Firstly, the proposed Plan Change29 is presented in such a complex and immensely worded manner that I suspect it would take years to understand. I also suspect that even those responsible for concocting the document, because of its sheer size, do not fully understand its effects and potential effects and I want to remind the Council and Commissioners of the Plain Language Act 2022 and ask if in all honesty this Plan Change Document meets the expectations of that Act. So on the basis that I don't honestly believe anyone can possibly follow the document through its thousands of pages and determine exactly what the potential outcomes could be, I contend that it should be rejected in its entirety.

THE PROBLEM COMES FIRST

The use of population and housing requirement projections that have been highly criticised by experts in that field is of extreme concern. You cant actually solve the problem when the problem has been so badly misrepresented. A solution cannot be allowed to be based on incorrect growth expectations when in fact the problem may be considerably diminished or not even exist if the growth statistics were corrected.

I am sure that in your roles as commissioners you have come across Dr Natalie Jackson, New Zealands acknowledged pre-eminent research demographer. I know she has presented at Local Government NZ conferences.

Professor, Dr Jackson has previously examined the methodology NCC's planning department have designed and used as the methodology to project future population requirements. Presumably on which this Plan Change is based.

Professor Jackson's comments as referred to in Dr Hayes submission, where Prof Jackson states she "cant believe the audacity of this modelling" and that "the population projection that

Kaye

blocks, which will become our first city slums. We only need to look overseas to see the evidence of that.

SLIDE 2, 3, 4

Here are some examples in our city, developed under our current planning requirements that show intensification can already occur

IN RESPECT OF SUNSHINE

a.) Nelson has high sunshine hours, beaches and beautiful surroundings. It is also an established artisans area and is recognised as a hotbed of alternative and clever thinkers. It's a very desirable place to live

Frankly, it appears to me that if you could build enough houses to completely satisfy demand this year, within another two or three years the demand would likely be just as great again. It's that demand that keeps our real estate prices up and ensures that affordable housing for entry level purchasers is and likely always will be, scarce. That's common in desirable areas anywhere in the world.

A prime example is our near neighbour, the Gold Coast and increasingly the Sunshine Coast where housing costs are astronomical and ever increasing,

.

The massive construction that has occurred there over the last 20 years has done NOTHING to alleviate the housing shortage.

SLIDE 5

We should expect the shortage of housing to worsen here in Nelson because of the similar attraction of our wonderful climate and

surroundings. Unfortunately unless NZ converts to a communist equality regime, many will never be able to afford it.
We all unfortunately have to live where our budget will allow It seems very naïve to think that a housing shortage in Nelson will ever be a thing of the past, unless of course we adopt a Plan Change that allows for the deprivation of sun on our homes and creates future slums, so diminishing its desirability.

HOUSING DEMAND PREFERENCES STUDY

NCC and TDC jointly commissioned a study on Housing Demand Preferences from ***m.e. Consulting*** in 2021. I don't believe the situation in this region has changed dramatically, or at all, since 2021.

That study gave weight to some generally well known findings.

The most important thing to householders in both Nelson and Tasman (figure 4.9 and 4.10 of the report) is the **SUN.**

This is not reflected in the Executive Summary. That appears to be because the response from **Renters** is included in the executive summary. It is understandable that a "safe from crime and natural hazards" home is more important to renters.

It is unlikely that they will opt to be housed in the High rise, high density buildings proposed by KO because of the propensity for antisocial behaviour and crime that tends to be rife in such complexes

So sun and safety top the list for Nelsonians SEEKING ACCOMODATION

Such blocks have long been shown to exacerbate the issues whereas smller units scattered through the community have been shown to assist in the integration of these residents into society. Surely that is the outcome Nelson should be promoting.

The proposed placement of high density social housing blocks within areas of existing low density suburban areas has been acknowledged by the

environment court to have a significant adverse impact on the existing communities. That acknowledgement refers to the lack of contribution and integration of the residents of those blocks into the existing communities.

Slide 7 & 8

Retaining the current recession planes or, as we know them, sunlight angles would not necessarily prevent the development of high rise buildings but would ensure they were well designed and without serious effects on the neighbouring properties .Retaining the current daylight planes will ensure high rise buildings have room for green spaces, gardens, parking -THEREBY getting over the governments lack of requirement- and maybe even room for playgrounds or pools in the buildings surrounds, thereby providing much better integration into the community, living experience for residents and catering to their enhanced health and wellbeing. Ie= good design!!

It does seem a nonsense in this age of heightened awareness of environmental issues to be proposing design rules that allow the economic, sustainability, and health and wellbeing attributes of buildings to be ignored.

Making use of sun for health, outdoor activity and vitamin D as well as solar heating, (active by solar panels and passive through the use of windows, porches and conservatories.) seems, in these days of climate emergency, the dire straits of our health system, the energy crisis and poverty of so many who could benefit from them, to be a no brainer.

Futher, to deny these benefits in the neighbourhoods proposed seems to me to be a cruel exacerbation of discrimination particularly against those who have less ability to demand and fight for their needs and more requirement for our consideration and care.

New buildings by way of NRMP Policy D13A 5.1 are expected to consider sustainability and the solar orientation of buildings and sites for the encouragement of the use of renewable energy sources, but are then allowed to ignore any of those same effects on the existing neighbouring buildings.

I wonder how that can be good planning.

The effect that the reduction of sunlight on a property has on that property's value cannot be underestimated, and that is even more pronounced in our region where SUN is the number one consideration in housing. The effect on the value therefore of a 6 story building, or even a 3 story building can be catastrophic. When your neighbour is zoned HD and sells to a developer who builds a 6 story building and takes all of the sun (but not of the daylight so its allowed) the value of your property will plummet, but not your mortgage or your rates as the new high rise will not effect the land value. In fact that could rise because of the development potential (which will in turn put your rates up) but it will not rise in terms of being able to get a fair selling price. The outcome- more people in significantly reduced circumstances and ultimately expanding lower socio economic areas in our communities.

CHANGING THE COMMUNITY ENVIRONMENT.

The dangers of high density Social housing even in quality new subdivisions can be seen in Whangarei where a complete stage (35 houses together) in a new subdivision called Taika Rise has been purchased by Kainga Ora and, despite only 24 being completed so far, is already creating problems and has seen the value of neighbouring new houses drop by a reported $100,000. The problem is not the number of houses or selectively placing "in need" families in nice new homes in good quality developments but in introducing high density social housing in any area. This works against both the neighbouring property values and the integration of those in the social housing.

The most successful social housing initiatives in NZ took place in the 70s and 80s when Housing NZ purchased houses on the open market scattered among the local communities. This not only took away the stigma associated with being in a social housing estate but by its anonymity it encouraged neighbourhood support and integration. Additionally most of these homes were sold on the "Rent to buy" or "Home buy" schemes which encouraged this integration and gave hope and pride to the occupants that is sadly lacking in Social Housing estates.

In short, if were are ever going to have successful social housing, it needs to be carefully planned and controlled by cities who really care and not left to Government departments who just want their :in need" figures reduced to crow about in the next election campaign or developers whose only interest is the money to be made-mostly from those same government departments.

This plan change clearly supports high density social housing and therefore all matters within it that allow that should be scrapped if we want to keep this city a desirable location. Simply retaining the current Recession Planes would ensure much better developments.

I have therefore submitted that the proposed HDZs in and adjacent to existing communities be completely removed.

The Evidence both here and overseas is much too considerable to ignore. The higher the density of social housing the bigger the problems that arise not only in crime and antisocial behaviour but in degradation of health and wellbeing of the residents both within and surrounding the High Density Buildings.

I note with interest that Kainga Ora has advised that they have amended the plan for the proposed 6 story -multi unit building in Renwick place to a 3 story building. There is no accompanying information in respect of how many units it proposed to contain so while there is some relief, some serious concerns remain.

So I want to raise and emphasise here the need for Council to ensure that changing the floor plan of a three story -three family apartment building (as proposed for the Examiner st block) part way through construction, so that multiple smaller apartments can be contained within the same structure should require a further notified consent due to the impact such changes will have on the immediate community including the effect on parking, traffic, the size of local facilities such as green spaces, exercise areas etc.

CHURCH HILL VIEW PLANE

I note that the NRMP Policy IC2.4 ii the policy aims to ensure that buildings and structures do not block or detract from these views. Without a policy change, which I understand is a significant process, removing the Church Hill View Shaft would be contrary to the policy which would seem to make this part of PC29 impossible.