Memorandum

PC29 – S32 Report Appendix 3A

To: Nelson City Council

From: Cam Wallace – Barker & Associates Limited

Date: 15 March 2023

Re: Plan Change 29 – Zone Extent, Development Standards and related provisions – Urban Design Considerations

1.0 Introduction

The purpose of this memo is to identify relevant urban design considerations that should be considered as part of the development of Plan Change 29 to the Nelson Resource Management Plan (**NRMP**). The purpose of Plan Change 29 is to give effect to the National Policy Statement on Urban Development (**NPS-UD**), align with the Nelson Tasman Future Development Strategy 2022 and help address growing housing issues within Nelson.

This memo includes considerations of urban design matters related to the spatial extent of zones as well as provisions related to residential zones, business zones, and subdivision.

2.0 Planning Context

2.1 Draft Nelson Plan

The Whakamahere Whakatū Nelson Plan (**Draft Nelson Plan**) has been in development since 2013, and would replace the operative Nelson Regional Policy Statement (**RPS**), Nelson Air Quality Plan (**NAQP**), and NRMP. The Draft Nelson Plan is currently paused to ensure that any new Plan is consistent with the demands of RMA reforms and national policy directions.

Public feedback on the Draft Nelson Plan was sought in late 2020. Significant feedback was received regarding growth and intensification of housing.

2.2 National Policy Statement on Urban Development

The NPS-UD requires councils to plan well for growth and ensure a well-functioning urban environment for all people, communities and future generations. There are a number of objectives and policies within the NPS-UD that are of particular relevance when considering the spatial distribution of more intensive housing, including (emphasis added):

> ***Objective 1:*** *New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*
>
> ***Objective 3:*** *Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:*

(a) the area is in or near a centre zone or other area with many employment opportunities.

Objective 8: *New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.*

Policy 1: *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

(a) have or enable a variety of homes that:

(i) meet the needs, in terms of type, price, and location, of different households

(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport

Policy 5: *Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:*

(a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or

(b) relative demand for housing and business use in that location.

2.3 Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021

The Amendment Act 2021 is designed to improve housing supply in New Zealand's largest cities by speeding up implementation of the NPS-UD and increasing provision of medium density housing through the creation of the Medium Density Residential Standards (MDRS). Specified territorial authorities are required to ensure every relevant residential zone incorporates the MDRS as well as include the objectives and policies set out in clause 6 of Schedule 3A. Nelson is not a specified territorial authority.

2.3.1 Nelson Tasman Future Development Strategy 2022

The Nelson Tasman Future Development Strategy 2022 (**FDS**) was adopted in August 2022 by the joint committee of Nelson and Tasman Councils. As part of the FDS there was an increased focus on enabling greater levels of intensification across the Nelson urban area. This was supported by a broad region-wide analysis of accessibility and included an indication of the scale and intensity of development that would be required to deliver more housing through intensification. This included identifying large areas of high-density housing within and around the City Centre, Nelson South and Stoke.

The accessibility analysis took into account access to a wide range of destinations and activities including employment, retail and education opportunities, schools, open spaces, supermarkets, civic facilities, and medical facilities through use of active modes and public transport.

Section 3.17 of the NPS-UD requires authorities to have regard to an FDS when changing RMA planning documents.

3.0 Spatial Extent of Zoning

3.1 Background

There is a clear national and regional policy framework to promote and enable residential intensification of existing urban areas with a particular focus on locating intensification in areas which would better support the use of active modes of transport, reduce private vehicle use and contribute to more vibrant, well-functioning centres.

This is consistent with good urban design practice, which considers the optimal spatial arrangement of land uses relative to each other that results in the most efficient use of land. From an urban design perspective there are a number of benefits associated with intensification of residential activities in and around centres, including:

- more efficient use of scarce urban / residential zoned land;
- infrastructure efficiencies, for example a reduced need to extend reticulated water or transport networks;
- passenger transport becomes more viable in terms of reduced subsidies and more frequent services through increased patronage;
- public health benefits in terms of facilitating travel mode changes to active modes by enabling more people to live near key amenities and destinations, making walking or cycling viable modes of transport for everyday living;
- associated environmental (reduce carbon and particulate emissions) and economic benefits (reduced vehicle running costs) stemming from reduced reliance on cars and fewer car trips per household;
- increased housing choice to cater for a range of different households due to changing demographics;
- related to the above, opportunities for people to 'age in place' by changing household types as they transition through life-stages rather than having to move around a district or region based on the limited availability of different house types in any given location; and
- stronger local economies and business viability associated with increased population densities within particular market catchment areas.

3.2 Accessibility

The accessibility analysis undertaken as part of the FDS was broad and designed to apply consistently across both the Nelson and Tasman regions. To supplement this and help better inform the spatial extent of zones (and associated provisions), a network analysis of the walking catchments from key centres was undertaken.

Walking catchments (also referred to as pedestrian catchments) represent the distance that people can walk over a given time period. Although walking catchments are only specifically referred to under Policy 3 which only applies to Tier 1 urban areas, the use of walking catchments as a key metric in understanding the level of accessibility for any given area has been utilised for this work.

Accordingly, there is a need to establish the walking catchments that could reasonably apply in the Nelson context. NPSUD Guidance [1] notes that not all places are equal and different locations with different characteristics may often have different-sized walkable catchments. A general approach adopting 400m/800m catchments (equivalent to a 5 or 10-minute walk) as a starting point is consistent with standard national and international practice. However, consideration also needs to be given to how far people walk and what types of destinations they are walking to for higher values amenities (e.g. a City Centre).

The New Zealand Household Travel Survey 2015-2018 identifies 12 minutes (equivalent to around 1km) is the average trip leg for pedestrians. A trip leg is a single leg of a journey between two stops, with no stops or changes in travel mode. While the New Zealand Household Travel Survey does not currently record distances for walking trips (only times), based on a walking speed of 12 minutes per kilometre, it demonstrates that 70% of our walking trips are for distances of under 1km, while 30% are likely to involve longer distances. However, this research also indicates that journeys undertaken solely on foot tend to be longer in duration, with 34% lasting for more than 12 minutes compared to only 15% of walking trips undertaken as part of 'multi-mode' journeys. Further walk-only trips are more likely to occur for education, social/leisure or shopping purposes, and less likely to occur for work purposes[2]. There is some supporting evidence of these observations. For example, New Zealand research has shown that the llikelihood for walking to school drops off significantly at a distance of between 1.4 and 2km[3].

The three primary centres of Nelson – City Centre, Stoke and Tāhunanui – were identified as appropriate locations from which to identify walking catchments. 400, 800 and 1200m walking catchments from each of these centres was then mapped to help identify specific blocks/ parcels which may be more suitable to support higher levels of intensification given their proximity to a range of commercial and community services (refer to Figure 1 and Attachment 1 for examples).

[1] MfE (2020) *Understanding and implementing intensification provisions of the NPSUD*

[2] https://www.nzta.govt.nz/resources/nz-pedestrian-profile/5/

[3] Ikeda et al., (2018) *Built environment associates of active school travel in New Zealand children and youth: A systematic meta-analysis using individual participant data*

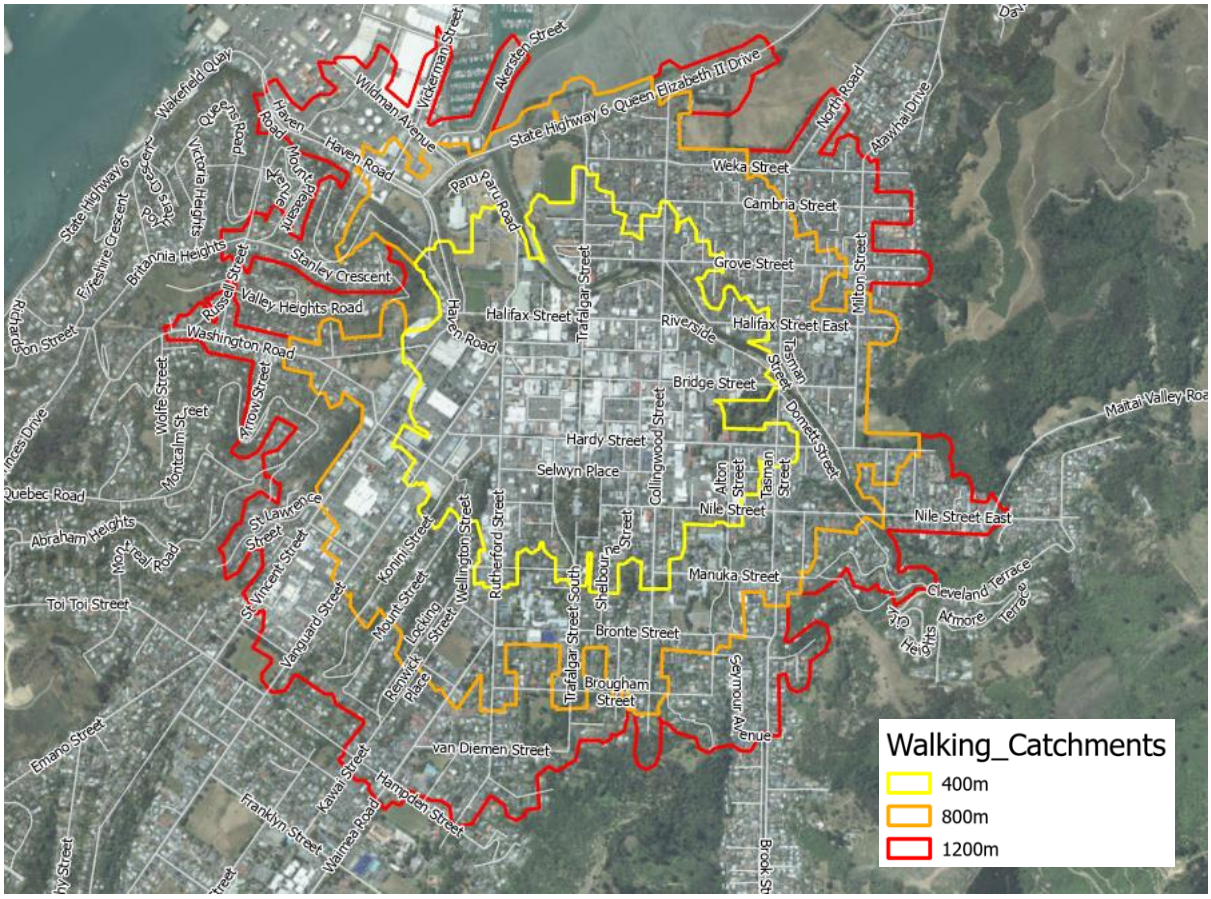


Figure 1 - Nelson City Centre Walking Catchments

3.2.1 City Centre

In terms of Nelson City Centre's accessibility and role within the urban environment of the wider Nelson/ Tasman region a larger walking catchment should be used to help inform a spatial strategy for density and zoning. There are a number of benefits to this approach (e.g. supports use of active modes of travel, increased consumer base for local business) and it is consistent with the policy intent of the NPS-UD. It would also be complimentary to many of the outcomes sought within the Inner City zones. Generally speaking, a 1200m/ 15-min walk catchment extends to the existing urban area boundaries to the north, east and south of the City Centre, supported by the fairly regular grid structure of the existing street network. However, as discussed further in Section 3.3, this catchment to the north and east is likely to be heavily constrained by the presence of natural hazards.

In terms of the 400m/ 5-min walking catchment from the City Centre, the majority of the area falls within the existing Inner City – Fringe Zone (ICFZ) and is suitable for the most intensive forms of residential development in the City (outside of the City Centre). Moving further, the 800m/ 10-min walking catchment incorporates a number of areas subject to natural hazards as well as several schools and open spaces which are themselves unlikely to support any intensification of residential and commercial activities.

As one moves south away from the City Centre, there are a number of locally significant destinations such as secondary schools, the Hospital and open spaces. In addition, there are a number of smaller suburban commercial centres in this area. This area is also served by a number of existing and proposed bus routes and key cycle routes into the City Centre. As such, I would support extending more intensive residential activities in excess of a 1200m/ 15-min walking catchment into the Nelson South area in response to its relatively high accessibility and lack of significant development constraints.

3.2.2 Stoke

As with the City Centre, a 1200m/ 15-min walking catchment covers a large portion of the available urban area in this location – extending west to State Highway 6 and east to the foothills of the Richmond Ranges. In close proximity to the centre, the Poorman Valley Stream and Marsden Recreation Ground combined with several cul-de-sacs limits some development opportunities within a 400m/ 5-min walking catchment. However, these also provide opportunities to support amenity for more intensive residential development and provide opportunities for a logical transition in building form/ scale. Beyond this, the street network is fairly well connected with the Railway Reserve Shared Path providing a key north/ south spine with access to the centre as well as a key active modes link to Nelson City Centre. Generally speaking an 800m/ 10-min catchment would be an appropriate starting point to inform the spatial application of more intensive zones with the potential to extend beyond this, primarily to the north to take advantage of access opportunities to a number of educational facilities and employment opportunities in Annesbrook.

3.2.3 Tāhunanui

As with the City Centre and Stoke, a 1200m/ 15-min walking catchment covers the majority of the urban area in this location. However, significant areas of a theoretical catchment are lost due to its coastal location whilst there are a number of development constraints including the airport, industrial activities, natural hazards and topography of the Tāhuna Hills which serve to limit development potential and the catchment extent in close proximity to Tāhunanui. Due to these constraints, and the more limited offer in terms of commercial and community services, a smaller walking catchment of 800m/ 10-min walk would be more suitable as a basis for informing locations for intensification.

3.3 Hazards

In addition to the accessibility analysis and walking catchment analysis, consideration was given to potential natural hazards in determining appropriate zone extents.

The HPC proposes to introduce updated natural hazards overlays within the HPC extent. The updated overlays have also been used to inform proposed residential rezoning. This includes excluding areas (generally entire blocks) from residential rezoning at the Wood and on the southern side of the Maitai River that are subject to the proposed Flood Hazard Overlay and High Flood Hazard Overlay and modelled to be the most impacted in a 2130 in a 1% AEP Maitai River flood event. While there are other areas proposed for rezoning that are subject to the flood hazard overlays, these are typically not whole blocks or areas.

NCC is working through the Dynamic Adaptive Planning Pathways (DAPP) process as part of assessing and responding to coastal hazards. While this work progresses, and given the extent of potential coastal inundation in Nelson, any areas within the spatial extent of the HPC that are modelled as being potentially subject to at le.ast 1m of sea level rise (SLR) by 2130 in a 1% AEP event have been excluded from proposed residential rezoning and associated intensification provisions. This includes areas in The Wood, and Tāhunanui.

In addition to flood hazards, the HPC proposes to introduce new slope instability mapping and provisions that will replace the Tāhunanui and Grampians Slope Risk overlays. The area subject to the Tāhunanui Slump Core and Fringe Slope Risk Overlay is largely being replaced by the Slope Instability Area 1 Overlay. This area of land has been excluded from residential rezoning consistent with existing restrictions on further residential development in these areas.

3.4 Zone Boundaries

Once an approximate extent for the zoning boundary was established through consideration of the accessibility analysis, walking catchments and natural hazards, further refinements and more detailed site-by-site analysis was undertaken to determine precise boundaries consistent with good urban design/ planning practice.

Generally speaking, zone boundaries should be defined used fixed physical features to provide a transition/ buffer with lower intensity zones. These features include:

- Streets/ roads/ walkways;
- Streams/ rivers;
- Open spaces/ reserves (whether zoned or not); and
- Schools.

All zone boundaries should be aligned to existing cadastral boundaries (i.e. avoid split zoning of existing titles). Where practicable, split zoning across blocks or pepper potting within blocks should ideally be avoided to minimise potential interface effects with lower intensity zones (refer to Figure 2 overleaf) and maximise development efficiency gains via site amalgamation.

Where the avoidance of split zoning across blocks is not been possible (e.g. over large blocks characterised by cul-de-sacs, blocks with an existing rural interface or where natural hazards exist) zone boundaries should be applied based on where a site obtains its primary access.

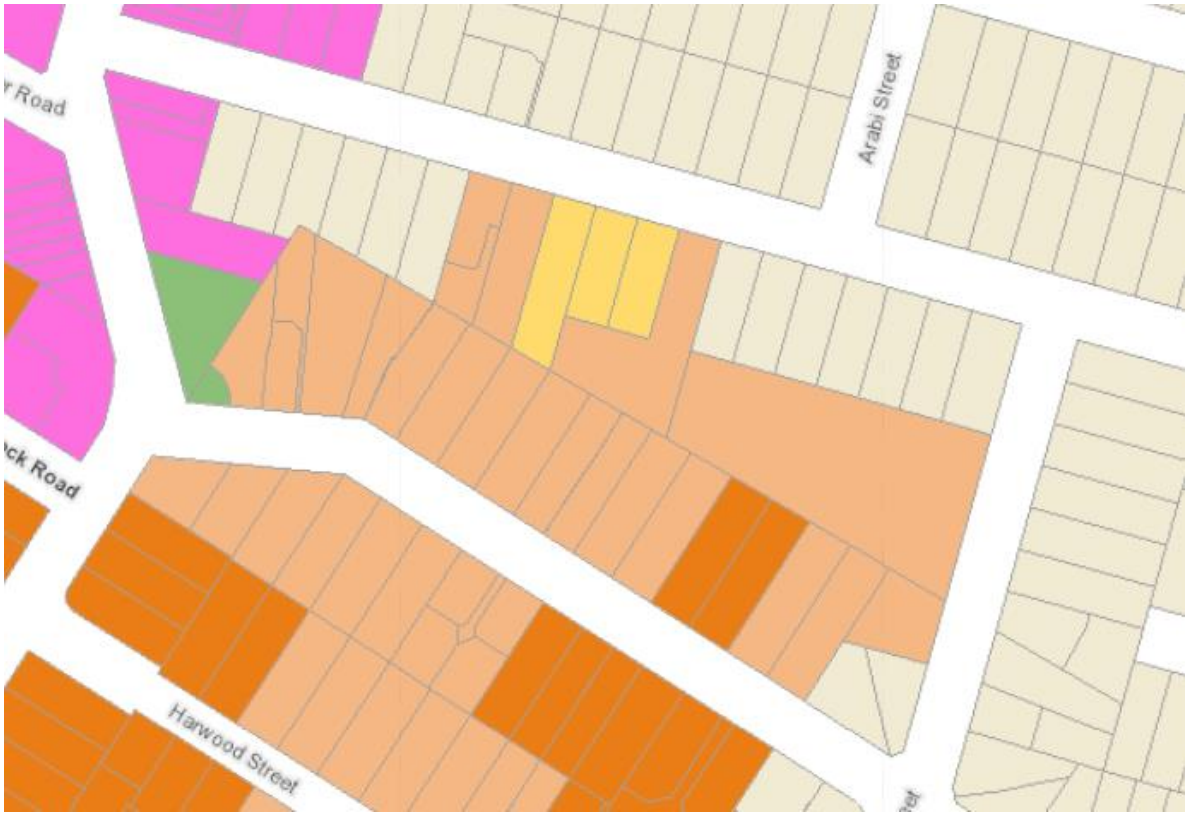


Figure 2 - Example of 4 different residential zones pepper potted across a single block within the Auckland Unitary Plan – an inefficient and complex approach which should be avoided.

4.0 Approach to Residential Zones

4.1 Zone Framework

Consistent with the Draft Nelson Plan, Plan Change 29 proposes to introduce new approach to zoning that is aligned with the National Planning Standards and consistent with the description for that zone. In light of the focus towards intensification, the following residential zones and their application were considered:

- General Residential Zone (GRZ) - Areas used predominantly for residential activities with a mix of building types, and other compatible activities.
- Medium Density Residential Zone (MDRZ) - Areas used predominantly for residential activities with moderate concentration and bulk of buildings, such as detached, semi-detached and terraced housing, low-rise apartments, and other compatible activities.
- High Density Residential Zone (HDRZ) - Areas used predominantly for residential activities with high concentration and bulk of buildings, such as apartments, and other compatible activities.

4.2 Key Changes

Key changes to residential zones proposed in Plan Change 29 include:

- A new GRZ, MDRZ and HDRZ across Nelson;

- Increased building heights and densities (over and above the Operative NRMP) in the GRZ, MDRZ and HDRZ consistent with their zone description in the National Planning Standards and FDS;
- New provisions for subdivision and removal of minimum lot sizes (excl. for vacant lot);
- Tweaks and additions to other rules to support above changes

It should be noted that the proposed provisions for each of the new residential zones are relatively consistent with changes focussed on the overall scale of development. The difference in the approach across the three new zones is shown in Figure 3 overleaf with a theoretical 450m^2 site. Whilst the existing approach to limiting the density of development in residential areas is proposed to be removed, the development standards proposed place practical limits on the potential density/ yield obtainable on any given site depending on what zone it is located in.

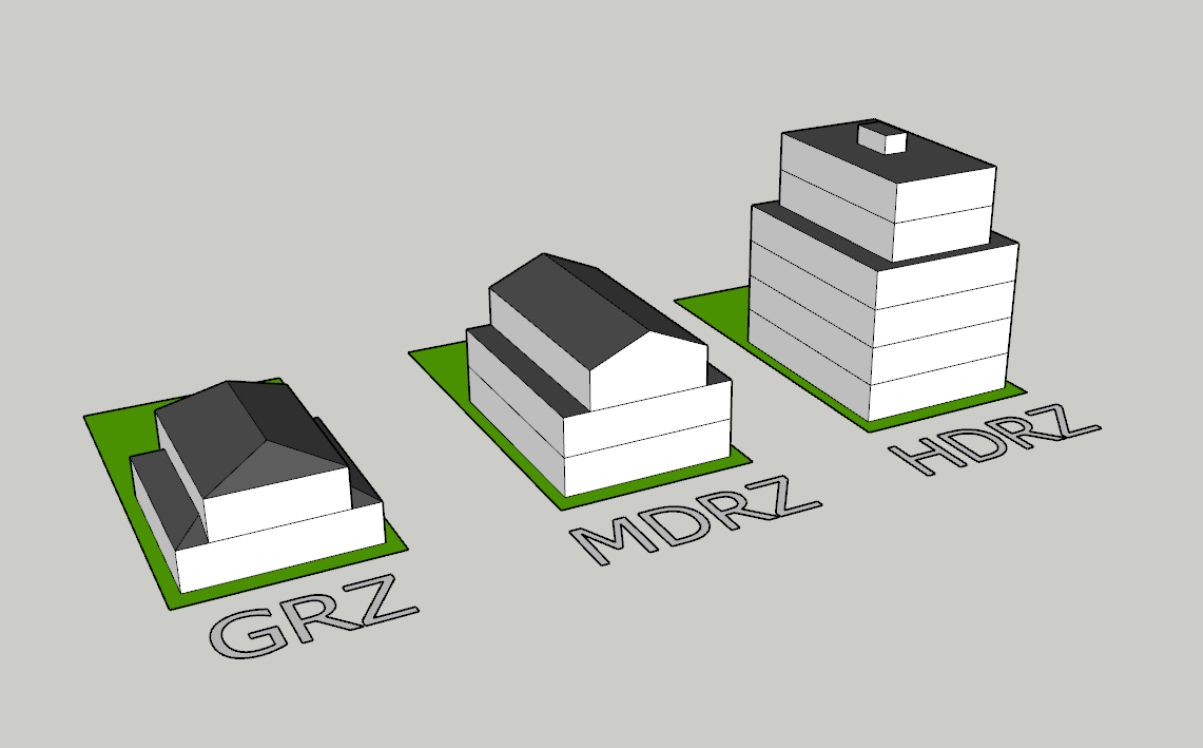


Figure 3 - Schematic comparison of scale/ density differences between residential zones within Plan Change 29

5.0 General Residential Zone

5.1 Permitted Development

A key change advanced within the GRZ is an increase in permitted development thresholds of up to three-dwellings per site and the removal of minimum site areas which currently exist under all of the operative residential zones. This provides more opportunities that enable "gentle density" and greater housing choice/ variety in existing urban areas. The relaxation of density standards within the GRZ can help to support the benefits of intensification as set out in Section 3.1 of this memo.

In my opinion, removal of the minimum site area rules does not give rise to adverse urban design issues as a range of matters can be more appropriately controlled by proposed bulk and scale controls (e.g. yards,

outlook) which will remain applicable to a permitted development and will ensure that a building and its resulting site/ lot boundaries can be designed with regard to one another.

5.2 Bulk and Scale Controls

It is proposed to relax the height (increased to 8m from 7.5m) and simplify the daylight admission control within the GRZ as compared to the operative residential zone. In addition to the removal of minimum site areas, this relaxation will support more variety in typologies such as duplexes or two-storey terraces, albeit at a suburban scale consistent with the existing environment in these areas. This effectively replaces existing provisions around comprehensive residential development.

This increased height will likely be imperceptible for the general public. It also has some additional benefits in supporting opportunities for intensification. This includes enabling higher internal floor-to-ceiling heights above Building Code minimums which can enhance daylighting and internal amenity. In addition, the increase in height better responds to a potential conflict of the increased size of floor plates of attached typologies (which are also typically flat) with the presence of topography on a site. An increase in building height can reduce the need for more significant cuts/ excavations to the ground to accommodate larger floor plates. Further, an increase in height also better enables the use of pitched roof forms (e.g. gables) on more intensive building forms ensuring that building form can better respond to some of the aesthetic qualities which are typical in more suburban settings.

The building coverage control of 40% is proposed to be maintained and this will function as the main limitation to "over-development" of any given site. This will ensure sufficient open space between and around buildings at a more "suburban" scale. These open spaces would likely be in excess of the minimum requirements around outdoor open space and permeable landscaped area that remain applicable for a permitted development where three dwellings are proposed. Where more intensive development are proposed (i..e more than three-dwellings), a combination of the building coverage, outdoor open space, landscaped permeable surfaces and outlooks spaces will contribute to maintaining a reasonable degree of openness. I also note that where car parking is provided on site for more intensive development (in typical configurations with parking spaces running parallel to the road corridor) required on-site manoeuvring controls can often act as a *de facto* 6 - 7m yard control along a side boundary.[4] In general car parking and manoeuvring space can consume 25-35% of the total site area where this is provided and acts as a major fixed constraint on development when provided.

Controls around outlook, open space, glazing[5] and landscaping have been adopted from the MDRS to provide a minimum baseline and guidance around the assessment of applications which seek to exceed the permitted threshold of three dwellings.

[4] To accommodate a tracking path for an 85th percentile vehicle in accordance with the Nelson Tasman Land Development Manual and ASNZS 2890.1 "off-street carparking" 2004, a turning radius of 5.8m needs to be incorporated within the site for a 90^{0} car parking space.
[5] Subject to some clarifications around calculating the glazed area.

5.3 Yards

The NRMP already provides for some design flexibility enabling single-storey buildings within side yards for short runs. The provides for increased design flexibility to deliver "zero-lot" typologies[6] and to consolidate areas of open space. This rule works in concert with the daylight admission rule and effectively limits the potential building utilising this control to a single storey. It is proposed to retain the operative yard control exception across the GRZ (REr.17I.1) and this flexibility is considered appropriate to better enable a range of building typologies and overall site efficiency.

6.0 Medium Density Residential Zone

Development standards of the MDRZ are based on those of the MDRS. The MDRS have been purposefully designed to enable typologies commonly understood as "Medium Density" development and is consistent with the zone description set out in the National Planning Standards. This is a different approach to zoning/ controls that has been typically undertaken across New Zealand where more intensive typologies such as walk-up apartments are required to conform with controls designed primarily to enable detached, low-density residential typologies.

The MDRS include seven core standards to enable development. These standards are intended to enable landowners to build up to three houses of up to three storeys on their site as of right on most sites with greater density enabled as a restricted discretionary activity. The MDRS are summarised as follows:

- Density: 1-3 dwellings per site – permitted and 4 or more dwellings – restricted discretionary.
- Height: 11m (with provision for up to additional 1m to enable pitched roof forms).
- Height in Relation to Boundary: 4m + 60 degrees (does not apply to common walls).
- Maximum Building Coverage: 50% of the net site area
- Minimum landscaping: A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site. May be located on any part of the development site, and does not need to be associated with each residential unit.
- Setbacks: Front yard - 1.5m Yards; Side and Rear - 1m (with additional setbacks for corner sites)
- Dwellings Fronting the Street: Any residential unit facing the street must have a minimum of 20% of the street-facing façade in glazing. This can be in the form of windows or doors.
- Outdoor Living Space - Residential Unit *at* ground floor: Must have outdoor living space:
    - Minimum 20m² area:
    - where located at ground level has no dimension less than 4m and where provided in the form of a balcony, patio, or roof terrace, is at least 8 square metres and has a minimum dimension of 1.5 metres.
    - May be grouped cumulatively in 1 communally accessible location or located directly adjacent to the unit.

[6] A *Zero-lot* typology refers to a dwelling which has a wall built along one boundary, usually a side boundary (or very close to it). They typically allow narrow lots to be used more efficiently, and allows consolidation of useable outdoor space along the sunny side of the house to be maximised on any width of lot.

- Outdoor Living Space Residential Unit *above* ground floor: Must have outdoor living space:
    - Minimum 8m² area with a minimum dimension of 1.5m.
    - May also be grouped cumulatively in 1 communally accessible location or located directly adjacent to the unit.
- Outlook Space: Principal living room outlook 4m depth x 4m width. All other habitable rooms – outlook 1m depth x 1m width.

From an urban design perspective, there are clear benefits to adopting a consistent approach to the development standards covering medium density development. The principal benefit includes national consistency to improve development efficiencies and potentially attract developers from outside of region who would be familiar with these rules from Tier 1 jurisdictions. This will provide greater certainty for the wider development community and an ability to deliver modular or standardised terraced and apartment typologies over a wider area. In this regard, there is no clear justification or benefit in design terms in requiring bespoke terraced housing or apartment designs in Nelson as compared with other urban areas across New Zealand.

However, it is noted that the MDRS are primarily focussed on developments of three or less dwellings and on typical sites, a feasible permitted development would generally be able to exceed the minimum requirements set by the MDRS. With increased density on any given site there is an increase in design complexity where a range of competing interests around access, privacy, and amenity need to be considered for future occupants and to a lesser extent surrounding properties. A review of the MDRS has highlighted some potential urban design issues which would require further refinement to the provisions to help deliver a high quality, attractive urban environment. These issues relate to:

- Visual dominance and off-site amenity effects;
- On-site amenity; and
- Streetscape interface.

To address these, refinements to the provisions including development standards and matters of discretion have been identified and are discussed below.

6.1 Maximum building length

New Zealand's predominant cadastral pattern is typically characterised by sites which are longer than they are wide. This pattern can be clearly seen across older areas of Nelson such as those around the City Centre, Nelson South and parts of Stoke. Longer sites in combination with narrower widths tends to generate buildings which extend a long way back from street frontages. This is reinforced by development standards such as side yards and Height in Relation to Boundary (HiRB) which consistently apply over the length of a site. The increased height enabled by adoption of the MDRS in combination with other standards (including engineering standards around access and parking) will likely encourage a "wall" of development running perpendicular to the street – especially for development which exceed the permitted 3 dwellings.

In addition, higher buildings in combination with the removal of density controls can potentially give rise to a number of effects, including:

- a visually dominant built form that can affect the outlook of neighbouring sites;

- directs outlook over adjoining sites impacting on privacy and the amenity of existing residents reducing a person's enjoyment of that space; and
- can create a feeling of being closed-in or contained.

Whilst people living in an urban environment can reasonably expect to see others – both in neighbouring dwellings/ private open spaces and in public places – this is generally in a more transient, incidental situation (i.e. someone walking past). The MDRS (combined with the predominant cadastral pattern) could promote a situation where dwellings are designed to permanently orientate over neighbouring sites. The impact of this increases with height (above ground level) in combination with the overall density of development (refer to Figure 4). These issues are potentially further exacerbated in the event neighbouring sites are developed under similar circumstances without clear guidance or standards that could be considered as part of a resource consent process under such a scenario (refer to Figure 5). A built example of this issue in Auckland under their Mixed Housing Urban zoning is shown in Figure 6 overleaf.

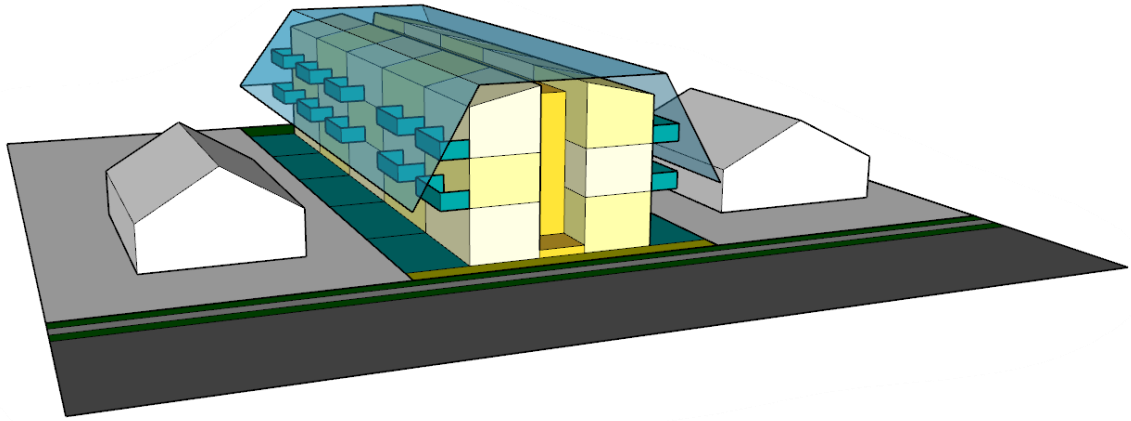


Figure 4 - Modelled walk-up apartment building compliant with the MDRS

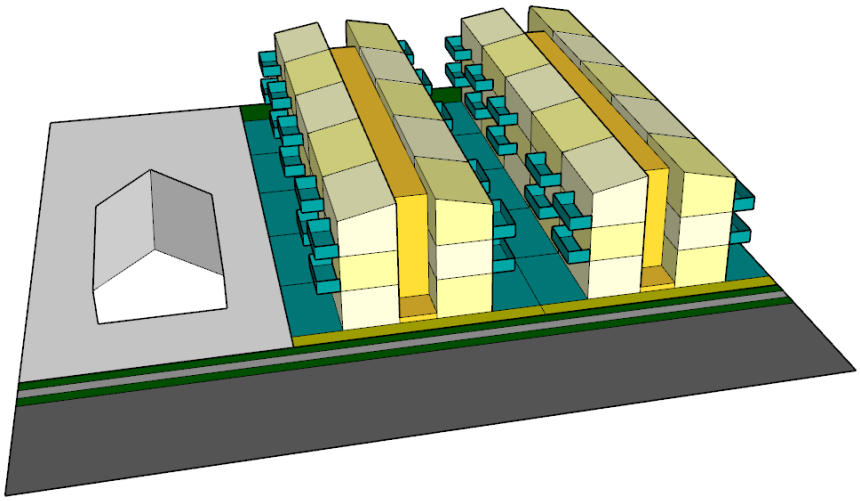


Figure 5 - Side-by-side modelled walk-up apartment buildings compliant with the MDRS



Figure 6 - Built example showing large expanses of glazing for four terraced homes orientated over side boundaries

To address the above, it is considered that there would be merit in introducing a maximum building length control above ground level[7]. There are a number of urban design benefits that a building length control could provide and adverse effects that it could manage. These include

- Limits the potential for adverse visual dominance impacts resulting from the 'wall' effect that long, low and uninterrupted building elevations perpendicular to the street can have on adjoining sites;
- Potentially encourages a greater proportion of dwellings to maximise their outlook over the street and internally towards the rear, rather than over neighbouring properties to the side;
- Allows for daylight and/ or sunlight penetration into new buildings at each end enhancing internal amenity for future residents;
- Allows for improved daylight and/ or sunlight penetration through to adjoining sites; and
- Encourages more meaningful/ functional areas of open space (private or communal) that can cater for increased on-site amenity.

Maximum building lengths of between 15m and 30m are currently in operation within district plans for Dunedin, Tauranga, Gisborne, Queenstown and New Plymouth councils. 22m has been modelled and is recommended to apply as measured perpendicular to the street only with a 4m gap between buildings, above ground floor level. This would allow 'back-to-back' type apartment development on a site to occur

[7] At ground level, potential overlooking and dominance effects would be adequately addressed by standard boundary fencing and any proposed landscaping.

and enable living spaces at each end of the buildings to access natural light.[8] The 4m gap aligns with the required outlook depth from principal living spaces and whilst exceeding the 3m minimum dimension for ground floor living spaces under the MDRS. A 4m break would also be well aligned with the probable dimensions of outdoor living spaces that comply with the 20m^2 minimum area. As such, the building length standard could complement existing standards and ensure a degree of efficiency in overall site configuration.

6.2 Minimum dwelling size

The MDRS includes no standards relating to the size of dwellings. A minimum dwelling size standard is useful for ensuring that the smallest dwellings will provide reasonable conditions of function and amenity for its design occupancy. Minimums, if set at an appropriate level, will provide a degree of guidance to the development community over the potential yield on any given site which will also assist with long-term infrastructure planning. They can also provide assurance to the wider public around the likely form and typologies of dwellings which could be expected to occur across the district.

Minimum areas of 35m^2 for a studio dwelling and 45m^2 for one or more-bedroom dwelling are considered appropriate, in urban design terms, and broadly comparable with other towns and cities across New Zealand. For example:

(a) Across residential and business zones, the Auckland Unitary Plan provides for minimum studio apartments sizes of between 30m^2 and 35m^2, and 45m^2 for one or more bedrooms;

(b) The Palmerston North District Plan enables dwellings with minimum sizes of 45m^2 without any qualifiers relating to bedrooms within identified multi-unit housing areas;

(c) The Christchurch District Plan enables studio units of 35m^2, and 45m^2 for 1-bedroom units; and

(d) Plan Change 26 of the Tauranga District Plan seeks to enable studio units of 35m^2, and 45m^2 for 1-bedroom units.

Alignment with other territorial authorities is also considered beneficial as it provides a consistent standard across multiple jurisdictions and can allow for the adoption of standardised floor plans which is a common feature of more intensive residential typologies. This will provide greater certainty for the wider development community and an ability to deliver modular or standardised terraced and apartment typologies over a wider area. This avoids the need for bespoke internal designs depending on where in the country development is occurring.

Whilst noting the that units lower than the recommended sizes can still provide appropriate living outcomes, as the internal area of a dwelling decreases greater care is required in terms of design and space planning to achieve a functional unit with sufficient amenity for occupants. As such, there is some merit in providing at least some minimum standards within the framework provided by a district plan.

[8] 8m is generally regarded as an ideal preferred depth for single aspect units (but increased depth can be suitable in instances where higher floor-to-ceiling heights or greater areas of glazing are included). Placed back-to-back, this generates a building length of approximately 17-18m when taking into account the depth of external and internal walls. The additional length proposed is intended to provide a greater degree of design flexibility including the ability to potentially accommodate an increase in the depth of units and/ or the presence by a common hallway or core area between units.

6.3 Fencing

Fencing, and to a lesser degree landscaping, can have a significant impact on the overall quality and functionality of development especially as viewed from the street or other public spaces. Ideally, fencing in front yards (if fencing is to be provided) needs to provide for both privacy for the front yard if it's a useable space and a visual connection to the street. Visual connections are important for enabling opportunities for passive surveillance. There is also a significant body of research in New Zealand and overseas which correlates lower fence heights along the street with real and perceived increases in personal safety. Figures 7 and 8 provide a comparison of the impacts of higher vs lower front fence heights and how they can contribute or detract from streetscape amenity and safety.

Standard REr.17M recognises the diversity of contextual factors which may impact on preferred fencing arrangements as well as providing for individual resident preferences. It ensures an appropriate level of visual connection is maintained between the street and a dwelling while giving flexibility and choice as to how high a front fence might be designed. In particular it provides for situations where the private open space for a dwelling may be required to be at the front of the dwelling (e.g. to take advantage of northern sun or significant view) and greater levels of privacy or security may be warranted. By allowing, and to an extent promoting variation in fence height, this standard may also discourage monotony and the visual dominance of street edges by solid high front fences which is seen particularly when they are installed on most or all frontages along a street (refer to Figure 6 below).



Figure 7 – High street fencing on a medium density development (Te Atatu, Auckland)



Figure 8 – Low street fencing on a medium density development (Hobsonville, Auckland)

6.4 Windows facing street

The MDRS includes a rule requiring residential unit facing the street must have a minimum of 20% of the street-facing façade in glazing. This can be in the form of windows or doors.

In urban design terms this is considered a generally positive rule that helps to address a real issue with more intensive development presenting a blank "side" to the street to achieve greater site efficiency within the constraints of New Zealand's predominant cadastral pattern of sites which are longer than they are wide.

However, it is considered that inclusion of the standard as drafted has the potential to create unintended consequences in terms of privacy and the general quality of a development as viewed from the street.

The reference to doors to satisfy the standard may promote a situation where a ranch-slider is utilised as a "front door" to reduce the need to accommodate an additional opening for a more traditional opaque/ solid front door. This can create potential privacy and/ or security concerns with visibility into internal spaces. In urban design terms, fenestration is an important component of overall building articulation and attractive frontages. In addition, entranceways (including front doors) are also an important design technique to add interest to a building façade and aid in wayfinding. As such, there is value in enabling front doors (whether glazed or constructed from solid materials such as wood) to count towards meeting the 20% glazing requirement.

There should also be an additional explanation setting out that garage doors cannot be counted towards meeting this requirement. There are a number of modern plexi/ laminate glass garage door configurations available (refer to Figure 9 below) that due to their size could fulfill a large portion of the required 20% glazing.



Figure 9 – Example of an opaque, plexi/ laminate glass garage door

Secondly, the standard as drafted may encourage a proliferation of flat or hipped roofs fronting the street to reduce the area of façade fronting the street to reduce the extent of glazing required and associated costs. This could have impacts on the overall attractiveness of more intensive developments and from a neighbourhood perspective it provides for the potential for some roofscape diversity and avoid a visually monotony in built form outcomes. As the purpose of the standard relates primarily to promoting interaction with the street/ passive surveillance, it would be beneficial to exclude those portions of the façade associated with non-habitable roof space from the overall calculation requirements.

6.5 Minimum balcony dimension

The MDRZ is generally located in areas which performs well in the accessibility analysis undertaken for Nelson. A key reason is the proximity to a range of amenities including hospitality and entertainment venues, open spaces and schools. Combined, these can serve to reduce the requirement for on-site outdoor living spaces and are an important 'trade-off' that distinguishes lower-density suburban housing from more intensive housing in and around centres.

Given the accessibility to theses amenities, the MDRZ (and HDRZ) would benefit from reduced outdoor living space requirements that form part of the MDRS – primarily associated with balconies. A reduction to 1.5m and 6m^2 is recommended to give greater design flexibility and reduce potential costs associated with wider cantilevered balcony solutions.

A 1.5m dimension still enables the placement of a small table and chairs whilst preserving circulation space around one side. This, in combination with the minimum areas would also allow for outside clothes drying with a drying rack, a small barbeque and potentially some small pot plants.

7.0 High Density Residential Zone

The proposed standards of the MDRS zone are generally well aligned with development within a HDRZ as they support multi-unit development, including those configured in apartment type arrangements.

However, there is a clear need to reconsider the heights and density of development enabled in this area due to its much higher levels of accessibility as well as the creation of a legible urban form which seeks to reinforce important nodes and centres via building height. In my opinion, key issues to be considered with the HDRZ primarily relate to the height of development enabled.

7.1 Maximum Height

Generally speaking, the cost of construction greater than three storeys in New Zealand increases significantly due to structing engineering, circulation and fire standards. This also creates challenges with securing and servicing funding to enable more intensive development to occur.[9] These factors, combined with higher levels of accessibility in and around Nelson City Centre, Nelson South and Stoke mean that a higher permitted building height would be appropriate. To address the above issues, a height limit of six storeys in the HDRZ is considered appropriate. This will provide a transition in scale between the increased heights proposed in commercial zones with the MDRZ and also provide an incentive for the development community to support greater levels of intensification.

In determining an appropriate height in metres equivalent to a six-storey residential building, a 19.5m height limit is proposed. This would enable six storeys with a floor-to-floor height of 3.1m (this would enable an internal floor-to-ceiling height of approximately 2.7m) and totaling 18.6m.[10] An additional allowance of 0.9m has also been included to accommodate sloping roof forms[11] and potential freeboard requirements in areas with some identified flooding issues.

The scale of a 19.5m high building is also proportionate to the scale of the street and the public realm that can be seen across New Zealand's urban areas which features a typical width of 20.1m (one imperial chain). This could provide for a street enclosure ratio of 1:1 which is regard as a well-founded rule of thumb in urban design that balances spatial definition and a sense of openness.

Additionally, matters of discretion signaling opportunities where increased height above and above permitted standards would also be beneficial.

7.2 Height in Relation to Boundary

Compliance with daylight admission standard of the MDRS is unlikely to deliver the expected higher intensity residential development anticipated in the HDRZ. In order to achieve a development of the size and scale generally anticipated for the HDRZ, there is a need for a more enabling daylight admission standard that works in concert with permitted height limits.

Apartment buildings (and to a lesser degree terraced housing development) typically require a large, flat floor plate at each level so that multiple units at each level share a stair landing and potentially a lift lobby. Taking the minimum unit sizes (recommended in Section 6.2), it would not be unreasonable to assume a floor plate of at least 260m^2 (roughly 12m wide by 22m deep). If daylight admission angles are set too

[9] Alternative housing models such as build-to-rent or community housing, as well as emerging construction technologies like light-weight structural timber may improve the feasibility of more intensive housing developments.

[10] 3m is generally regarded as the absolute minimum required to ensure sufficient internal floor-to-ceiling heights. Apartment schemes typically feature floor-to-floor heights of 3.1-3.2m while higher end developments can include floor-to-floor heights of up to 3.4m.

[11] Flat roofs still require a pitch of 3% - across a 12m wide building this equates to additional roof height of 0.75m.

restrictively it can limit the viability of achievable floorplates at upper levels, effectively acting as a *de facto* height limit.

To address the above, a number of alternative daylight admission standards and permitted building heights were tested (refer to Attachment 2) for between 15 and 21m in height. In undertaking this modelling, two different building configurations were considered – firstly, a long perpendicular form with dwellings orientated over side boundaries and secondly, a form with dwellings primarily orientated over the street and rear of the site. This was assumed to occur on a typical site with a width of 20m which sits at the lower end of what can typically be found in areas identified within the HDRZ.

In order to accommodate viable floorplates at upper levels consistent with a planned urban character of apartment living in the HDRZ, a daylight admission control of 12m + 60^0 is recommended. On a 20m wide site this would enable the development of a six-storey apartment building where the only the upper two-storeys require an additional setback from the side boundaries. At the maximum permitted height limit on a 20m wide site this would enable a floor plate of approximately 11.3m in width which is considered sufficient to produce a viable floor plate for apartment type development. This would effectively create set-backs of just over 4m from the side boundaries.

A 4m setback is sufficient in most cases to make at the majority of the upper two storeys "disappear" from view behind the leading edge of the lower form when viewed from the ground level of adjacent properties helping to reduce the perceived height of the building. A 4m setback also means that the proposed HIRB control is well aligned to the outlook standard as it could apply to the upper levels of an apartment building.

In addition to the 12m + 60^0, it is also recommended that this should only apply for the first 23.5m (1.5m front yard + 22m maximum building length) of the site from the street boundary. Beyond this, the 4m + 60^0 of the MDRZ should apply. This is intended to facilitate the greatest level of development at the site frontage consistent with a perimeter block arrangement, provide better light and outlook between more intensive building forms and avoid excessive overlooking and dominance at side boundaries. This will also enable effects associated with the additional building bulk or larger apartment buildings enabled in the HDRZ (e.g. dominance, loss of privacy) can be directed towards/ absorbed by the street (and any neighbouring front yards or roofs of existing buildings), rather than private open spaces at the rear of existing dwellings (refer to Figure 9). This will help encourage a built-form which can better promote passive surveillance of streets and supporting a high quality built-form which minimises effects on neighbouring properties.

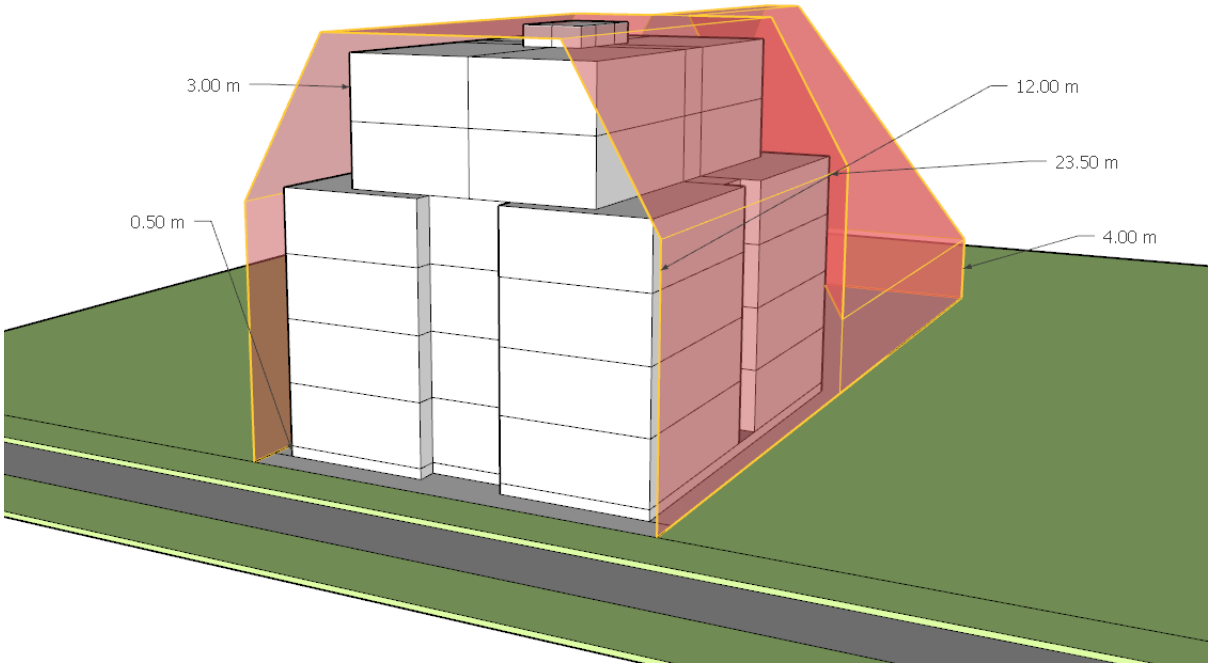


Figure 10 - Built-form enabled by bulk and massing related development standards

8.0 Subdivision

8.1 Minimum Vacant Lot

The Operative District Plan currently provides for a minimum vacant lot subdivision of 400m^2 with some variation of between 300m^2 in the Higher Density Area to 600m^2+ in other areas. This is considered unnecessarily large and not well aligned with a desire to promote greater levels of intensification. In many historical urban areas in New Zealand, detached housing has been delivered on sites of 300m^2 and lower. Similarly, contemporary medium density developments which have been comprehensively masterplanned have delivered quality detached housing on sites as little as 150m^2, whilst terraced housing typologies are often delivered on sites as small as 100m^2. I note that these smaller lot sizes would typically be achieved through a land use consent process where the design of a development can be assessed as part of the subdivision application.

In line with seeking a more enabling approach to housing, the minimum vacant lot subdivision standards could be reduced to 200m^2 with the requirement to accommodate an 8x15m building platform outside of yard requirements and other site constraints. A 200m^2 site area combined with an 8x15m building platform provides a degree of flexibility for future dwelling design. Design testing indicates that a typical stand-alone dwelling could be delivered on a smaller section than this. However, this relies on a perfectly flat site. As the standard needs to apply to residential areas more broadly it will capture sites which feature topographical constraints or geometric constraints from an irregularly shaped parent lot. Adopting a smaller site area and more constrained building platform therefore creates a risk that only a very specific building design can be accommodated which would not be consistent with seeking to enable a variety of building typologies. In my

opinion, there needs to be sufficient flexibility in the minimum vacant lot standards to enable the development of a new dwelling with undue risk of infringing development standards and creating a notification risk which can act as a barrier to development and good urban design outcomes.

9.0 Business Zones

9.1 Height

Consistent with changes to building heights/ densities within residential zones, the NPS-UD also requires consideration of building heights within commercial zones in terms of enabling greater residential and commercial densities. The City Centre and smaller centres such as Stoke and Tahunanui are identified as having the highest levels of accessibility within the Nelson district.

There are currently a range of existing permitted and discretionary building heights across the ICCZ, ICFZ and SCZ of between 8m and 21m. It is recommended that the permitted heights in the various zones be increased to reflect higher levels of accessibility (relative to other areas including the proposed HDRZ and MDRZ) and contribute to overall legibility of urban form. In urban design terms, this seeks to enable greater heights in the City Centre to help signify its importance in the wider environment and transition building scale down towards the periphery (via the HDRZ and MDRZ). This is a traditional urban design approach that also generally reflects land development economics where land prices within a city centre are typically higher and can more feasibly support more intensive development. In addition, this seeks to facilitate a greater intensity of commercial and residential development in and immediately around Nelson's centres consistent with urban form outcomes of the NPS-UD.

A building height of 24m (which can facilitate 6-8 storey development depending on use/ floor-to-floor heights) is supported for the ICCZ and ICFZ. This height is approximately equivalent to the Perpetual Guardian Building (6-storeys with an architectural height of approximately 25m). This height remains within what could typically be considered a "mid-rise" typology and would retain the feel of a human scaled environment. The proposed 24m height limit would also enable the development of a street enclosure ratio of up to 1: 1.25[12]. A building height to street width ratio of 1:1 is generally recognised to provide an optimum level of enclosure at a human scale.[13] This is important, as streets with width ratio's approaching or exceeding 1:1 tend to attract more pedestrian activity, and more small-scale, innovative, and experimental economic uses which cater to pedestrians. This is consistent with the outcomes sought in and around Nelson City Centre (e.g. IC1 Form and Access).

It is important to note the a 24m permitted building height does not necessarily preclude higher buildings (via the resource consent process). However, as building heights increase above 8-10 storeys, their complexity in terms of their design and can give rise to a number of other external issues which can impact on the surrounding environment such as the downdraught effect or shading of important public open spaces. Enabling greater building heights may require an additional suite of technical design standards. Such an approach can be seen in centre zones within Auckland and Wellington where significantly higher buildings are generally enabled. An appropriate alternative to this would be to consider these issues as part of an overall design assessment for new buildings and height infringements.

[12] Street enclosure refers to the height of buildings in proportion to the width of a street.
[13] https://at.govt.nz/media/1980686/urban-street-and-road-design-guide.pdf

In terms of the SCZ, a general increase in heights is also appropriate. However, there would be benefit in providing more bespoke height provisions for specific centres based on their levels of accessibility and position within what feels like an established centres hierarchy of Nelson. Notably, Stoke and Tahunanui fulfill more important roles in terms the provisions of a range of commercial and community services for wider residential catchments. A height of 19.5m is recommended and would facilitate development of 5 to 6-storeys. A 19.5m height in these centres enables an urban form which helps to distinguish their importance in the wider urban environment over other suburban centres across Nelson and provide an incentive in terms of feasibility to encourage more intensive mixed-use development in these centres. Outside of these centres, a general height of 12m is recommended. This is consistent with the height proposed within the MDRZ and provides for opportunities for development up to 3-storeys (e.g. ground level retail with walk-up apartments above). In addition to the above, increased height was enabled in other suburban centres under the NRMP (e.g. Wakefield Quay). Retaining extra height in line with the NRMP is considered appropriate in urban design terms due to its relative proximity to the City Centre and its location along the coast in an area of high natural amenity which can be an important driver for supporting more intensive developments. Where a suburban commercial centre adjoins any area identified within the HDRZ, there would also be benefit in increasing height to 19.5m for consistency in scale.

In addition to generally enabling increased building heights across business zones, it is important to consider the impact larger buildings can have on public realm and wider impressions of an urban area. In this regard, I believe there is merit in including additional matters of discretion and/ or assessment criteria relating to the design of new buildings – particularly where they interface with the public realm. These are discussed further in Section 9.6 of this memo.

9.2 Daylight Admission

In addition to increased building heights, it is worthwhile considering complementary changes to daylight admission standards, where the business zones adjoin a lower density residential zone. There is a risk that larger, more intensive development in business zones may result in off-site amenity impacts on directly adjacent residential properties. I note that development could include taller office buildings which do not require outlook spaces more commonly required for residential uses and discussed in Section 9.3 below. In my opinion, all commercial zones should meet the adjacent daylight admission standards that apply to the corresponding residential zone (whichever is applicable). This will aid in minimising adverse shading, privacy and dominance issues for neighbouring residential site where a different type of residential amenity is anticipated.

9.3 On-site Amenity

9.3.1 Outdoor Living Courts

A key change to the ICCZ and ICFZ is the removal of requirements for minimum outdoor living courts. The existing outdoor living court standards are impractical for inner city residential uses and in my opinion represent an inefficient use of scare urban land and provide minimal, if any, amenity benefit for residents. I would support the removal for outdoor living court requirements within the ICCZ and ICFZ. In and around centres where higher density residential uses are envisioned, there is generally more proximate access to off-site amenities not just limited to parks, but also includes entertainment facilities, social facilities, as well as food and beverage outlets. Combined, these serve to reduce the requirement for on-site outdoor living areas and are an important 'trade-off' that distinguishes low-density suburban housing from more intensive housing in and around centres. It is important to note that the removal of minimum outdoor living courts

does not preclude the incorporation of balconies or roof terraces into developments, rather flexibility is provided to the developer/ architect to deliver a housing product that responds to market demands in terms of price, quality and amenity.

It is proposed to maintain some limited minimum requirements around outdoor living courts within the SCZ. Based on these areas accessibility and reduced proximity to the wider range of commercial and community amenities available in the City Centre I support their inclusion. The proposed rules would still deliver a functional space which can accommodate some outdoor furniture whilst still allowing for movement around. These standards also help to differentiate the SCZ from the Inner City zones.

9.3.2 Outlook & Privacy

Increased residential uses within commercial zones, coupled with increased building heights and limited setbacks creates a risk of adverse amenity outcomes in residential dwellings in these areas. This risk is primarily in the form of adjacent sites being built out to their maximum extent, reducing or removing access to sunlight, daylight or outlook of existing dwellings over side boundaries if this has previously been relied upon.

To address this, dwellings should generally be encouraged to orientate themselves over the street, public open spaces or internal courtyards within the site. However, this may not always be possible or developers may seek to maximise development opportunities at the expense of future residents. To address this, the inclusion of an outlook space control would be beneficial as this provides some degree of guaranteed separation for residential units at upper levels in the event adjacent buildings are constructed. For simplicity, this should be aligned with the outlook standards of the MDRZ/ HDRZ. In addition to the above, this standard could be supported by specific matters of discretion/ assessment criteria related to on-site amenity issues to aid in the assessment of any application.

9.4 Minimum Unit Size

As with the rationale set out in Section 6.2 covering both the MDRZ and HDRZ, it is recommended that minimum unit sizes are introduced into the ICCZ, ICFZ and SCZ.

9.5 Residential at Ground Floor

It is proposed to include restrictions on ground floor residential activities at the street frontage across both the ICCZ and ICFZ. In urban design terms there are both benefits and disbenefits to this approach which are dependent on the zone context and wider package of objectives, policies and development standards.

There are a number of benefits that residential activity provides to centres and there are a number of situations where ground floor residential could be entirely appropriate, such as:

- On larger sites where ground floor residential uses can be set back and screened from the street by commercial uses.
- Through the utilisation of live/work unit typologies which provide for commercial floor space fronting the street.
- Near or at the interface with established residential areas.

Equally there are a number of instances where ground floor residential uses may be inappropriate, such as:

- They are adjacent to highly trafficked footpaths which can create a conflict in terms of privacy for residents;
- They are located on "key retail streets" and could undermine the retail experience;
- They are located immediately adjacent to activities or operational areas which can give rise to adverse amenity impacts (e.g. loading and servicing area or outdoor dining area).

In my opinion, based on the greater focus on retail and commercial uses in the City Centre this rule should be amended to cover the entire ground floor to protect these uses. Within the City Fringe, there are some restrictions on retail activity proposed and this zone would benefit from a more relaxed application to cover only the street frontage. This provides some additional flexibility for developers in designing an appropriate outcome for a particular site whilst helping to ensure that active frontages at the street interface are maintained.

9.6 New Buildings

Broadly speaking, the purpose of Plan Change 29 is to help support the potential for increased housing supply via intensification of Nelson's existing urban area, including the City Centre and outlying commercial centres. New buildings within the ICCZ, ICFZ and SCZ are currently a permitted activity.

ICr37B.3 provides for new buildings in the City Centre and City Fringe zones as a restricted-discretionary activity. Matters to which discretion is proposed to be restricted include:

i. effects of the building design and development layout on the visual quality and interest of streets and public open spaces;

ii. effects on amenity values for building occupants, including access to the street and provision for waste;

iii. effects on the heritage values of adjacent scheduled buildings;

iv. effects on residential amenity values for building occupants, including outlook, privacy and storage.

These matters of discretion are then supported by a number of detailed assessment criteria. Assessment criteria are also identified for infringements to any of the permitted development standards. This is a common approach in many 2nd and 3rd generation district plans and, from my experience, generally works well.

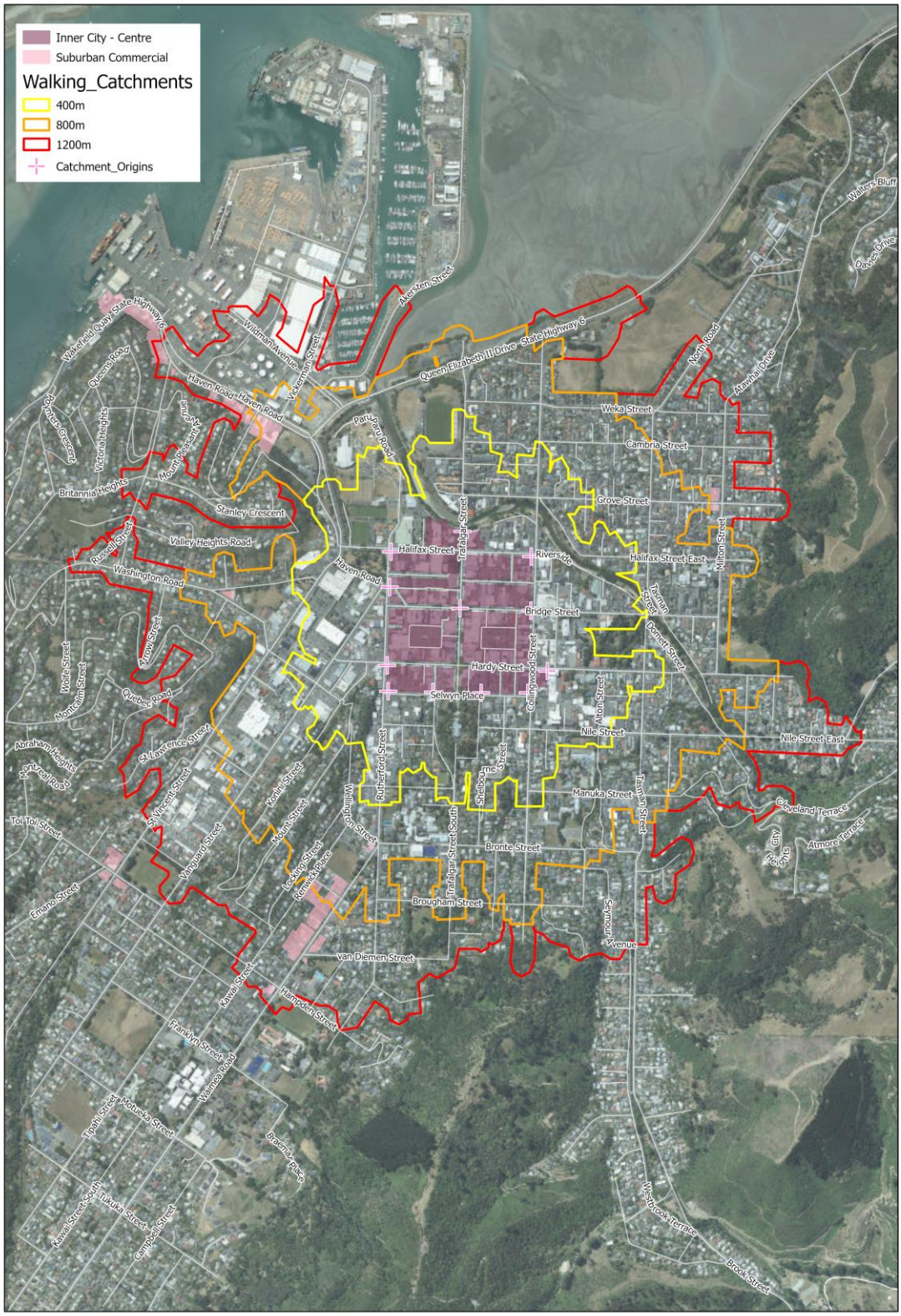
In my experience, achieving positive design outcomes as well as addressing any adverse effects within the statutory framework established under the RMA depends on the quality of planning and design provisions contained within the relevant planning document, typically through a combination of objectives, policies, rules, and assessment criteria. I consider that the proposed matters of discretion and associated assessment criteria would be appropriate. Importantly, they provide a framework for a clearly defined qualitative assessment of a restricted discretionary activity which relate to the proposed objectives and policies of the relevant zone as well key issues which, from my experience, typically arise in the design, development and occupation of more intensive residential and mixed-use proposals. The use of assessment criteria is beneficial in my opinion as it provides greater clarity as to the type of outcomes which are relevant to the broader matters of discretion. However, I acknowledge that the benefit of this approach is partly dependant on the skill of consenting planners and urban designers. There is a risk that assessment criteria are interpreted or treated like rules which must be satisfied for a proposal to been deemed appropriate. If this approach is taken, they may act as a hinderance to development.

9.7 Centre vs Fringe Development Standards – Built Form Outcomes

Proposed changes to various development standards as part of Plan Change 29 could support similar development outcomes in terms of the bulk and scale of development. However, there are a number of key differences in terms of objectives, policies and development standards which will in practice distinguish the look and feel of development within the zones from one another.

Within the ICCZ there are a number of additional built form development standards which relate to the zones role as the focal point for retail, commercial and hospitality activities within the City. These include minimum façade heights, building setbacks, verandahs display windows and building continuity. In addition, there are restrictions on some retail activities within the ICFZ that are not identified within the ICCZ. This will support differing outcomes at a more detailed level as development responds to the functional requirements of internal uses – especially at street level. Whilst the proposed rules, the ICFZ is likely to facilitate more development that is predominantly residential in nature, whereas development in the ICCZ is likely to tend more towards development with a retail/ commercial focus with potential for upper-level residential uses. In addition, development within the ICFZ has increased flexibility in terms of building design and layout so it is anticipated you would have some increasing variety in building form and street edge condition.

Attachment 1 – Nelson Walking Catchments




Suburban Commercial
Walking_Catchments
400m
800m
1200m
Catchment_Origins
Rocks Road
Princess Drive
Monterey Avenue
Bisley Walk
State Highway 6
Bisley Avenue
Hounsell Crescent
Moana Avenue
Beach Road
Mirirai Street
Tahuhanui Drive
Stanaway Avenue
Emano Street
Parkers Road
Golf Road
Polo Street
Tamaki Street
Toroa Street
Green Street
Toswill Road
Otaroa Street
Golf Road
Rangiora Terrace
Kauroa Way
Chamberlain Lane


State Highway 6 - Whakatu Drive
Waimea Road
Exeter Street
Ferguson Street
Point Road
Alport Place
Norwich Street
Seaview Road
Leicester Street
Blacklow Avenue
Neale Avenue
Araiki Road
Austen Ward Heights
The Ridgeway
Kaka Street
Maitland Avenue
Aldinga Avenue
Curtis Street
Andrew Street
Neyland Road
Songer Street
Marsden Road
Tyree Drive
Tennyson Crescent
Marlowe Street
Panorama Drive
Monaco View
Hammill Grove
Main Road Stoke
Ranui Road
Tiraki Street
Marsden Valley Road
Masefield Street
McMahon Street
Polstead Road
Karaka Street
Echodale Place
Manson Avenue
Somerset Terrace
Packham Crescent
Suffolk Road

Daylight Admission Controls Considered for MDRZ and HDRZ (20m site width)

