

Rec. 31/10/23
Submission: 924

Rev 0.2a

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: Shirley Ann Burns.

Address:

Nelson 7010

Telephone:

Email: g.s.burns@kinect.co.nz.

Signature of Submitter:

Date: **31st October 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 PC 29 in its entirety, but if it is not rejected then these are my points...

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

a) That I have found it difficult to digest the total effect of the proposed PC 29 and its supporting documentation due to its size and complexity.
b) That access to a paper copy of PC 29 and the Section 32 reports has not been made available for residents who do not have access to, or the ability to use a computer.
c) That I have found PC 29 lack of early public engagement and consultation by Council, with its severe implications towards the well-being of existing rate paying residents enjoyment of their properties, extremely stressful, very time consuming 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 in its entirety, so they can formulate and articulate a suitable response.
f) The severe lack of Trust between residents and Council has become significant given the following:-
    i) The PC29 submission timeframe was only extended from 27 to 56 working days because of public pressure at 7th Sept public meeting.
    ii) PC29 media engagement was only increased because of public pressure at 7th Sept public meeting.
    iii) Information regarding the negative impacts on existing residents' enjoyment of their properties is not forthcoming in every interaction with NCC members and staff. It is

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'Deceit by Omission' and has required individuals to research PC 29 to find out these aspects and share them with the wider public. Eg.

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

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.
    ii) If i) is not followed then I ask that all Councillors are replaced with independent Commissioners.

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 **'home grown'** projections that require the scale of intensification to be greater than those of Statistics NZ. I refer to the submission by Demographer, Dr Geoffrey Hayes.
b) When challenged, NCC staff and the Mayor, always refer to the wider Nelson-Tasman regional growth, which is beyond the scope of PC29.
    i) I ask the Council to use Statistics NZ medium projection forecasts for Nelson, 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 completely out of character and lacks a long-term vision for maintaining the attraction of Nelson for all the future residents and visitors. See attached photo (out of character 1)
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 to that of areas of historic character value from the early settlement years of Nelson and stop future 'out of character' developments.

ii) I ask the Council to appoint an Urban Development Agency (UDA), as per the Nelson Tasman 2050 proposal, (attached) 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) I am unable to find a section 32 report regarding the winter sunlight shading effects on neighbouring properties. The daylight admission testing in the B&A memorandum dated 15/3/23 are only about maximising building bulk and height to enable increased floor plates at upper levels on a typical size section, rather than any loss of sunlight and the shading effects of a neighbour.

d) Shape Nelson Website provides misleading information on 'How PC29 could affect you' with no mention of completely losing sunlight amenity with possible total shading over the winter months. Quote:- "**Daylight admission** - the maximum allowable building height decreases as the building gets closer to the side and rear boundaries, so that taller buildings leave space for daylight to get to the neighbouring properties".

e) 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.

viii) NCC & TDC 'Housing We'd Choose' report dated June 2021 by M.e Consulting ranks 'Sunny' as the highest preference for housing choice in Nelson and yet PC29 will remove that amenity from its exiting residents, without warning or compensation.

(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 no greater than 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.
   iii) I strongly oppose the Medium and High density plan change in the Tahunanui Hills area (Tosswill, Tamaki etc).

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 a valuable housing resource. Eg Rocks & Haven Road has many empty apartments.
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    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. See attached photo (city area taken up by cars).
    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'.
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10) On-street carparking

a) Increased intensification without providing off street carparking will result in significant hazards to pedestrians and road users in some areas of Nelson where roads are extremely narrow, with little or no footpaths, no berms, high retaining walls, steep drop offs and no turning spaces. Some of these roads are all much narrower than would be expected under modern standards with some being barely a single vehicle wide.
b) On street parked cars, have also narrowed two-way roads down to single lane for two-way access and forced parking on footpaths to become the 'norm'.
c) Drivers must carefully share the roads with each other, cyclists and pedestrians, frequently having to pause where there is available space to allow vehicles to pass. Sometimes this requires driving over the kerb and onto footpaths.
d) In places trucks, including the weekly waste collection vehicles have to reverse quite long stretches because of the lack of anywhere to turn.

e) In places, visibility of oncoming vehicles is also very poor and dangerous.
f) Driving up and reversing out of very steep driveways is challenging at best and potentially unsafe.
g) Access for pedestrians, mobility scooters, cyclists, refuse collection and Emergency Service vehicles is difficult and unsafe.
h) Intensification, without providing on-site car-parking in these narrow road access areas will cause fracturing of neighbourly relations and communities who live in these areas.
    i) I strongly recommend that the Hearings Panel conduct a thorough site inspection of the narrow streets of Nelson including, (but not limited to) Locking St, Mount St & Konini St, Tosswill Rd, Tamaki St, Chamberlian, including on foot.
    ii) I ask Council to provide a 'Comprehensive car parking management plan' as strongly encouraged by Policy 11 of the NPSUD 2020, to mitigate against the issues of on-street parking.
    iii) I ask Council to use traffic calming solutions that do not lose on-street car parking spaces. Eg. Speed Humps, instead of Choke Points.
    iv) I ask council to restrict more intensification in the neighbourhoods with narrow and hazardous road access to Standard Residential zoning for road user safety reasons. Eg (But not limited to:-) Mount St, Konini St, Locking St, Locking Tce, Northesk St (East) and Renwick Place.

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b) High density living for the homeless and vulnerable will not result in healthy outcomes for all concerned.
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Rec: 31/10/23
Submission: 5925

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

NOCC: 5895702224-18292.

Submitter (Complete details below):

Full Name: Nicole Lee GIBSON

Address: [redacted]

Telephone:

Email: colie225@gmail.com

Signature of Submitter: [signature]

Date: 27 october 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...

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Nicole GIBSON

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Nicole Gibson

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Nicole Gibson

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Rec: 31/10/23
Sub No: SQ26
NDocs: 539570 226-18290

Rev 0.1

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

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PO Box 645
Nelson 7040
Environmental.planning@ncc.govt.nz

Submitter (Complete details below):

Full Name: Nathan Gibson

Address:

Telephone:

Email: Nathan.gibson95@gmail.com

Signature of Submitter: NGibson

Date: 30/10/23

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Rec: 31/10/23
Submission: 5927

Rev 0.1

MDCS: 539570224-18294

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: Matthew Gibson

Address:

Telephone:

Email: matgibson@hotmail.co.nz

Signature of Submitter: MG

Date: 27/10/23

Delete as applicable: -

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Rec: 31/10/23
Sub No: S928
NDocs: 5395702 - 18293

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 (Complete details below):

Full Name: Kade Smith

Address:

Telephone:

Email: kadesmithy5@hotmail.com

Signature of Submitter: KSmith

Date: 30/10/23

Delete as applicable: -

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Rec: 31/10/23
Sub No: 592a
NDCS: 5395702Z4-18297

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 (Complete details below):

Full Name: Nichola Rose Farrell Tyree

Address:

Telephone

Email: nichola.tyree@gmail.com

Signature of Submitter: Nichola Tyree

Date: 30/10/23

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.

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      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.

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Received: 25/9/23
SUBMISSION: 5930
NDOCS: 5395702Z4-18307

22 September, 2023

STOKE. 7011

The Chairperson,
Resource Planning – 29
Nelson City Council.
NELSON.

I object to the plan for intensified and social housing for the Stoke area.

The vast majority who reside in this area are pensioners. They choose to live there because they want peaceful, safe living, close to the amenities it offers, catering for the elderly.

Scooters, skate boards and souped-up cars do not mix well with zimmer frames, wheelchairs and frail elderly folk who deserve to feel safe in their living environment.

I urge you to seriously reconsider that the site on 81 Neale Ave be re- allocated to housing for the elderly.

Please give this your serious consideration.

Dorothy Griffiths

Dorothy Griffiths
dottie.nz@gmail.com.

Received: 20/09/2023
Sub#: 5931
NDocs: 5395102224-18309

The Chairperson,

Shape Nelson .
City Council,
Nelson.

Submission – Plan Change 29 - Neale Ave Proposition

I am an elderly resident who purposely downsized to a property in Neale Ave Stoke. It was chosen for it safe, quiet, and close proximity to amenities and bus routes area. The majority of residents in this area are pensioners and young families.

My concerns about crowding social housing into this prime real estate site in Neale Ave would render this area less safe for the majority of these residents.

My fear is that I am being forced into a gated retirement village where I would loose the independence I strive to maintain.

Please consider that the site be used to house the elderly and young families

Thankyou for giving this submission your consideration.

Norma M. Affleck.

Norma Affleck

STOKE.
nmaffleck@gmail.com

Received: 31/10/23
Time: 4.03pm
Sub No: S932
NDOCS-539570224-18314

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 (Complete details below):

Full Name Belinda Pooley

Address:

Telephone:

Email: belindapooley665@gmail.com

Signature of Submitter: B.pooley

Date: 31/10/2023

Delete as applicable: -

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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.

8) 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.

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.
   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.

Received: 31/10/23
Time: 4.04pm
Sub No: S933
NDOCS-539570224-18316

Kāinga Ora
Homes and Communities

31 October 2023

Attn: Environmental Planning
Nelson City Council
PO Box 645
NELSON 7040
Submission by email via: environmental.planning@ncc.govt.nz

KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON PLAN CHANGE 29 OF THE NELSON RESOURCE MANAGEMENT PLAN

This is a submission by Kāinga Ora - Homes and Communities on Plan Change 29 ("PC29") from Nelson City Council ("the Council" or "NCC") on the Nelson Resource Management Plan ("the Plan" or "NRMP"):

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

The specific provisions of the proposal that this submission relates to:

The proposed Plan Change 29 in its entirety.

The Kāinga Ora submission is:

1. Kāinga Ora Homes and Communities ("Kāinga Ora") is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:

   a) Provide people with good quality, affordable housing choices that meet diverse needs; and

b) Support good access to jobs, amenities and services; and

c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.

2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across Nelson and wider top-of-the South region.

3. Kāinga Ora therefore has an interest in Plan Change 29 to the Nelson Resource Management Plan and how it:

i. Gives effect to the National Policy Statement on Urban Development ("**NPS-UD**");

ii. Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental, and market housing; and

iii. Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.

4. Kāinga Ora is generally supportive of PC29 and especially to the extent that the Plan Change is more enabling of residential development within the residential and business zones. Amendments are sought on specific matters, which are summarised further below.

5. In particular, Kāinga Ora supports:

a) The recognition of the need for well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 ("NPS-UD");

b) The provision of medium density and high density housing in a large portion of the existing residential areas across the city;

c) The recognition of the need to provide sufficient development capacity to meet long term demands for housing;

d) The introduction of a papakāinga chapter which promotes the enablement of papakāinga in urban environments;

e) The need to manage significant risks from natural hazards;

f) The promotion of a compact urban form and residential intensification in Nelson City; and

g) The provision for enabling medium to high density residential development within a walkable catchment of the City Centre and larger Commercial Centres.

6. The Kāinga Ora submission seeks amendments to PC29 in the following topic areas:

i. Volume 1 – General – Chapter 2 - Meanings of words – Small changes are sought, including a new definition for Community Gardens and Minor Alterations.

ii. Volume 1 – General – Chapter 3 Administration – Changes are sought, as they pertain to the use of design guidance and recommendation for this to sit outside the Plan.

iii. Volume 1 – General – Chapter 5 District wide Objectives and policies – Small administrative changes are sought, alongside a more consequential change to the Plan management of natural hazards.

Kāinga Ora supports a risk-based approach to the management of natural hazards, however, opposes the inclusion of flood hazard overlays within the map as part of the District Plan hazards. Kāinga Ora requests that these maps sit outside the plan in non-statutory GIS layers – these requested changes to mapping are sought throughout the plan change within all relevant rules that refer to these overlays.

iv. Volume 2 – Zones – Noise – State Highways
Kāinga Ora Kāinga Ora recognises the importance of managing adverse noise effects and ensuring living environments are healthy and pleasant. However, the current rule framework is not supported and changes are sought.
Kāinga Ora opposes a rule framework which is based on a standardised corridor approach and supports a modelled noise contour.

v. Volume 2 – Zones – Residential Zones – the notified provisions are generally supported, with amendments sought in relation to the following:

a) Inclusion of non-notification clauses, changes to activity status to provide for a more enabling framework and the removal of the requirement to provide for wheelchair accessible units when providing 10+ units.

b) Kāinga Ora does not support the proposed 8m height restriction pertaining to buildings adjoining a historic heritage precinct or scheduled building. The scope of discretion in regard to the effect on historic heritage values is too broad and would likely lead to undue consenting burdens in the application of this rule. Applying a blanket 8m height limit is a blunt tool for protecting heritage values.

c) High Density Residential Zone (HDRZ) – Increase height limits from 19.5m to 22m to allow for design flexibility and achieve a 6 storey building. Kāinga Ora also seeks a change to the height in relation to boundary plane to truly provide for 6 storey buildings within the HDRZ.

vi. Volume 2 – Zones – Chapter 8 Inner City Zone - The notified provisions are generally supported, with amendments sought in relation to the following:

a) Allowing residential dwellings on ground floor where not facing the street frontage and providing a focus for passive surveillance over public spaces and the street.

b) Removing some matters of discretion which are considered ambiguous.

vii. Volume 2 – Zones – Suburban Commercial Zone - The notified provisions are generally supported, with amendments sought in relation to the following:

a) Allowing residential dwellings on ground floor where not facing the street frontage and providing a focus for passive surveillance over public spaces and the street.

viii. Volume 2 – Zones – Industrial Zone - The notified provisions are generally supported, with amendments sought in relation to the following:

a) Change of activity status to provide for a more enabling rule framework.

ix. Volume 3 – Appendices

a) Acoustic insulation – Kāinga Ora consider that the appendix should be updated to provide alternative and new acoustic solutions.

x. Any consequential changes necessary to give effect to the changes highlighted above or in Appendix 1 attached.

7. The changes requested are made to:

i. Ensure that Kāinga Ora can carry out its statutory obligations;

ii. Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;

iii. Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;

iv. Provide clarity for all plan users; and

v. Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.

8. The Kāinga Ora submission points and changes sought can be found within Table 1 of **Appendix 1** which forms the bulk of the submission.

Kāinga Ora seeks the following decision from NCC:

That the specific amendments, additions or retentions which are sought as specifically outlined in **Appendix 1**, shown in red and are struck through or underlined, are accepted and adopted into the Nelson Resource Management Plan, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Kāinga Ora wishes to be heard in support of their submission.

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its submission on the Plan Change to the Nelson Resource Management Plan to address the matters raised in its submission.

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Brendon Liggett
Development Planning Manager

Kāinga Ora – Homes and Communities

ADDRESS FOR SERVICE: *Kāinga Ora – Homes and Communities, PO Box 74598, Greenlane, Auckland 1051. Email: developmentplanning@kaingaora.govt.nz*

Appendix 1: Decisions sought Nelson City – Plan Change 29 to the Nelson Resource Management Plan

The following table sets out the amendments sought to Plan Change 29 to the Nelson Resource Management Plan and also identifies those provisions that Kāinga Ora supports.

Proposed changes are shown as ~~strikethrough~~ for deletion and underlined for proposed additional text.

Kāinga Ora
Homes and Communities

Table 1

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
OVERALL PLAN – SUBMISSION ACROSS WHOLE PLAN CHANGE					
1.	Whole of plan		Oppose in part	Kāinga Ora supports a risk-based approach to the management of natural hazards, however, opposes the inclusion of flood hazard overlays within the map as part of the District Plan hazards. Kāinga Ora requests that these maps sit outside the plan in non-statutory GIS layers – these requested changes to mapping are sought throughout the plan change within all relevant rules that refer to these overlays. The Auckland Unitary Plan ("AUP") adopts a set of non-statutory flood hazard overlay maps which operate as interactive maps on the Council's 'Geo Maps' website – a separate mapping viewer to the statutory maps. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and overlay maps which operate as interactive maps on the Council's 'Geo Maps' website – a separate mapping viewer to the statutory maps.	*Amendments sought.* 1. *Remove the proposed natural hazard flooding overlay(s) from the Planning Maps, and instead hold this information in non-statutory GIS maps* 2. *Amend definitions to account for this by continuing to identify relevant flood hazards, but not linking these to flood hazard overlays within the District Plan maps* 3. *Consequential changes to give effect to this submission*
VOLUME 1 – GENERAL – CHAPTER 2 MEANING OF WORDS					
2.	Definitions	NEW DEFINITION Community Garden		Kāinga Ora seeks a new definition relating to Community Gardens, to enable a related permitted activity rule to be introduced in the residential and commercial zones. Community gardens provide valuable social infrastructure, particularly in intensifying urban environments.	*Insert new definition:* *means land used as a garden operated by a group or collective for the purpose of growing plants, vegetables or fruit on a not for profit basis and excludes any retail activity.*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
3.	Definitions	NEW DEFINITION Minor Alteration		Kāinga Ora seeks a new definition relating to Minor Alterations, to provide certainty for rules within the plan that include minor alterations to buildings within the Inner-City Zone.	*Insert new definition:* *Minor alteration: means non-consequential alterations to the appearance of the building, where the alteration does not result in a notable change to the design, form or quality of material in which the building at present and, alterations that do not result in additional impacts on a neighbouring property, street or public open space, and change that does not result in an increase of height, or change that does not increase floorspace by more than 10%*
4.	Definitions	Design Statement	Support in part	Kāinga Ora recognises that good quality design is important to achieve quality living environments and a well-functioning urban environment. However, amendment is sought to remove the requirement that the design statement must be from an "urban design expert".	*Amendments sought* *Is a requirement of Appendix 14 and is a statement from a suitably qualified and experienced ~~urban design~~ expert that explains the design principles and concepts that have informed the subdivision or development design, and how urban design and sustainability issues have been dealt with.*
5.	Definitions	Natural Hazard Overlay	Support in part	Kāinga Ora supports a risk-based approach to the management of natural hazards, however, opposes the inclusion of flood hazard overlays within the map as part of the District Plan.	*Amendments as follows:* *Means one or more of the following overlays shown on the Planning Maps: Fault Hazard Overlay, Fault Deformation Overlay, Fault Awareness Overlay, Liquefaction Hazard Overlay, Slope Instability Area 1 Overlay, Slope Instability Area 2 Overlay, Slope Instability Area 3 Overlay, Slope Instability Debris Run-out Area Overlay~~, Flood Overlays (Flood Overlay, Flood Path Overlay, and Inundation Overlay)~~*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					~~*Flood Hazard Overlay, High Flood Hazard Overlay and Floodway.*~~
VOLUME 1 – GENERAL – CHAPTER 3 ADMINSTRATION					
6.	AD10 Relevant Documents	AD10.2.i Design Guides		Kāinga Ora opposes the inclusion of Design Guidelines in the Plan, which act as de facto rules to be complied with. Kāinga Ora opposes any policy or rule approach which would require development proposals to comply with such design guidelines in the District Plan. Kāinga Ora alternatively seeks and supports design guidelines sit outside the Plan as guidance regarding best practice design outcomes. The Design Guidelines should be treated as a non-statutory tool. If there is content of a Design Guideline that Council wants in the Plan, Kāinga Ora seeks that these are relocated within a specific rule, matter of discretion or assessment criterion. Where particular design outcomes are to be achieved, these should be specified in matters of discretion or assessment.	1. *Kāinga Ora seeks the Design Guidelines are removed from within the District Plan and are treated as non-statutory tool, outside of the District Plan.* 2. *Delete all references to the Design Guidelines and in any requirement to meet or follow the Design Guidelines in the provisions of the Plan.* 3. *Where particular design outcomes are to be achieved, these should be specifically stated in policies and matters of discretion. Specific examples are illustrated and sought in this submission.* 4. *If the relief sought in this submission point is not granted, in deleting the design guidelines and references to such guidelines in the District Plan,* *Kāinga Ora seeks that the design guidelines are amended, simplified, and written in a manner that is easy to follow. The outcomes sought in the guidelines should read as desired requirements with sufficient flexibility to provide for a design that fits and works on site, rather than rules that a consent holder must follow and adhere to. Otherwise, there is no flexibility and scope to create a design that fits with specific site*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					characteristics and desired built form development. 5. *If the relief sought in this submission point is not granted, Kāinga Ora seeks the opportunity to review these guidelines if they are to remain a statutory document.* 6. *Kāinga Ora seeks the opportunity to review these guidelines if they are to remain a statutory document.*
VOLUME 1 – GENERAL – CHAPTER 5 DISTRICT WIDE OBJECTIVES AND POLICIES					
7.	DO1 Tangata Whenua	All new provisions	Support	Kāinga Ora supports the proposed provisions within this section.	*Retain as notified*
8.	DO1A Papakāinga in the GRZ, MRZ, HRZ, Inner City...	All new provisions	Support	Kāinga Ora supports the proposed provisions within this section.	*Retain as notified*
9.	DO2 Natural Hazards	Policy DO2.2.3	Oppose	As submitted earlier, Kāinga Ora does not support the provision of flood hazards and overlays within planning maps and supports such overlays to sit outside of the District Plan in a non-statutory layer to reflect the dynamic nature of such hazards. This policy directly reflects the problematic nature of including flood layers within planning maps. Including old layers within the plan whilst modelling is updated will require a further plan change to adopt new layers and delete the historic layers.	*Delete policy in its entirety:* ~~*Retain historical observed flood overlays (Inundation, Flood and Flood Paths) within the Plan in areas not covered by the 1% AEP flood modelling until further modelling is completed.*~~
10.	DO2 Natural Hazards	Policy DO2.2.4	Support in part	Kāinga Ora consider that subclause 6 is in direct conflict with sub clause 7. Kāinga Ora consider that building platforms	*Amend subclause 6 of this policy as follows:*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				could be located within flood paths if mitigated through higher floor levels to allow for continued flow of water where the risk is not high.	*6. building platforms are not located within land identified in the High Flood Hazard, or where located within the Floodways, or Flood Paths are provided within appropriate mitigation to not exacerbate flood effects;*
11.	DO10 Land Transport	Policy DO10.1.7 Pedestrian, micromobility and bicycle traffic	Support	Kāinga Ora support the promotion of alternative transport options and mode shift.	*Retain the policy as notified*
12.	DO13A Urban Design	Policy DO13A.1.1 Local context and environment	Oppose in part	Whilst Kāinga Ora support the use of urban design features that support the local context, Kāinga Ora consider the policy too restrictive.	*Amend policy as follows:* *Subdivision and development should relate to local topography, climate, heritage, culture, and locally distinctive materials and vegetation where possible, while being future-focussed and accommodating the planned built character of the zone.*
VOLUME 2 – ZONES – CHAPTER 7 RESIDENTIAL ZONE					
13.	7 Residential	REd Description REd.1, REd.3, REd.6, REd.9, REd.10, REd.11	Support in part	Kāinga Ora generally supports the proposed additional paragraphs within this section. Specifically, it is noted that the additions recognise that changes to the existing built urban form will occur as density increases in response to the planned urban environment.	*Amend wording in REd.10 to incorporate deletion -* ***...In achieving the planned urban character of the zone, development will have regard to the amenity values of existing residential sites, acknowledging that this is more challenging as the density of development increases*** *New development will support the anticipated changes to the amenity values of existing residential sites.*
14.	7 Residential	Policy RE1.2 Flexibility in Development	Support in Part	Kainga Ora supports the policy, but considers the need for a 'high' standard of on and off site amenity a difficult benchmark to achieve. Kāinga Ora also consider that a	1. *Include a definition for 'building sketch plans'.* 2. *Amend RE1.2b as follows: presents an acceptable ~~high~~ standard of on site and off site amenity.*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				definition for 'building sketch plans' is included within the definitions.	
15.	7 Residential	Policy RE1.2A.iv Residential – Comprehensive Area	Oppose	Kainga Ora consider this is not a policy and is best translated within the rules.	*Delete policy.*
16.	7 Residential	Policy RE2.9 Quality Living Environment for residents	Support in part	Kāinga Ora supports the need for quality urban environments but considers that high quality is a difficult and subjective threshold to achieve.	*Amend Policy as follows:* *Enable development of existing or new sites to create* ***an acceptable*** ~~***high***~~ *standard of amenity for residents within and adjoining a development.*
17.	7 Residential REr Rules	REr.[new rule – all residential zones]	-	Kāinga Ora seeks the introduction of a new Permitted Activity rule for Community Gardens, which are considered to contribute to a well-functioning urban environment	*Insert new Permitted Activity Rule:* *Community Gardens*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
18.	7 Residential REr Rules all zones	REr.43A State Highway Noise – Acoustic Insulation	Oppose	Kāinga Ora recognises the importance of managing adverse noise effects and ensuring living environments are healthy and pleasant. However, the current rule framework is not supported and changes are sought. Kāinga Ora opposes a rule framework which is based on a standardised corridor approach and supports a modelled noise contour. Kāinga Ora notes that some of the permitted conditions requires fence treatment that would contravene zone based fence rules. Kāinga Ora considers that mechanical ventilation requirements should also allow for alternative design can be proposed by a suitably qualified and experienced HVAC expert. Kāinga Ora opposes matters of discretion which includes vibration considerations within an acoustic focused rule framework.	*Amendments sought* 1. *Delete all provisions, being objectives, policies and rules.* *or alternatively consider:* a) *Amend rule framework so it is based off modelled noise contours and an associated overlay.* b) *Amend mechanical ventilation standards to allow for alternative design.* c) *Remove vibration from matters of discretion.* d) *Remove inconsistencies between this rule and zone based fence standards.* e) *Amend activity status to restricted discretionary.*
19.	7 Residential REr Rules Relating to Overlays on Planning Maps	REr.82 Flood Path, Floodway	Oppose in part	Amend rules as per plan wide recommendations for addressing hazard overlays and delete no-longer relevant rules.	*Amend as per district plan wide recommendations.*
20.	7 Residential REr Rules Relating to Overlays on Planning Maps	REr.83A-REr.83F Flood Areas except Flood Paths or Floodways	Oppose in part	Amend rules as per plan wide recommendations for addressing hazard overlays and delete no-longer relevant rules.	*Amend as per district plan wide recommendations.*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
21.	7 Residential REr Subdivision Rules Relating Overlays on Planning Maps	REr.107	Support in part	Kāinga Ora consider that REr.107 is overly complex and consider that some standards could either be split from the rule. Kāinga Ora oppose minimum allotment sizes for sites within the medium and high density zones and consider a shape factor of 8m x 15m is appropriate. Kāinga Ora also support the introduction of a rule to provide for subdivision around an approved building.	*Amendments a follows:* 1. *Separate out complex standards from rule into separate rules.* 2. *Remove minimum allotment sizes for medium and high density zones and provide for 8m x 15m minimum shape factors only.* 3. *Include rule for subdivision around approved buildings (or in conjunction with a landuse consent).*
22.	7 Residential REr Subdivision Rules Relating Overlays on Planning Maps	REr.110B	Oppose in part	Kāinga Ora consider that subdivision within the Liquefaction Hazard Overlay can be adequately managed through site specific foundation design as opposed to restrictions on subdivision.	*Amend rule to a controlled activity from restricted discretionary with matter of control focused on foundation and network utility design.*
23.	7 Residential REr Subdivision Rules Relating Overlays on Planning Maps	REr.113	Oppose in part	Kāinga Ora considers that subdivision within the heritage precincts is better managed as a restricted discretionary activity.	*Amend activity status of rule from discretionary to restricted discretionary.*
24.	7 Residential REr Subdivision Rules Relating Overlays on Planning Maps	REr.114	Oppose in part	Kāinga Ora considers that subdivision within the heritage overlays is better managed as a restricted discretionary activity.	*Amend activity status of rule from discretionary to restricted discretionary.*
25.	7 Residential REr General Residential Zone (GRZ)	REr.17A Residential Activity	Support in part	Kāinga Ora supports the intent of this rule but seeks that the activity status is reclassified to Restricted Discretionary for non-compliance with either clause. The assessment criteria identify sufficiently specific matters for consideration and placement of conditions.	*Reclassify activity status from Discretionary and Non-Complying to Restricted Discretionary Activity*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
26.	7 Residential REr GRZ	REr.17B Residential Units	Support in part	Kāinga Ora supports the permitted rule (REr.17B1) enabling up to 3 units. However, amendment is sought as compliance is concurrently tied to complying with all conditions in the "rule table". This proviso is unnecessary as compliance with each condition is separately managed through other rules. Kāinga Ora supports the Restricted Discretionary activity status (REr.17B.3) where 4 or more units are proposed, subject to meeting accessibility conditions. Kāinga Ora supports the notification preclusion that applies to REr.17B.3. Kāinga Ora does not support the requirement to include 10% wheelchair accessible units where 10+ units are provided for within REr.17B.4. Kāinga Ora consider this requirement as too restrictive if not a desired option for that specific development and adds additional cost and reduction in space. Kāinga Ora consider that this design aspect is best left as a choice for a developer and the market that is being targeted.	*Amendments sought* 1. *REr.17B.1* *Development of up to three residential units on a site is a permitted activity~~, provided that the development complies with all the permitted conditions in this Rule Table~~.* 2. *Retain remaining rule framework at REr.17B.3* 3. *Delete REr.17B.3 a) and b)*
27.	7 Residential REr GRZ	REr.17C Site Coverage	Support in part	Kāinga Ora supports this standard, which enables coverage of 40% as a Permitted Activity. Kāinga Ora also support the associated RDA rule framework and associated assessment criteria where compliance is not achieved. Kāinga Ora queries whether this standard should refer to "Building Coverage", rather than "site coverage" to align with PC29's new definition of "building coverage"?	*Retain rule framework as notified, but update rule to "Building Coverage"*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
28.	7 Residential REr GRZ	REr.17D Front Yards	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved.	*Retain rule framework as notified, but include notification preclusions*
29.	7 Residential REr GRZ	REr.17E Other Yards	Support	Kāinga Ora supports this rule framework in its entirety.	*Retain rule framework as notified*
30.	7 Residential REr GRZ	REr.17F Outdoor Living Court	Support in part	Kāinga Ora supports this rule framework, including the notification preclusion statement, however, does not support clause d) or e) as this is considered too restrictive.	*Amend rule to delete clause d) and e).*
31.	7 Residential REr GRZ	REr.17G Corner Sites	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved, as infringement to this standard would be assessed by relevant traffic experts and notification would not benefit the consent process.	*Retain rule framework as notified, but include notification preclusions*
32.	7 Residential REr GRZ	REr.17H Permeable landscaped area	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved.	*Retain rule framework as notified, but include notification preclusions*
33.	7 Residential REr GRZ	REr.17I Fences REr.17I.1	Support	Kāinga Ora supports this rule framework in its entirety.	*Retain rule framework as notified*
34.	7 Residential REr GRZ	REr.17J.1 Maximum Building Height	Support	Kāinga Ora supports this rule framework in its entirety.	*Retain rule framework as notified*
35.	7 Residential REr GRZ	REr.17K.1 Daylight admission	Support	Kāinga Ora supports this rule framework in its entirety.	*Retain rule framework as notified*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
36.	7 Residential REr GRZ	REr.17L Outlook and privacy	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved. Kāinga Ora also seeks amendment from the matters of discretion, to remove privacy effects on neighbouring sites. This standard is an onsite amenity control, with other standards managing offsite amenity outcomes (e.g. setbacks, height, height in relation to boundary controls).	*Retain rule framework as notified, but include notification preclusions* *Amendments sought as follows* *REr.17L.3* *Activities that contravene a permitted condition are restricted discretionary. Discretion is restricted to:* *i. effects on the quality of on-site living environments; and* ~~*ii. privacy effects on neighbouring sites.*~~
37.	7 Residential REr GRZ	REr.17M Glazing to the street	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved. This rule seeks to manage the interface with the street (positive design and passive surveillance) and notification would not benefit the consent process.	*Retain rule framework as notified, but include notification preclusions*
38.	7 Residential REr GRZ	REr.17N Home Occupation	Support	Kāinga Ora supports this rule framework in its entirety.	*Retain rule framework as notified*
39.	7 Residential REr Medium Density Residential Zone (MRZ)	REr.18A Residential Activity	Support	Kāinga Ora supports this rule framework, but considers that non compliance with both sub clause a) and b) should be restricted discretionary to allow for alternative solutions.	*Amend REr.18A.3 and REr.18A.4 from non-complying and discretionary to restricted discretionary.*
40.	7 Residential REr MRZ	REr.18B Residential Units	Support in part	Kāinga Ora supports the permitted rule (REr.18B1) enabling up to 3 units. However, amendment is sought as	*Amendments sought*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				compliance is concurrently tied to complying with all conditions in the "rule table". This proviso is unnecessary as compliance with each condition is separately managed through other rules. Kāinga Ora supports the Restricted Discretionary activity status (REr.18B.3) where 4 or more units are proposed, subject to meeting accessibility conditions. Kāinga Ora supports the notification preclusion that applies to REr.18B.3. Kāinga Ora does not support the requirement to include 10% wheelchair accessible units where 10+ units are provided for within REr.18B.3. Kāinga Ora consider this requirement as too restrictive if not a desired option for that specific development and adds additional cost and reduction in space. Kāinga Ora consider that this design aspect is best left as a choice for a developer and the market that is being targeted.	1. *REr.18B.1* *Development of up to three residential units on a site is a permitted activity~~, provided that the development complies with all the permitted conditions in this Rule Table~~.* 2. *Retain remaining rule framework at REr.18B.3* 3. *Delete REr.18B.3 a) and b)*
41.	7 Residential REr MRZ	REr.18C Site Coverage	Support in part	Kāinga Ora supports this standard, which enables coverage of 50% as a Permitted Activity. Kāinga Ora also support the associated RDA rule framework and associated assessment criteria where compliance is not achieved. Kāinga Ora queries whether this standard should refer to "Building Coverage", rather than "site coverage" to align with PC29's new definition of "building coverage"?	*Retain rule framework as notified, but update rule to "Building Coverage"*
42.	7 Residential REr MRZ	REr.18D Front Yards	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved.	*Retain rule framework as notified, but include notification preclusions*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
43.	7 Residential REr MRZ	REr.18E Other Yards	Support	Kāinga Ora supports this rule framework in its entirety.	*Retain rule framework as notified*
44.	7 Residential REr MRZ	REr.18F Outdoor Living Court	Support	Kāinga Ora supports this rule framework, including the notification preclusion statement, however, does not support clause d) or e) as this is considered too restrictive.	*Amend rule to delete clause d) and e).*
45.	7 Residential REr MRZ	REr.18G Corner Sites	Support	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved, as infringement to this standard would be assessed by relevant traffic experts and notification would not benefit the consent process.	*Retain rule framework as notified, but include notification preclusions*
46.	7 Residential REr MRZ	REr.18H Permeable landscaped area	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved.	*Retain rule framework as notified, but include notification preclusions*
47.	7 Residential REr MRZ	REr.18I Fences	Support	Kāinga Ora supports this rule framework in its entirety.	*Retain rule framework as notified*
48.	7 Residential REr MRZ	REr.18J Maximum Building Height	Support	Kāinga Ora supports this rule framework in its entirety.	*Retain rule framework as notified*
49.	7 Residential REr MRZ	REr.18K Daylight admission	Support	Kāinga Ora supports this rule framework in its entirety.	*Retain rule framework as notified*
50.	7 Residential REr MRZ	REr.18L Outlook and privacy	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved. Kāinga Ora also seeks amendment from the matters of discretion, to remove privacy effects on neighbouring sites. This Standard is an onsite amenity control, with other	*Retain rule framework as notified, but include notification preclusions* *Amendments sought as follows* *REr.17L.3* *Activities that contravene a permitted condition are restricted discretionary.*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				standards managing offsite amenity outcomes (e.g. setbacks, height, height in relation to boundary controls).	*Discretion is restricted to:* *iii. effects on the quality of on-site living environments; and* ~~*privacy effects on neighbouring sites.*~~
51.	7 Residential REr MRZ	REr.18M Glazing to the street	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved. This rule seeks to manage the interface with the street (positive design and passive surveillance) and notification would not benefit the consent process.	*Retain rule framework as notified, but include notification preclusions*
52.	7 Residential REr MRZ	REr.18O Non-residential activity	Support in part		*Amend to incorporate community facilities*
53.	7 Residential REr MRZ	REr.18S Building Length	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved.	*Retain rule framework as notified, but include notification preclusions*
54.	7 Residential REr MRZ	REr.18T Building adjoining a site in a heritage precinct, or containing a heritage building or object	Oppose	Kāinga Ora does not support the proposed 8m height restriction pertaining to buildings adjoining a historic heritage precinct or scheduled building. The scope of discretion in regards to the effect on historic heritage values is too broad, and would likely lead to undue consenting burdens in the application of this rule. Applying a blanket 8m height limit is a blunt tool for protecting heritage values.	1. *Delete 8m height limit* 2. *Amend assessment criteria (REr.18T.4) to incorporate a significance of heritage building into the assessment.*
55.	7 Residential REr High Density Residential Zone (HRZ)	REr.19A Residential Activity	Support	Kāinga Ora supports this rule framework, but considers that non compliance with both sub clause a) and b) should be restricted discretionary to allow for alternative solutions.	*Amend REr.19A.3 and REr.19A.4 from non-complying and discretionary to restricted discretionary.*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
56.	7 Residential REr HRZ	REr.19B Residential Units	Support in part	Kāinga Ora supports the permitted rule (REr.19B1) enabling up to 3 units. However, amendment is sought as compliance is concurrently tied to complying with all conditions in the "rule table". This proviso is unnecessary as compliance with each condition is separately managed through other rules. Kāinga Ora supports the Restricted Discretionary activity status (REr.19B.3) where 4 or more units are proposed, subject to meeting accessibility conditions. Kāinga Ora supports the notification preclusion that applies to REr.19B.3. Kāinga Ora does not support the requirement to include 10% wheelchair accessible units where 10+ units are provided for within REr.19B.3. Kāinga Ora consider this requirement as too restrictive if not a desired option for that specific development and adds additional cost and reduction in space. Kāinga Ora consider that this design aspect is best left as a choice for a developer and the market that is being targeted.	*Amendments sought:* 1. *REr.19B.1* *Development of up to three residential units on a site is a permitted activity~~, provided that the development complies with all the permitted conditions in this Rule Table~~.* 2. *Retain remaining rule framework at REr.19B.3* 3. *Delete REr.19B.3 a) and b)*
57.	7 Residential REr HRZ	REr.19C Site Coverage	Support in part	Kāinga Ora supports this standard, which enables coverage of 50% as a Permitted Activity. Kāinga Ora also support the associated RDA rule framework and associated assessment criteria where compliance is not achieved. Kāinga Ora queries whether this standard should refer to "Building Coverage", rather than "site coverage" to align with PC29's new definition of "building coverage"?	*Retain rule framework as notified, but update rule to "Building Coverage"*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
58.	7 Residential REr HRZ	REr.19D Front Yards	Support	Kāinga Ora supports this rule framework in its entirety.	*Retain rule framework as notified*
59.	7 Residential REr HRZ	REr.19E Other Yards	Support	Kāinga Ora supports this rule framework in its entirety.	*Retain rule framework as notified*
60.	7 Residential REr HRZ	REr.19F Outdoor Living Court	Support	Kāinga Ora supports this rule framework, including the notification preclusion statement, however, does not support clause d) or e) as this is considered too restrictive.	*Amend rule to delete clause d) and e).*
61.	7 Residential REr HRZ	REr.19G Corner Sites	Support	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved, as infringement to this standard would be assessed by relevant traffic experts and notification would not benefit the consent process.	*Retain rule framework as notified, but include notification preclusions*
62.	7 Residential REr HRZ	REr.19H Permeable landscaped area	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved.	*Retain rule framework as notified, but include notification preclusions*
63.	7 Residential REr HRZ	REr.19J Maximum Building Height	Oppose in part	Kāinga Ora consider that a height of 22m is more appropriate within the high density zone to properly allow for 6 storeys. A height of 22m allows for minimum floor level and floor to ceiling height and design variations.	*Amend REr.19J.1 as follows:* *The maximum permitted height for buildings is ~~19.5m~~ 22m.*
64.	7 Residential REr HRZ	REr.19K Daylight admission	Oppose in part	Kāinga Ora supports, in part, the more enabling height in relation to boundary provisions for the High Density Zone. However, Kāinga Ora seeks the following changes to better enable flexibility in design choice for developments.	*Amend Rer.19K.1 as follows:* *Buildings are permitted if:* *a. they do not project beyond a 60° recession plane measured from a point:* *i. 19m ~~12m~~ above ground level along all side and rear boundaries within 23.5m from the road frontage; and*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					ii. 8m ~~4m~~ above ground level along all other side and rear boundaries;
65.	7 Residential REr HRZ	REr.19L Outlook and privacy	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved. Kāinga Ora also seeks amendment from the matters of discretion, to remove privacy effects on neighbouring sites. This Standard is an onsite amenity control, with other standards managing offsite amenity outcomes (e.g. setbacks, height, height in relation to boundary controls).	*Retain rule framework as notified, but include notification preclusions* *Amendments sought as follows* *REr.19L.3* *Activities that contravene a permitted condition are restricted discretionary. Discretion is restricted to:* *iv. effects on the quality of on-site living environments; and* *~~privacy effects on neighbouring sites.~~*
66.	7 Residential REr HRZ	REr.19M Glazing to the street	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved. This rule seeks to manage the interface with the street (positive design and passive surveillance) and notification would not benefit the consent process.	*Retain rule framework as notified, but include notification preclusions*
67.	7 Residential REr HRZ	REr.19O Non-residential activity	Support		*Amend to incorporate community facilities*
68.	7 Residential REr HRZ	REr.19S Building Length	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved.	*Retain rule framework as notified, but include notification preclusions*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
69.	7 Residential REr HRZ	REr.19T Building adjoining a site in a heritage precinct, or containing a heritage building or object	Oppose	Kāinga Ora does not support the proposed 8m height restriction pertaining to buildings adjoining a historic heritage precinct or scheduled building. The scope of discretion in regards to the effect on historic heritage values is too broad, and would likely lead to undue consenting burdens in the application of this rule. Applying a blanket 8m height limit is a blunt tool for protecting heritage values.	*Delete 8m height limit* *Amend assessment criteria (REr.19T.4) to incorporate a significance of heritage building into the assessment.*
70.	7 Residential REr. GRZ, MRZ, HRZ	REr. 19V Papakāinga development (Schedule Sch. AA)	Support	Kāinga Ora supports this rule framework in its entirety.	*Retain rule framework as notified*
71.	7 Residential All residential zones	REr.38 Parking	Support in part	Kāinga Ora support the rule framework but consider that non compliance with the rule should be restricted discretionary.	*Amend rule activity status from discretionary to restricted discretionary and include appropriate matters of discretion.*
72.	7 Residential All residential zones	REr.38A Cycle Parking	Support in part	Kāinga Ora support this rule and activity status, but seeks that a non-notification clause is provided for contravening the rule.	*Include non notification clause when contravening the rule.*
73.	7 Residential All residential zones	REr.43A State Highway Noise – Acoustic Insulation	Oppose	Kāinga Ora oppose 'blanket' distance corridors from road and rail corridors provisions in District and Unitary plans – the effects as generated from rail activity require site specific assessment, with measurement and modelling to clearly identify what level of noise is experienced at what distance from the railway line, taking into account all of the factors that affect those noise levels, including topography, actual and predicted level of activity on the railway corridor, nature of use etc. It is only after doing this assessment that an assessment can be made of the actual likely potential effects on health and amenity. Kāinga Ora seeks that these effects are spatially modelled based on the	*Amendments sought* 1. *Delete all provisions, being objectives, policies and rules.* *or alternatively consider:* a) *Amend rule framework so it is based off modelled noise contours and an associated overlay.* b) *Amend mechanical ventilation standards to allow for alternative design.*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				actual effects, and, if they are to be regulated on the receivers, then they should be shown in the NRMP.	c) *Remove vibration from matters of discretion.* d) *Remove inconsistencies between this rule and zone based fence standards.* e) *Amend activity status to restricted discretionary.*
VOLUME 2 – ZONES – CHAPTER 8 INNER CITY ZONE					
74.	Inner City Description - centre	Policy ICd.9	Support	Kāinga Ora support this policy as it recognises increasing number of 4+ storey buildings and that building heights will increase over time	*Retain as notified*
75.	Inner City Description - centre	Policy ICd.11	Support	Kāinga Ora support this policy as it explicitly enables and encourages increase in density and diversity of housing.	*Retain as notified*
76.	Inner City Objective IC1 form and access	IC1.6 parking	Support	Kāinga Ora support that parking minimums have been removed	*Retain as notified*
77.	Inner City Objective IC2 Street and public amenity	IC2.3 quality of the public realm	Support	Kāinga Ora support this objective.	*Retain as notified*
78.	Inner City Objective IC4 Housing	IC4A and IC4A.1 residential amenity	Support in part	Kāinga Ora supports these objectives in that they provide for high density housing in the city centre and acknowledges residential amenity will be different to suburban areas, however, considers that opportunities where residential could appropriately be located at ground-floor can be provided for and that a focus on ensuring good oversight of the street and other public places rather than requiring the orientation of windows and	*Amend policy as follows:* *Enable residential activities, and ensure development achieves a good level of amenity for residents consistent with the mixed use character of suburban centres, including by:*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				balconies over the street is provided within the policy chapeau.	a. *Locating residential units above ground floor level to provide privacy, unless the residential unit is set back from the street frontage or designed to manage privacy ;* b. *Orientating windows to ensure good oversight of the street and other public places ~~and balconies over the street~~;* c. *Providing adequate daylight access for residential units;* d. *Acoustically insulating residential units so they are reasonably quiet indoors; and* e. *Providing the amenities necessary to meet the day-to-day needs of residents.*
79.	Inner City Rules	ICr.37B New buildings and alterations and amendments	Oppose in part	Kāinga Ora considers that matter of discretion IC.37B iii conflates heritage values which are addressed in other rules specifically focussed on heritage precincts. The term 'adjacent' is also not defined and increases discretion.	*Amend matters of discretion as follows:* *A new building, or any alterations and additions to existing buildings that are not otherwise permitted by ICr.37B.1 are a restricted discretionary activity.* *Discretion is restricted over:* *i. effects of the building design and development layout on the visual quality and interest of streets and public open spaces; and*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					ii. effects on amenity values for building occupants, including access to the street and provision for waste; and ~~*iii. effects on the heritage values of adjacent heritage precincts or scheduled buildings; and*~~ *iv. effects on residential amenity values for building occupants, including outlook, privacy and storage.* *Resource consent applications will be considered without notification, or obtaining written approval of affected persons.*
80.	Inner City Rules	ICr.37D Residential activity	Support in part	Amend rules in line with changes to objective and policy.	*Amend rule to provide opportunities where residential activities could be appropriately be located at ground-floor i.e. – when located at the rear of the site with no street frontage.*
81.	Inner City Rules	ICr.40A Outlook space	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved. Kāinga Ora also seeks amendment from the matters of assessment, to remove privacy effects on neighbouring sites. This Standard is an onsite amenity control, with other standards managing offsite amenity outcomes (e.g. setbacks, height, height in relation to boundary controls).	*Retain rule framework as notified, but include notification preclusions* *Amendments sought as follows:* *Assessment criteria Cr.40A.4* *Activities that contravene a permitted condition are restricted discretionary. Discretion is restricted to:*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					a) *effects on the quality of on-site living environments; and* b) ~~*privacy effects on neighbouring sites....*~~
82.	Inner City Rules	ICr.55B Papakāinga development	Support	Kāinga Ora supports papakāinga development within the Inner City Zone.	*Retain rule as notified.*
83.	Inner City Rules	ICr.65 – alterations to any building excluding listed heritage buildings	Oppose in part	Kāinga Ora considers that the matters of discretion ICr.65.4 D iii and iv are too broad and provide little tangible matters to address.	*Amend the matters of discretion as follows:* *Discretion is restricted to:* *i. location, design and external appearance; and* *ii. materials used; and* ~~*iii. effects on the heritage values of the precinct, including any cumulative or precedent effects; and*~~ ~~*iv. effects on the cohesiveness of the streetscape of the heritage precinct.*~~
84.	Inner City Rules	ICr.88 – subdivision rules relating to overlays	Oppose in part	Kāinga Ora consider that subdivision within the Liquefaction Hazard Overlay can be adequately managed through site specific foundation design as opposed to restrictions on subdivision.	*Amend rule to a controlled activity from restricted discretionary with matters of control focused on foundation and network utility design.*
VOLUME 2 – ZONES – CHAPTER 9 SUBURBAN COMMERCIAL ZONE					
85.	Chapter 9 objectives and policies	Policy SC2.5A scale of buildings	Support	Kāinga Ora supports this policy as it provides for greater heights adjacent to high density development which provides for better urban form outcomes.	*Retain policy as notified.*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
86.	Chapter 9 objectives and policies	Objective S2A housing and policy SC2A.1 residential amenity	Support in part	Kāinga Ora supports these objectives in that they provide for high density housing in the city centre and acknowledges residential amenity will be different to suburban areas, however, considers that opportunities where residential could appropriately be located at ground-floor can be provided for and that a focus on ensuring good oversight of the street and other public places rather than requiring the orientation of windows and balconies over the street is provided within the policy chapeau.	*Amend policy as follows:* *Enable residential activities, and ensure development achieves a good level of amenity for residents consistent with the mixed use character of suburban centres, including by:* *a. Locating residential units above ground floor level to provide privacy, unless the residential unit is set back from the street frontage or designed to manage privacy;* *b. Orientating windows to ensure good oversight of the street and other public places ~~and balconies over the street~~;* *c. Providing adequate daylight access for residential units;* *d. Acoustically insulating residential units so they are reasonably quiet indoors; and* *e. Providing the amenities necessary to meet the day-to-day needs of residents.*
87.	Chapter 9 Rules	SCr.20A residential amenity	Support in part	Amend rules in line with changes to objective and policy.	*Amend rule to provide opportunities where residential could be appropriately be located at ground-floor as follows:* *A residential activity is a permitted activity provided that:*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					it is located above the ground floor of any building or if located at ground level, does not have street frontage; and
88.	Chapter 9 Rules	SCr.20B Papakāinga Development	Support	Kāinga Ora support the enablement of papakāinga within the Commercial Zone.	*Retain rule as notified.*
89.	Chapter 9 Rules	SCr.30A residential unit – outlook space	Support in part	Kāinga Ora supports this rule framework; but seeks amendment to include notification preclusions (both public and limited notification) where compliance is not achieved. Kāinga Ora also seeks amendment from the matters of assessment, to remove privacy effects on neighbouring sites. This Standard is an onsite amenity control, with other standards managing offsite amenity outcomes (e.g. setbacks, height, height in relation to boundary controls).	1. *Retain rule framework as notified, but include notification preclusions* 2. *Amendments sought as follows* *Assessment criteria SCr.40A.4* ~~*a. Whether direct overlooking of another residential unit's habitable room window is minimised...*~~
90.	Chapter 9 Rules	SCr.30C – residential unit – acoustic insulation	Oppose in part	Kāinga Ora considers that Appendix 19 is out of date and should be revised to incorporate new acceptable acoustic products being available.	*Amend Appendix 19 to include new acoustic products.*
91.	Chapter 9 Rules	SCr.36A state highway noise – acoustic insulation	Oppose	Kāinga Ora recognises the importance of managing adverse noise effects and ensuring living environments are healthy and pleasant. However, the current rule framework is not supported and changes are sought. Kāinga Ora opposes a rule framework which is based on a standardised corridor approach and supports a modelled noise contour. Kāinga Ora notes that some of the permitted conditions requires fence treatment that would contravene zone based fence rules.	*Amendments sought* 1. *Delete all provisions, being objectives, policies and rules.* *or alternatively consider:* a) *Amend rule framework so it is based off modelled noise contours and an associated overlay.*

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Kāinga Ora considers that mechanical ventilation requirements should also allow for alternative design can be proposed by a suitably qualified and experienced HVAC expert. Kāinga Ora opposes matters of discretion which includes vibration considerations within an acoustic focused rule framework.	b) *Amend mechanical ventilation standards to allow for alternative design.* c) *Remove vibration from matters of discretion.* d) *Remove inconsistencies between this rule and zone based fence standards.* e) *Amend activity status to restricted discretionary.*
92.	Chapter 9 Rules	SCr.74 subdivision in slope instability 1, 2, or 3 overlay, debris run-out overlay, liquefaction overlay	Oppose in part	Kāinga Ora consider that subdivision within the Liquefaction Hazard Overlay can be adequately managed through site specific foundation design as opposed to restrictions on subdivision.	*Amend rule to a controlled activity from restricted discretionary with matters of control focused on foundation and network utility design.*
VOLUME 2 – ZONES – CHAPTER 10 INDUSTRIAL ZONE					
93.	Industrial Zone rules	INr.72A liquefaction hazard overlay - building or network utility	Oppose in part	Kāinga Ora consider that buildings or network utilities within the Liquefaction Hazard Overlay can be adequately managed through site specific foundation design.	*Amend rule to a controlled activity from restricted discretionary with matters of control focused on foundation and network utility design.*
94.	Industrial Zone rules	INr.76 Liquefaction hazard overlay - subdivision	Oppose in part	Kāinga Ora consider that subdivision within the Liquefaction Hazard Overlay can be adequately managed through site specific foundation design.	*Amend rule to a controlled activity from restricted discretionary with matters of control focused on foundation and network utility design.*
VOLUME 3 – APPENDICES					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
95.	19 Acoustic Insulation Requirements		Oppose in part	Kāinga Ora considers that Appendix 19 is out of date and should be revised to incorporate new acceptable acoustic products being available.	*Amend Appendix 19 to include new acoustic products.*