

Received: 30/09/23

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

5851

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

Submitter:
Full Name: Stephen Gandy
Address:

Telephone: 5487678
Email:

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

I OPPOSE the Plan Change; and particularly the following

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

I SEEK the following decision from the Council

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

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

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

Other comments or concerns I have about Plan Change 29

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

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

S. M. Gandy
Submitter

03.09.23
Date

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

Tuesday 19th September

NPOCS - 539570224 - 18071

Received: 30/10/23

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

5852

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: Full Name: John Gibson Address: Telephone: Email: johnbeuparapara@xtra.co.nz
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..... Gibson
Submitter

.. 28.10.23
Date

NB: TO BE DELIVERED TO NCC OR SENT TO environmental.planning@ncc.govt.nz by 4.00 pm
Tuesday 19th September

NDOC5 - 539570224 - 18073

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: <u>Beverley Gibson</u> Full Name: Address: Telephone Email: <u>john.beu para para@extra.co.nz</u>
--	--

5853



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



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

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

.....B Gibson.....
 Submitter

.....28/8/23.....
 Date

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

Tuesday 19th September

NCCS - 5395 70224 - 18075

Received: 30/10/23

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: Full Name: <i>Craig Moore</i> Address: _____ Telephone: _____ Email: <i>Craig_216@hotmail.com</i>
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5854

2005-539570224-18077

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

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Other comments or concerns I have about Plan Change 29

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

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

[Signature]
.....
Submitter

28 August 2023
.....
Date

**NB: TO BE DELIVERED TO NCC OR SENT TO environmental.planning@ncc.govt.nz by 4.00 pm
Tuesday 19th September**

Received: 30/10/23

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: Full Name: <u>Tracy Farrell & David Tyree</u> Address: Telephone: Email: <u>tyree.farrell@gmail.com</u>
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S855.

N2025 - 539570224 - 18079

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

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Other comments or concerns I have about Plan Change 29

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Tracy Farrell
.....
Submitter

30/10/23
.....
Date

NB: TO BE DELIVERED TO NCC OR SENT TO environmental.planning@ncc.govt.nz by 4.00 pm
Tuesday 19th September

Received: 30/10/23

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

TO: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 NELSON 7040	Submitter: Full Name: <u>Pamela Gay Goodin</u> Address: Telephone: Email: <u>Davidandpam.dlb@gmail.com</u>
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5856

27065-539570224-18090



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



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

I OPPOSE the Plan Change; and particularly the following

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

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

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

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

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

Other comments or concerns I have about Plan Change 29

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

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

Submitter signature P Goodin

Date 30/10/2023

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

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

TO: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 NELSON 7040	Submitter: Full Name: <u>Robert Martin</u> Address: Telephone: Email: <u>n2dahug@gmail.com</u>
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S857

NDOS - 539570224 - 18093



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



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

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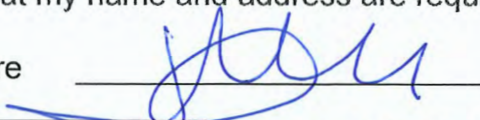
For further in-depth information please refer to our neighbourhood group submission.

Other comments or concerns I have about Plan Change 29

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

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

Submitter signature



Date

25/10/2023

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

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

Sub No: S858

DOCS-539570224-18094

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: <i>Catherine Hughson</i> Full Name: <i>Catherine Gale Hughson</i> Address: Telephone: Email: <i>cyhughson@gmail.com</i>
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- ☒ I could not obtain an advantage in trade competition through this Submission.
☒ I wish to be heard in support of my Submission at the Council Hearing.

I OPPOSE the Plan Change; and particularly the following

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Other comments or concerns I have about Plan Change 29

I have concerns as to the lack of oversight by council into the design and layout of the city. Council has taken a blanket free for all approach that has the potential to destroy the unique character of Nelson. In my opinion a staged programme of development should be used. Older areas such as Kawai, Tipahi St Karaka St area should be in a 10 year plan, staggered development of older cheaper housing areas.

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

Staged development of older areas particularly those already areas already providing social housing.
 Large housing blocks orientated in a North/South aspect creating less light impact.
 Requirement for higher blocks to back onto a street - not close to neighbours or industrial area

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

pTo
additional
page.

Cy Hughson
.....
Submitter

..31/10/2023.
Date

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

Tuesday 19th September

Further to my submission to P.C. 29,

I also wish to express disappointment with the presentation of plan change 29 by council. A 2000 page legal document is not the way to go out to consultation with the public. Council should have been able to produce a concise document to go out to all residents including detailing points as to how council own urban planning rules would work to mitigate some of the worst effects on residents lives if a multistory building was to be built in close vicinity to their home.

Lack of oversight into Nelson city urban planning is already apparent with newly built homes being destroyed in slips and flooding in 2022 because council has allowed developers to put them in unsuitable places.

It concerns me that lack of planning standards and organizing urban laws will lead to further poor outcomes by unscrupulous developers maximising profit over quality of design and build. NCC also should have identified areas within Nelson that have older houses that are going to be in need of replacement and prioritising those areas for development first. The current proposal allows for an informal design that has the potential to destroy the appeal of multiple newer areas that people have invested heavily into.

The concerns that I would like addressed by council in a concise readable document supplied to all house holds before this plan change is approved are as follows.

- how light shading to existing properties is to be managed. If a home owner has gone to expense of trying to become more self sufficient by installing solar panels, is their right to gain sunlight going to be removed without redress. If a house that was warm in the winter and then becomes shaded and cold, this then has an effect on the residents health and well being. Is their existing right going to be ignored to benefit the profitability of a developer.
-
- Are developers going to be compelled by NCC to build structures that are in fitting with the design and quality of builds around them?
-
- Poor planning leading to lack of basic infrastructure, services and contributing to social problems. Also pressure on existing environments in terms of parking, reduced living space, noise creation, pressure on existing natural environments.
- I oppose six story high buildings in the Stoke commercial area. They are oppressive and will alter the character of the area where a lot of vulnerable elderly live because it is a smaller center. Too much intensification allowed by six story buildings will destroy the current 'village' feel of this community.

CG Hughson.

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

TO: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 NELSON 7040	Submitter: <u>Diane Varey</u> Full Name: <u>Diane Helen Varey</u> Address: _____ Telephone: _____ Email: <u>diane.hvarey@gmail.com</u>
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S859.

NDCS-539570224-18097

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

☐ I wish to be heard in support of my Submission at the Council Hearing
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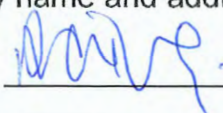
For further in-depth information please refer to our neighbourhood group submission.

Other comments or concerns I have about Plan Change 29

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

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

Submitter signature



Date

26/10/23

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

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

Received: 30/10/23

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: Full Name: <u>STEPHANIE JANE STRAWBRIDGE</u> Address: Telephone: Email: <u>stephaniestrawbridge77@gmail.com</u>
--	--



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

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

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Stephanie Jane Strawbridge
 Submitter

9-10-23
 Date

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

Tuesday 19th September

NDCS - 539570224 - 18105

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

Submitter:**Full Name:** Carolyn Anne Sygrove**Address:****Telephone:****Email:** caroandrich31@gmail.com**Signature of Submitter:****Date:** 31/10/23

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

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

Introduction

I settled in Nelson with my husband in 1992 after several years living and working overseas. We bought our first home, 12 Brook Street the following year and our two children were born here and attended the local schools. We bought our second house (where we currently reside) in 1999 and have run a small B & B business from our home since 2000. We understand what attracts people to Nelson, both as residents and visitors. The climate, the outdoor activities, the picturesque coastline, and the Heritage buildings that give character to the city and surrounds. So many of our B & B guests from within NZ and overseas comment on our Heritage street and the beautiful historic houses in and around the city. They comment on how lucky we are that these houses have been preserved and cherished. I share that sentiment. Nelson has a "look and a feel" that is unique. It is a big drawcard for tourists and one of the reasons we came to live here ourselves. I have put my name to the Seymour Avenue Heritage Precinct Group Submission to address the issues pertaining directly to our Heritage Precinct. This submission is my personal one which looks at the city and region as a whole.

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

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

- a) That I have found it difficult to digest the total effect of the proposed PC 29 and its supporting documentation due to its size and complexity.
- b) That access to a paper copy of PC 29 and the Section 32 reports has not been made available for residents who do not have access to, or the ability to use a computer.
- c) That I have found PC 29 lack of early public engagement and consultation by Council, with its severe implications towards the well-being of existing rate paying residents enjoyment of their properties, extremely stressful and unnecessary.

- d) That I have been put in a position of hoping more qualified citizens than I, will make more comprehensive submissions covering my concerns as to the future of Nelson and its rate paying residents.
- e) That Council Planning Staff have stated at numerous meetings “This is a ‘Broad Brush approach’ that requires public submissions to refine the plan”. Such a statement implies PC 29 has been prematurely put out for public submissions in an incomplete and inaccurate state that requires the public to learn and understand its entirety, so they can re-design it.
 - i) I am asking Council to withdraw PC 29 and get Council Planning staff to refine the plan design and then put it back out for public submissions.

2) Hearing Panel

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

3) NCC’s Population forecasts

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

4) Design Lead and Not Developer Lead Growth.

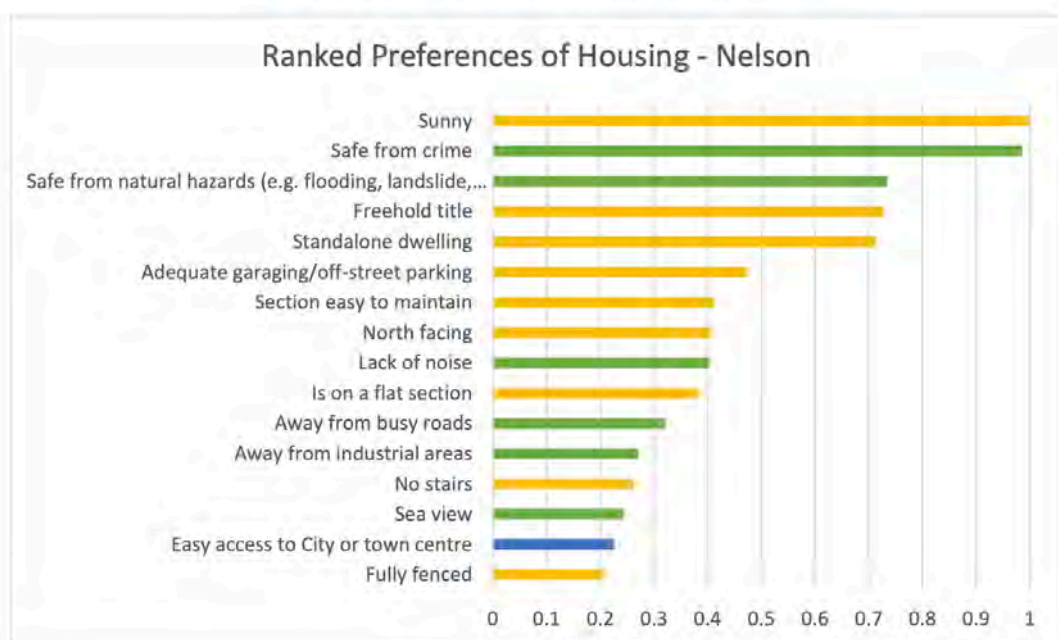
- a) Nelson is a very special and unique place that needs to be protected. It is unlike any other district in NZ. It includes a ‘Low Rise’ City with a collection of heritage and non-heritage character buildings that have attracted people for generations and have been a cherished holiday destination for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

- f) I ask the Council to create a broader level of protection for neighbourhoods beyond the heritage buildings and precincts that still have historic character value from the early settlement years of Nelson.
- i) I ask the Council to appoint an Urban Development Agency (UDA) to carefully guide growth and actively facilitate the emergence of cohesive urban neighbourhoods with a variety of high-quality housing choices.

5) Sunlight Recession Planes and Shading Effects

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

Figure 4.9: Ranked Preferences of Housing – Nelson Urban



- b) TDC even 'Encourage the Sun into your home'. See <https://www.tasman.govt.nz/my-property/building-and-alteration/heating-and-insulation/energy-efficiency-and-heating-your-home/>
- c) Solar panels on our homes are beneficial for the environment as well as taking the drain off our national grid. Nelson is particularly suited to solar energy production which adds weight to ensuring people's houses are not shaded by new builds. I ask the council to ensure this is a non-negotiable clause for all future intensification.
- d) All existing houses built prior to and under the current daylight admission rules will be subjected to the loss of sunlight amenity under PC29 with the following effects: -
 - 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 exacerbated due to a large portion of Nelson housing being old, with un-insulated walls and single glazing.

- 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 be able to afford to heat their homes.
 - vii) Property owners will be reluctant to invest in making additional new (low rise) infill improvements on their section, with affordable additional units that **COULD** be over shadowed and devalued by a wealthier developer who could afford to build a multi-storey development next door at any time in the future.
- (1) I ask the Council to maintain the AP15 Daylight Admission protection rules to all pre-existing properties, unless the owner gives written approval to the contrary.
 - (2) I strongly support the inclusion of Daylight and Sunlight policy statement Para RE2.3.i: The reception of daylight and sunlight to each household unit is a critical component of residential amenity that provides warmth and energy efficiency, and is vital for outdoor activities such as gardening and recreation. To ensure shading effects are minimised, and to ensure there is sufficient space around buildings to allow the admission of sunlight to the site, this Plan has provided for daylight controls on all side and rear boundaries. The policy also applies to larger non-residential buildings such as schools or halls. The basic premise is that the daylight and sunlight received on a residential site should be no different whether or not the neighbour is residential. This philosophy applies whether the building is on an adjoining site or across a street.

6) Privacy and Outlook

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

7) Intensification

- a) I strongly oppose the High-Density Residential Zone. It is by no way in character or in keeping with any existing 'Low Rise' Nelson residential suburb and beyond the MDS legal mandate.
 - i) I ask Council to remove HDRZ from the plan completely.
 - ii) I ask Council to apply the new General Residential Zone equally across the entire Nelson district on the introduction of PC29, on the basis that AP15 Daylight Admission protection rules will apply to all pre-existing properties, unless the owner gives written approval to the contrary.
- b) I am strongly opposed to all new 'Green Field' developments being used for only single storey dwellings as it is a complete underutilisation of land that can accommodate increased intensification.
 - i) I ask Council to ensure a minimum of two storey dwellings be built on all new green field developments. Eg Golden Elms in Toi Toi, Ngawhatu Valley and Marsden Valley.
- c) Building holiday apartments that sit empty for long periods, does not solve our intensification, growth and affordability dilemma, and yet it locks up our valuable housing resource. Eg Rocks & Haven Road has many empty apartments.
 - i) I ask Council to consider solutions to mitigate against new-build empty holiday apartments.

- d) I oppose the increase of residential units beyond 4, as a **restricted discretionary** activity that does ***NOT*** require notification and written approval from neighbours.
 - i) I ask Council to ensure that more than 4 units requires notification, to restrict large 'out of character' accommodation blocks spanning multiple sections, and taking up lots of on street car parking spaces, popping up in a residential street, without warning.
- e) Bigger older properties, could be better utilised and help with our growth if they were more easily allowed to be divided into multi-dwellings.
- f) Building inner city apartments that offer an alternative solution to 'retirement villages', can free up the bigger homes for new families to occupy. The 'retired' occupants may also be less likely to be reliant on a vehicle, which may more closely suit the growth model desired.
- g) Designing Inner-City roof gardens and balconies with green spaces for commercial hospitality use or places for apartment living residents to relax and enjoy the Nelson Sun.
- h) Incentivise rate paying residents to demolish or relocate their house in favour of replacing more units on the same section providing they comply with the suitable character or heritage of the neighbourhood.

8) Progressively Phased Intensification

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



9) Intensification in hazard zones

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

10) On-street car parking

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

11) Social Housing

- a) Significant care and attention must be considered with all social housing because there are too many examples across the country where this has resulted in disharmony in communities.
- b) High density living for the homeless and vulnerable will not result in healthy outcomes for all concerned.

- c) Careful design controls from the concept stage onwards, will be rewarded in the long run, with less support required by Mental Health Services, Charity Services, Police and Social Services.
- i) I would like to see Council working closely with Kainga Ora, to provide a 'transparent' way of creating new Social Housing Developments that 'Fit' with the long-term design vision of Nelson.
- ii) I would like to see Council have more fit for purpose controls for antisocial behaviour that affects the existing neighbour's enjoyment of their property.

12) Infrastructure

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

13) Problems and Solutions

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

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

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

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



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

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Summary

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

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

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

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

Funding National Institute for Health and Care Research Public Health Research programme.

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Introduction

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

There are inequalities in the distribution and accessibility of high-quality GBS. People in deprived areas, those from minority ethnic communities, older adults, and those with longstanding health conditions or functional limitations often have less physical access to good-quality GBS.⁵ These groups also tend to use GBS less and are more likely to have negative perceptions regarding their usage and the safety of such spaces.⁶ There is evidence suggesting associations between GBS exposure and reductions in health inequalities, both cross-sectional and longitudinal.^{7–11} Smaller-scale longitudinal studies in the UK also suggest associations between greater GBS exposure and better mental health and wellbeing,¹² but some have been restricted to urban areas and used GBS exposures at the area level rather

Lancet Planetary Health

2023; 7: e809–818

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Research in context

Evidence before this study

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

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

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

Added value of this study

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

Implications of all the available evidence

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

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

This study analysed the effect of accrued household ambient greenness and availability of GBS over time on subsequent adult mental health, explicitly considering health inequalities and disentangling the mental health benefits of GBS from living in greener areas. We did this by anonymously tracking individuals over time and allocating GBS exposures at the more granular household, rather than small-area, level. Many previous studies measured green space exposure across small areas at a single time point, assuming the amount of vegetation did not vary within these areas or change through time.^{16–18} Apart from a few quasi-experimental studies in which people were allocated to social housing units with different levels of surrounding green space,⁷ results of place-based interventions investigating health effects using small areas might have recorded the

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

Methods

Study design and data sources

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

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

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

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

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

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

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

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

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

See Online for appendix

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

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

Table 1: Summary of green and blue space exposure metrics

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

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

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

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

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

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

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

Procedures

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

Statistical analysis

The cohort contained 2341591 adults and 19141896 person-years of follow-up data. We used multivariate logistic regression to assess associations between normalised time-aggregated ambient greenness (average EVI within a 300 m buffer from home), and access measures (total number of GBS, or distance to nearest GBS, within 1600 m of the home), with having a subsequent CMD. We stratified by deprivation and historical CMD diagnosis (pre-cohort entry) to assess effect modification. We normalised EVI and GBS access to between 0 and 1. Regression results are presented for increments of 0.1 units. In our regression analyses, we adjusted for rurality when investigating associations between ambient greenness and CMD. We did not adjust for rurality when investigating associations between GBS access and CMD because the spaces that characterise rural areas, such as farmland, which is not accessible to the public, were excluded from the overall GBS measure. Predicted probabilities were calculated from the adjusted regression models to illustrate how the probability of CMD varied with differences in GBS exposure or access, keeping all other variables constant.

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

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

Role of the funding source

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

	Adults		Common mental health disorder*		Ambient greenness		Potential to access GBS: number of GBS	
	n	%	n	%	Mean	SD	Mean	SD
Total	2341591	100%	513239	21.9%	0.29	0.09	441.58	340.72
Age group, years								
16–21	363314	15.5%	70282	19.3%	0.30	0.10	491.82	392.31
22–30	385643	16.5%	102992	26.7%	0.26	0.09	523.48	408.53
31–40	327874	14.0%	87550	26.7%	0.27	0.09	453.19	332.24
41–50	338303	14.4%	88904	26.3%	0.29	0.09	412.64	298.63
51–60	302774	12.9%	67545	22.3%	0.30	0.09	401.53	296.20
61–70	284096	12.1%	47105	16.6%	0.30	0.09	382.49	285.34
71–80	201279	8.6%	30401	15.1%	0.30	0.09	395.23	290.27
>80	138308	5.9%	18460	13.3%	0.28	0.09	401.08	301.52
Sex								
Male	1193240	51.0%	205546	17.2%	0.29	0.09	440.58	337.83
Female	1148351	49.0%	307693	26.8%	0.29	0.09	442.62	343.69
Birth in household								
No	2076801	88.7%	460262	22.2%	..	..	..	..
Yes	264790	11.3%	52977	20.0%	..	..	..	..
Death in household								
No	2151488	91.9%	489243	22.7%	..	..	..	..
Yes	190103	8.1%	23996	12.6%	..	..	..	..
WIMD quintile								
1—most deprived	473404	20.2%	131843	27.8%	0.25	0.08	495.13	253.75
2	462492	19.8%	110898	24.0%	0.27	0.08	443.93	291.10
3	480278	20.5%	98673	20.5%	0.30	0.10	413.21	347.62
4	445002	19.0%	83768	18.8%	0.31	0.11	405.72	401.33
5—least deprived	480415	20.5%	88057	18.3%	0.29	0.08	448.14	382.03
Moved home								
Did not move	1439204	61.5%	343734	23.9%	0.29	0.10	446.32	334.40
Moved once	520509	22.2%	99694	19.2%	0.29	0.10	432.63	360.11
Moved more than once	381878	16.3%	69811	18.3%	0.28	0.09	435.91	335.67
Rurality								
Urban	1611516	68.8%	365931	22.7%	0.25	0.07	554.64	346.99
Rural	354961	15.2%	62285	17.5%	0.41	0.09	162.60	115.21
Town and fringe	375114	16.0%	85023	22.7%	0.31	0.07	219.84	130.79

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

Table 2: Characteristics of cohort members including GBS exposure

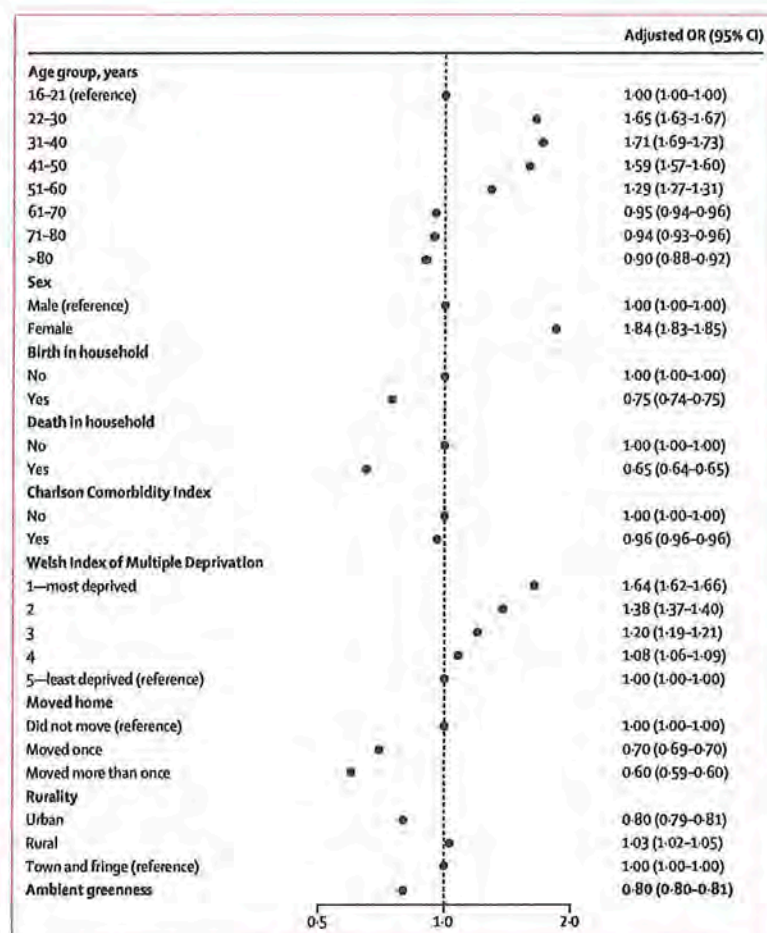


Figure 1: Factors associated with risk of CMD, including mean ambient greenness
CMD=common mental health disorders. OR=odds ratio. Association with CMD is after adjustment for other variables listed. The results in each category of each factor show the adjusted OR of CMD compared to the reference category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

Results

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

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

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

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

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

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

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

Discussion

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

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

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

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

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

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

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

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

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

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

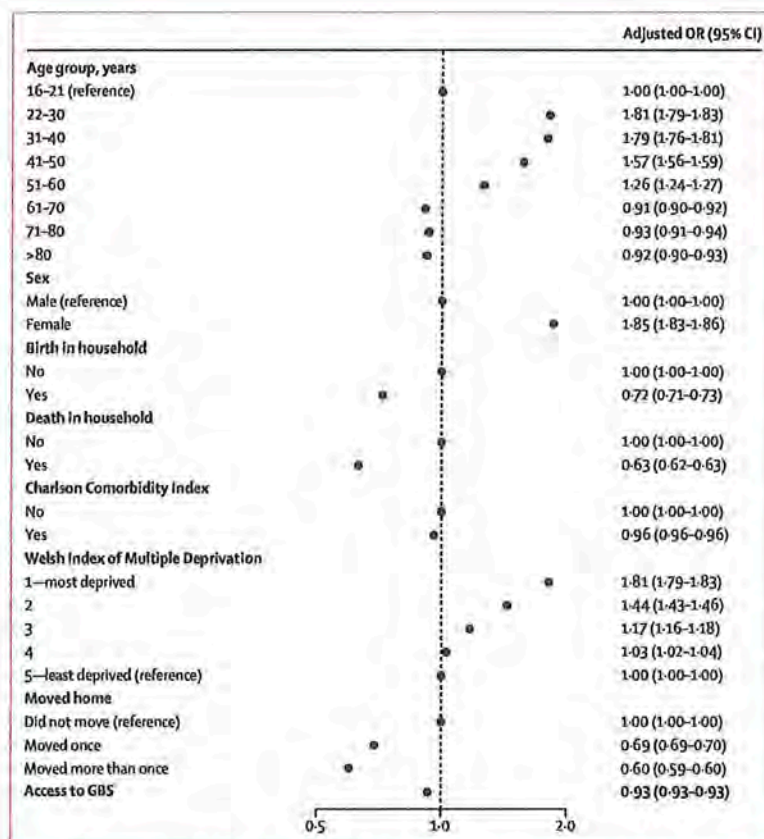


Figure 2: Factors associated with risk of CMD, including access to GBS

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

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

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

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

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

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

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

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

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

Contributors

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

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

Data sharing

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

Declaration of interests

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

Acknowledgments

This project was funded by the NIHR Public Health Research programme (project number 16/07/07). Time for SER to contribute to this project was funded by the NIHR Applied Research Collaboration North West Coast. We thank Roberto Villegas-Diaz for drawing the forest plots.

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

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

Introduction

I settled in Nelson with my wife in 1992 after several years living and working overseas. We bought our first home, 12 Brook Street the following year and our two children were born here and attended the local schools. We bought our second house (where we currently reside) in 1999 and have run a small B & B business from our home since 2000. We understand what attracts people to Nelson, both as residents and visitors. The climate, the outdoor activities, the picturesque coastline, and the Heritage buildings that give character to the city and surrounds. So many of our B & B guests from within NZ and overseas comment on our Heritage street and the beautiful historic houses in and around the city. They comment on how lucky we are that these houses have been preserved and cherished. I share that sentiment. Nelson has a "look and a feel" that is unique. It is a big drawcard for tourists and one of the reasons we came to live here ourselves. A Seymour Avenue Heritage Precinct Group Submission has been submitted on my behalf to address the issues pertaining directly to our Heritage Precinct. This submission is my personal one which looks at the city and region as a whole.

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

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

- a) That I have found it difficult to digest the total effect of the proposed PC 29 and its supporting documentation due to its size and complexity.
- b) That access to a paper copy of PC 29 and the Section 32 reports has not been made available for residents who do not have access to, or the ability to use a computer.

- c) That I have found PC 29 lack of early public engagement and consultation by Council, with its severe implications towards the well-being of existing rate paying residents enjoyment of their properties, extremely stressful and unnecessary.
- d) That I have been put in a position of hoping more qualified citizens than I, will make more comprehensive submissions covering my concerns as to the future of Nelson and its rate paying residents.
- e) That Council Planning Staff have stated at numerous meetings "This is a 'Broad Brush approach' that requires public submissions to refine the plan". Such a statement implies PC 29 has been prematurely put out for public submissions in an incomplete and inaccurate state that requires the public to learn and understand its entirety, so they can re-design it.
 - i) I am asking Council to withdraw PC 29 and get Council Planning staff to refine the plan design and then put it back out for public submissions.

2) Hearing Panel

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

3) NCC's Population forecasts

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

4) Design Lead and Not Developer Lead Growth.

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

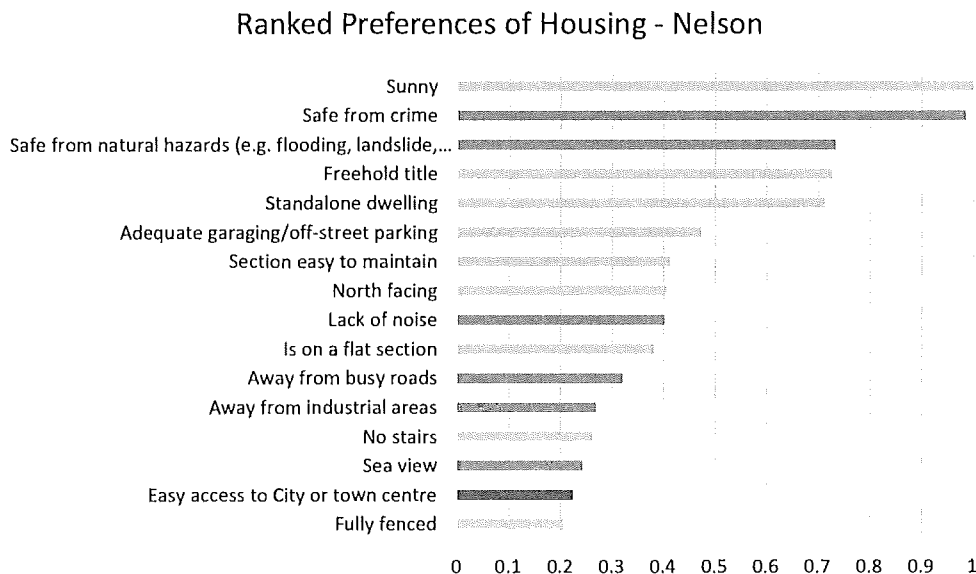
have a very positive affect on mental health, both for residents and people travelling through these areas. (See Lancet Study; PDF attached)

- f) I ask the Council to create a broader level of protection for neighbourhoods beyond the heritage buildings and precincts that still have historic character value from the early settlement years of Nelson.
- i) I ask the Council to appoint an Urban Development Agency (UDA) to carefully guide growth and actively facilitate the emergence of cohesive urban neighbourhoods with a variety of high-quality housing choices.

5) Sunlight Recession Planes and Shading Effects

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

Figure 4.9: Ranked Preferences of Housing – Nelson Urban



- b) TDC even 'Encourage the Sun into your home'. See <https://www.tasman.govt.nz/my-property/building-and-alteration/heating-and-insulation/energy-efficiency-and-heating-your-home/>
- c) Solar panels on our homes are beneficial for the environment as well as taking the drain off our national grid. Nelson is particularly suited to solar energy production which adds weight to ensuring people's houses are not shaded by new builds. I ask the council to ensure this is a non-negotiable clause for all future intensification.
- d) All existing houses built prior to and under the current daylight admission rules will be subjected to the loss of sunlight amenity under PC29 with the following effects: -
 - 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 exacerbated due to a large portion of Nelson housing being old, with un-insulated walls and single glazing.
- 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 be able to afford to heat their homes.
- 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 overshadowed and devalued by a wealthier developer who could afford to build a multi-storey development next door at any time in the future.
 - (1) I ask the Council to maintain the AP15 Daylight Admission protection rules to all pre-existing properties, unless the owner gives written approval to the contrary.
 - (2) I strongly support the inclusion of Daylight and Sunlight policy statement Para RE2.3.i: The reception of daylight and sunlight to each household unit is a critical component of residential amenity that provides warmth and energy efficiency, and is vital for outdoor activities such as gardening and recreation. To ensure shading effects are minimised, and to ensure there is sufficient space around buildings to allow the admission of sunlight to the site, this Plan has provided for daylight controls on all side and rear boundaries. The policy also applies to larger non-residential buildings such as schools or halls. The basic premise is that the daylight and sunlight received on a residential site should be no different whether or not the neighbour is residential. This philosophy applies whether the building is on an adjoining site or across a street.

6) Privacy and Outlook

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

7) Intensification

- a) I strongly oppose the High-Density Residential Zone. It is by no way in character or in keeping with any existing 'Low Rise' Nelson residential suburb and beyond the MDS legal mandate.
 - i) I ask Council to remove HDRZ from the plan completely.
 - ii) I ask Council to apply the new General Residential Zone equally across the entire Nelson district on the introduction of PC29, on the basis that AP15 Daylight Admission protection rules will apply to all pre-existing properties, unless the owner gives written approval to the contrary.
- b) I am strongly opposed to all new 'Green Field' developments being used for only single storey dwellings as it is a complete underutilisation of land that can accommodate increased intensification.
 - i) I ask Council to ensure a minimum of two storey dwellings be built on all new green field developments. Eg Golden Elms in Toi Toi, Ngawhatu Valley and Marsden Valley.
- c) Building holiday apartments that sit empty for long periods, does not solve our intensification, growth and affordability dilemma, and yet it locks up our valuable housing resource. Eg Rocks & Haven Road has many empty apartments.

- i) I ask Council to consider solutions to mitigate against new-build empty holiday apartments.
- d) I oppose the increase of residential units beyond 4, as a **restricted discretionary** activity that does ***NOT*** require notification and written approval from neighbours.
 - i) I ask Council to ensure that more than 4 units requires notification, to restrict large 'out of character' accommodation blocks spanning multiple sections, and taking up lots of on street car parking spaces, popping up in a residential street, without warning.
- e) Bigger older properties, could be better utilised and help with our growth if they were more easily allowed to be divided into multi-dwellings.
- f) Building inner city apartments that offer an alternative solution to 'retirement villages', can free up the bigger homes for new families to occupy. The 'retired' occupants may also be less likely to be reliant on a vehicle, which may more closely suit the growth model desired.
- g) Designing Inner-City roof gardens and balconies with green spaces for commercial hospitality use or places for apartment living residents to relax and enjoy the Nelson Sun.
- h) Incentivise rate paying residents to demolish or relocate their house in favour of replacing more units on the same section providing they comply with the suitable character or heritage of the neighbourhood.

8) Progressively Phased Intensification

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



9) Intensification in hazard zones

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

10) On-street car parking

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

11) Social Housing

- a) Significant care and attention must be considered with all social housing because there are too many examples across the country where this has resulted in disharmony in communities.

- b) High density living for the homeless and vulnerable will not result in healthy outcomes for all concerned.
- c) Careful design controls from the concept stage onwards, will be rewarded in the long run, with less support required by Mental Health Services, Charity Services, Police and Social Services.
 - i) I would like to see Council working closely with Kainga Ora, to provide a 'transparent' way of creating new Social Housing Developments that 'Fit' with the long-term design vision of Nelson.
 - ii) I would like to see Council have more fit for purpose controls for antisocial behaviour that affects the existing neighbour's enjoyment of their property.

12) Infrastructure

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

13) Problems and Solutions

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

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

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

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

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

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Summary

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

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

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

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

Funding National Institute for Health and Care Research Public Health Research programme.

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Introduction

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

There are inequalities in the distribution and accessibility of high-quality GBS. People in deprived areas, those from minority ethnic communities, older adults, and those with longstanding health conditions or functional limitations often have less physical access to good-quality GBS.⁵ These groups also tend to use GBS less and are more likely to have negative perceptions regarding their usage and the safety of such spaces.⁶ There is evidence suggesting associations between GBS exposure and reductions in health inequalities, both cross-sectional and longitudinal.^{7–11} Smaller-scale longitudinal studies in the UK also suggest associations between greater GBS exposure and better mental health and wellbeing,¹¹ but some have been restricted to urban areas and used GBS exposures at the area level rather

Lancet Planetary Health
2023;7:e809–18
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Research in context

Evidence before this study

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

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

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

Added value of this study

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

Implications of all the available evidence

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

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

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

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

Methods

Study design and data sources

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

Health Service (NHS) general practitioner (GP) in Wales. This dataset includes addresses provided by patients with from-to dates of residency in each home (updated when patients informed their GP they moved home, or changed GP), used to calculate residency dates in each home and house moves.³⁰ All household members aged 16 years or older were included in the cohort, with individuals nested within each household. The Welsh Demographic Service Dataset contains demographic characteristics of all people registered with an NHS GP in Wales that is free at the point of care, who provides data to the Secure Anonymised Information Linkage (SAIL) Databank unless individuals have requested to opt out (80% population coverage³¹). Thus, using these routinely collected data provides a largely inclusive population dataset most suitable to apply a health equity lens.

The cohort was linked to data from GP records (to derive the common mental health disorders [CMD] outcome), the Annual District Death Extract from the Office for National Statistics mortality register (for censoring), the Welsh Index of Multiple Deprivation (WIMD 2011 applied up to 2014 and WIMD 2014 applied from 2014), and rural-urban Office for National Statistics classifications for Lower Layer Super Output Areas.³² These data were available in the SAIL Databank, an anonymised data safe haven.

We created one measure of household ambient greenness (within 300 m radius) and two of local GBS access (within a 1600 m footpath or road-accessible network buffer; table 1). Ambient greenness was measured, reflecting the density of vegetation using a validated measure called the Enhanced Vegetation Index (EVI), which has the advantage over normalised difference vegetation index of optimising the vegetation signal and reducing atmospheric noise. The substantial topographical variation in our study area (Wales, UK) made EVI the most appropriate measure as it is less susceptible to the effects of topographic seasonal factors. We calculated this within 300 m of each home in Wales. Based on earlier work, we hypothesised that some benefits of exposure to greenness will be gained without necessarily having to physically visit GBS (reduced noise, green views, etc). This measure captures the presence of green space (eg, parks, domestic gardens) and other green infrastructure (eg, street trees, green roofs). The ambient greenness measure was derived from satellite data (Landsat 2008–2019).³³ We selected images from springtime to minimise the number of poor-quality images due to cloud cover. Cloud-free images taken between May and July were downloaded for each year. We applied the Dark Object Subtraction 1 atmospheric correction method to each image as recommended by Young and colleagues³⁴ and calculated the EVI for each image using the vegetation index GRASS tool in QGIS.³⁵ We also created cloud masks for each image using the Cloud Masking for Landsat Products plugin.³⁶ We used the cloud masks to set pixels

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

The primary GBS access metric estimated the potential access to GBS (eg, park, woodland, lake, river) within 1600 m (approximately 1 mile) of the home. The 1600 m cutoff was informed by the Monitor of Engagement with the Natural Environment survey, which indicated that this is the distance within which a rapid decline in greenspace use is reported.³⁷ We created two access measures: the first counted the numbers of GBS, and the second was the distance to the nearest GBS. Both measured potential access to GBS within 1600 m of the home and were generated from a combination of the Ordnance Survey MasterMap Topography Layer (2018) to capture natural and human-made features, including the outline of homes and parks, and Ordnance Survey Greenspace dataset (2018).³⁸ These data were augmented with local authority technical advice notes (TAN 16), containing legally mandated data on sport, recreation, and open spaces managed by local authorities; open-source portal data (forestry or urban tree cover, publicly available at DataMapWales); and OpenStreetMap road and footpath data.³⁹ Although farmland constitutes large areas in rural regions, this is privately owned land. We were unable to obtain data on rights of way in rural areas and therefore excluded privately owned farmland, which might have included sections that are publicly accessible. We only included publicly accessible green spaces (and therefore excluded farmland from our GBS access measures) because our aim was to provide evidence on modifiable aspects of the built and natural environment for planning and policy guidelines.

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

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

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

See Online for appendix

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

Table 1: Summary of green and blue space exposure metrics

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

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

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

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

Covariates included a binary measure of sex as recorded in each individual's electronic health record from the Welsh Demographic Service Dataset (hereafter referred to as male [reference] or female), age group (categorised as 16–21 [reference], 22–30, 31–40, 41–50, 51–60, 61–70, 71–80, and 80 years or older), area-level socioeconomic deprivation (quintiles of the full WIMD score, with least deprived as the reference), home moves (yes, one, more than one), birth(s) in household (yes, no), death(s) in household (yes, no), and urban or rural category (village, hamlet, and isolated dwellings; town and fringe; or urban conurbation >10 000 population), defined using Office for National Statistics settlement type categories.²⁴ The full WIMD score was used in analyses, as this is the Welsh Government's official measure of relative deprivation for small areas in Wales. It identifies areas with the highest concentrations of several different types of deprivation. WIMD is calculated for all small areas (Lower Layer Super Output Areas) in Wales. Following the 2011 Census, 1909 Lower Layer Super Output Areas were defined in Wales with an average population of 1600 people. The methodology used within WIMD 2014 is the same as used for WIMD 2011.³¹ For each individual, covariates were derived from data in the same time interval as the environmental measures. This included all quarters up to and including that before a CMD was recorded, or the individual moved out of Wales, or the cohort end in 2019. Data on sex were extracted from NHS electronic health records and so are likely to reflect participants' sex

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

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

Procedures

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

Statistical analysis

The cohort contained 2 341 591 adults and 19141896 person-years of follow-up data. We used multivariate logistic regression to assess associations between normalised time-aggregated ambient greenness (average EVI within a 300 m buffer from home), and access measures (total number of GBS, or distance to nearest GBS, within 1600 m of the home), with having a subsequent CMD. We stratified by deprivation and historical CMD diagnosis (pre-cohort entry) to assess effect modification. We normalised EVI and GBS access to between 0 and 1. Regression results are presented for increments of 0.1 units. In our regression analyses, we adjusted for rurality when investigating associations between ambient greenness and CMD. We did not adjust for rurality when investigating associations between GBS access and CMD because the spaces that characterise rural areas, such as farmland, which is not accessible to the public, were excluded from the overall GBS measure. Predicted probabilities were calculated from the adjusted regression models to illustrate how the probability of CMD varied with differences in GBS exposure or access, keeping all other variables constant.

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

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

Role of the funding source

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

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

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

Table 2: Characteristics of cohort members including GBS exposure

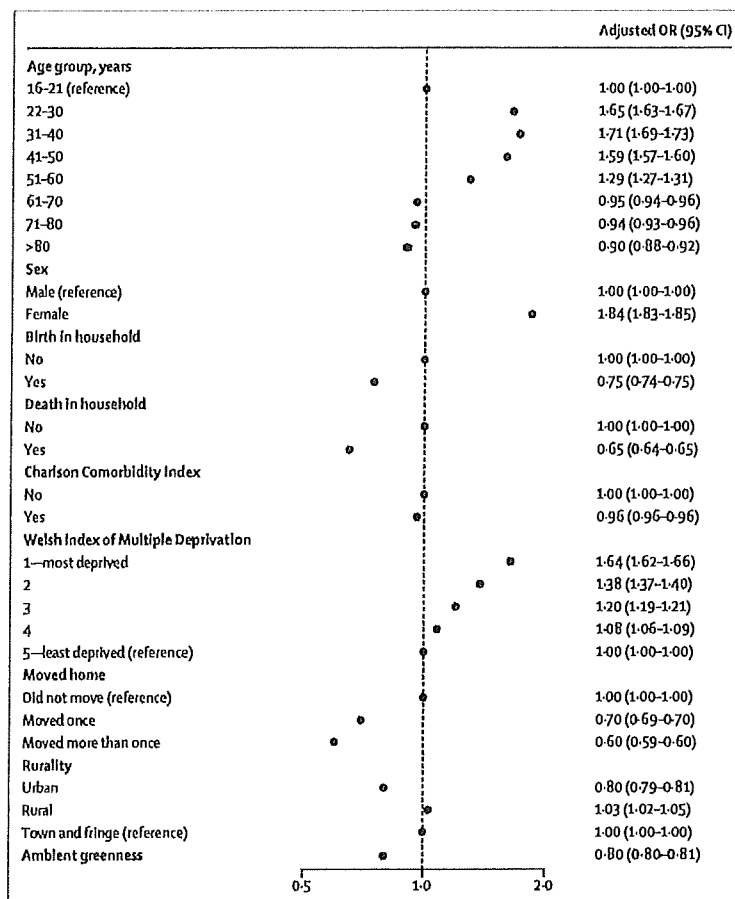


Figure 1: Factors associated with risk of CMD, including mean ambient greenness
 CMD=common mental health disorders. OR=odds ratio. Association with CMD is after adjustment for other variables listed. The results in each category of each factor show the adjusted OR of CMD compared to the reference category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

Results

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

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

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

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

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

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

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

Discussion

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

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

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

Household-level metrics of ambient greenness exposure and potential access to GBS were derived and linked at a granular spatial resolution, thereby reducing spatial smoothing and ecological fallacy. These occur when data are aggregated over larger statistical areas and can introduce biases to the extent that the direction of associations are reversed. We used data linkage to nest people in their homes and to capture their immediate environment centred on their home. Our privacy-protecting data linkage mechanisms made it possible to link health and environment data at the same spatial and temporal scales, enabling a more robust exploration of the longitudinal effect of changing environments on health.^{10,29,30} Over a long duration, place-based improvements might displace the original population. The results of place-based intervention studies investigating area-level health effects might have recorded health outcomes of a different, healthier population. Organisations holding health outcome data should make available anonymised individual-level and household-level data to enable researchers to consider the effects of gentrification. Gentrification might increase health

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

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

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

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

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

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

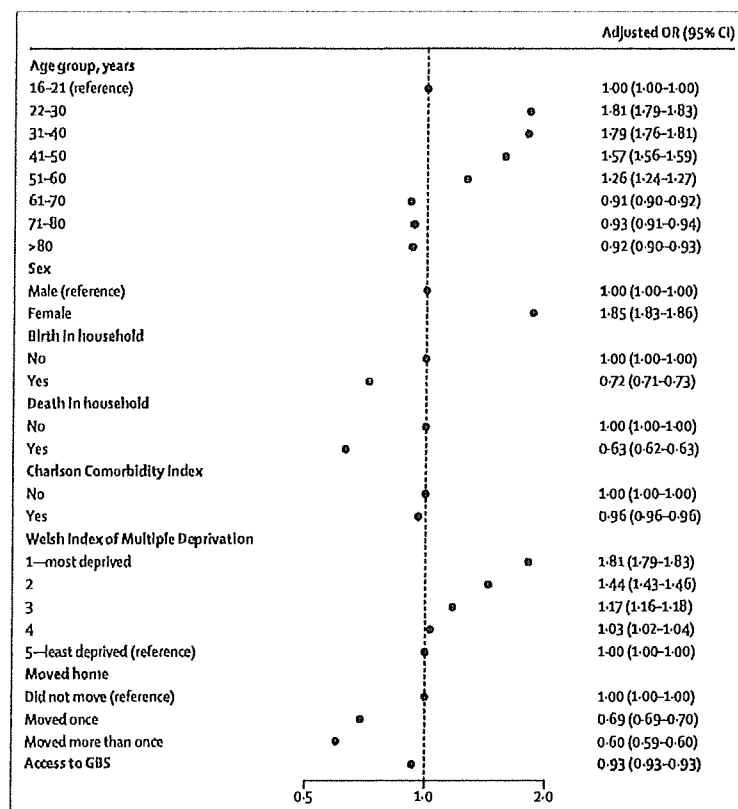


Figure 2: Factors associated with risk of CMD, including access to GBS

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

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

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

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

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

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

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can affect GBS use and thus health outcomes that require activity in a space.⁴⁴ Authorities responsible for designing and maintaining GBS have an opportunity to engage with seldom heard groups to ensure GBS are not only distributed equitably but also meet the satisfaction and needs of residents.

Although the study period for this research preceded the COVID-19 pandemic, the need for GBS to access or view was brought to the fore during the early stages of the pandemic, particularly for those living in urban areas with poor or no access to private or communal garden spaces. Our results suggest that investing in improved ambient greenness, as well as making public GBS accessible, might lead to future mental health benefits for adults with and without a history of CMD. There might also be additional co-benefits: job or food creation, biodiversity promotion, and flood prevention or carbon sequestration. Realising these requires a shift in the balance of decision making to place weight on protecting, enhancing, and providing more appropriate GBS designed for local communities. Urban GBS can therefore be thought of as a public health and social investment, providing a chance to rebalance our relationship with nature, to help address our climate change challenges, and to protect against the mental health challenges of future pandemics.⁴⁵

We have generated environmental health equity evidence that is important for policy and practice in the long-term prevention of common mental health disorders. This evidence would have otherwise been intractable to generate without using routinely collected environmental and health data and systems to dynamically link individuals into households and so to their changing environmental exposures.⁴⁶ It is challenging to convince governments to invest in preventative strategies that take decades to come to fruition. Here we provide evidence of the need for facilities to improve the health and wellbeing of all adults, especially those living in the most deprived areas. The burden of health care for this portion of our population, and on health-care systems to provide preventative treatments, could be reduced through the enhancement of our built environments by including appropriate GBS. Linking data on individuals and households across different organisations is essential as part of a population health management strategy to understand how we might alter the wider determinants of health to most effectively spend across local government and health care to promote public mental health.

Contributors

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

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

Data sharing

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

Declaration of interests

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

Acknowledgments

This project was funded by the NIHR Public Health Research programme (project number 16/07/07). Time for SBR to contribute to this project was funded by the NIHR Applied Research Collaboration North West Coast. We thank Roberto Villegas-Diaz for drawing the forest plots.

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

Received: 30/10/23

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: Full Name: JOHN MOLYNEUX Address: Telephone: Email: jfmolyneuxextra.co.nz
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S865

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

I OPPOSE the Plan Change; and particularly the following

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

I SEEK the following decision from the Council

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

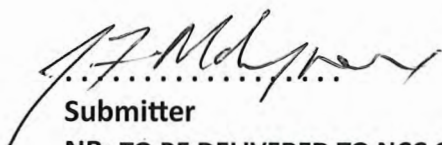
I REQUEST that Council appoints an independent Panel to hear the Submissions; and gives a further Notice extending the Closing Date for Submissions

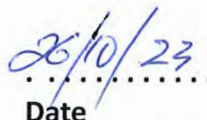
I ACKNOWLEDGE that I have found it extremely difficult to digest the total effect of the proposed PC 29 and its supporting documentation of over 2,000 pages,

Other comments or concerns I have about Plan Change 29

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

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


 Submitter


 Date

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

Tuesday 19th September

31/10/23

NDCS-539570224-18112

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 this section)~~ 

Full Name: Sarah Tania MITCHELL

Address: :

Received: 31/10/2023

Sub No: S866

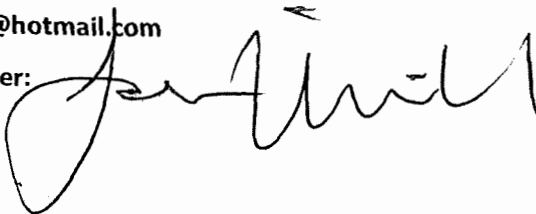
NDOCS-539570224-18113

Telephone:

Email: winsarah122@hotmail.com

Signature of Submitter:

Date: 31/10/2023



Delete as applicable: -

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

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

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

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

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



2) Hearing Panel

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

3) NCC's Population forecasts

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

4) Design Lead and Not Developer Lead Growth.

- a) Nelson is a very special and unique place that needs to be protected with care. It is unlike any other district in NZ. It includes a 'Low Rise' City with a collection of heritage and non-heritage character buildings that have attracted people for generations and been a cherished holiday destination for many New Zealanders.
- b) Residential Neighbourhoods should be protected for future generations to enjoy and new developments thoughtfully designed and planned on a neighbourhood, by neighbourhood basis to maintain the essence of their character.
- c) We need to protect and retain CBD historic facades as an essential part of the character of the Inner City.
- d) Contemporary Black Iron Clad Boxes, built only a few metres from 120-year-old Historic Homes is a thoughtless lack of long-term vision for maintaining the attraction of Nelson for all the future residents and visitors.
- e) Green Spaces, Trees and Landscaping are essential for the look and feel of some of our older neighbourhoods. They help considerably with the wellbeing of the residents and help to provide an essential part of the attraction of Nelson, which must all be considered during developing the growth of Nelson.
- i) I ask the Council to create a broader level of protection for neighbourhoods beyond the heritage buildings and precincts that still have historic character value from the early settlement years of Nelson.
- ii) I ask the Council to appoint an Urban Development Agency (UDA) to carefully guide growth and actively facilitate the emergence of cohesive urban neighbourhoods with a variety of high-quality housing choices.

5) Sunlight Recession Planes and Shading Effects

- a) Sunlight is a **CRITICAL** part of living in Nelson. It is not called the 'Sunshine Capital of NZ' for no reason. It is well documented that people relocate to Nelson because of the Sun and accept reduced wages called 'Sunshine Wages' for that privilege.
- b) TDC even 'Encourage the Sun into your home'. See <https://www.tasman.govt.nz/my-property/building-and-alteration/heating-and-insulation/energy-efficiency-and-heating-your-home/>
- c) All existing houses built prior to and under the current daylight admission rules will be subjected to the loss of sunlight amenity under PC29 with the following effects: -
 - i) Increased levels of mental health illness, anxiety and stress.
 - ii) Increased levels of damp homes with associated mould and mildew and respiratory illnesses.
 - iii) Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.
 - iv) Increased heating costs, air pollution, carbon foot print, are all exasperated due to a large portion of Nelson housing is old, with un-insulated walls and single glazing and open fires were legislated out of use many years ago.
 - v) Reduction in property values and increased financial stress, because the house would be less desirable to live in.
 - vi) Residents, struggling with the cost-of-living crisis may not afford to heat their home.
 - vii) Property owners will be reluctant to invest in making additional new (low rise) infill improvements on their section, with affordable additional units that **COULD** be overshadowed and devalued by a wealthier developer who could afford to build a multi-storey development next door at any time in the future.
- (1) I ask the Council to maintain the AP15 Daylight Admission protection rules to all pre-existing properties, unless the owner gives written approval to the contrary.
- (2) I strongly support the inclusion of Daylight and Sunlight policy statement Para RE2.3.i: The reception of daylight and sunlight to each household unit is a critical component of residential amenity that provides warmth and energy efficiency, and is vital for outdoor activities such as gardening and recreation. To ensure shading effects are minimised, and to ensure there is sufficient space around buildings to allow the admission of daylight to the site, this Plan has provided for daylight controls on all side and rear boundaries. The policy also applies to larger non-residential buildings such as schools or halls. The basic premise is that the daylight and sunlight received on a residential site should be no different whether or not the neighbour is residential. This philosophy applies whether the building is on an adjoining site or across a street.

6) Privacy and Outlook

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

7) Intensification

- a) I strongly oppose the High-Density Residential Zone. It is by no way in character or in keeping with any existing 'Low Rise' Nelson residential suburb and beyond the MDS legal mandate.
 - i) I ask Council to remove HDRZ from the plan completely.
 - ii) I ask Council to apply the new General Residential Zone equally across the entire Nelson district on the introduction of PC29, on the basis that AP15 Daylight Admission protection rules will apply to all pre-existing properties, unless the owner gives written approval to the contrary.
- b) I am strongly opposed to all new 'Green Field' developments being used for only single storey dwellings as it is a complete underutilisation of land that can accommodate increased intensification.
 - i) I ask Council to ensure a minimum of two storey dwellings be built on all new green field developments. Eg Golden Elms in Toi Toi, Ngawhatu Valley and Marsden Valley.
- c) Building holiday apartments that sit empty for long periods, does not solve our intensification, growth and affordability dilemma, and yet it locks up our valuable housing resource. Eg Rocks & Haven Road has many empty apartments.
 - i) I ask Council to consider solutions to mitigate against new-build empty holiday apartments.
- d) I oppose the increase of residential units beyond 4, as a **restricted discretionary** activity that does **NOT** require notification and written approval from neighbours.
 - i) I ask Council to ensure that more than 4 units requires notification, to restrict large 'out of character' accommodation blocks spanning multiple sections, and taking up lots of on street car parking spaces, popping up in a residential street, without warning.
- e) Bigger older properties, could be better utilised and help with our growth if they were more easily allowed to be divided into multi-dwellings.
- f) Building inner city apartments that offer an alternative solution to 'retirement villages', can free up the bigger homes for new families to occupy. The 'retired' occupants may also be less likely to be reliant on a vehicle, which may more closely suit the growth model desired.
- g) Designing Inner-City roof gardens and balconies with green spaces for commercial hospitality use or places for apartment living residents to relax and enjoy the Nelson Sun.
- h) Incentivise rate paying residents to demolish or relocate their house in favour of replacing more units on the same section providing they comply with the suitable character or heritage of the neighbourhood.

8) Progressively Phased Intensification

- a) Firstly, Inner City should be the starting place to have the most significant intensification, before forcing it onto the residential neighbourhoods, this can give more time to complete a better design vision for our residential neighbourhoods.
 - i) I ask Council to make better utilization of Car Only spaces, by developing them into shared spaces, with Accommodation overhead. 'Nelsust' highlights 44% of the Inner City as Car only spaces.
 - ii) I ask Council to retain para ICd.11 'The zone enables and encourages an increase in the density and diversity of quality housing in the City Centre by enabling residential activity above ground floor level. It is expected that over time, more people will choose

to live in the City Centre because of its easy access to offices, shops, entertainment and varied open spaces and experiences’.

- b) Secondly, City Fringe would be the next zone to phase in for Intensification.
 - i) I ask Council to negotiate and/or incentivise Industry and car yards to relocate, to less essential land that can be better used for accommodation.
- c) Finally, the Residential Zones would be the last area to be phased in, by working out from the City Fringe Zone (and Central Stoke).
 - i) I would support Medium Density Residential Zones (3 storey 11m high) progressively expanding from the CBD (and Central Stoke) **if required and over time**, providing AP15 Daylight Admission Protection rules remain in force for existing properties.

9) Intensification in hazard zones

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

10) On-street carparking

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

11) Social Housing

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

12) Infrastructure

- a) I ask the Council to include a plan to mitigate against future drought situations with a greater demand on the same amount of water from the Maitai Dam, for a greater population.
- b) I ask the Council to include a plan to mitigate against the increased capacity requirements for our waste water systems.
- c) I ask the Council to include a plan to mitigate against the increased capacity requirements for storm water.

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: Cameron Gordon MITCHELL

Address: :

Telephone:

Email: cameron.g.mitchell@hotmail.com

Signature of Submitter: 

Date: 31/10/2023

Delete as applicable: -

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Received: 30/10/23.

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

5868

NOCS - 539570224 - 18119

Submitter (Complete details below):

Full Name: GAYE ELEANOR + GORDON WAIDE

Address:

Telephone:

Email: gaye-eleanor@tasman.net

Signature of Submitter:

Date:

27/10/23

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.

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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Plan Change 29 was sprung on people and was difficult in parts to understand, daylight angles/ recession planes, etc far too hard to digest, figure out and read .. this caused much anger and anxiety for people and is unfair. Therefore I would like this Plan rejected and done properly.

I emailed our Mayor and Councillors, re Plan Change 29, the Mayor replied personally, but only 2 Councillors read my email.

There are many ordinary people like us who would like to submit, but who are not qualified, do not have the expertise, knowledge and confidence to do this ... also there are many people who do not have computer, or have ability to use one. Not everyone has social media ... Face Book etc accounts.

Please redo this Plan Change 29 ... I would like to think that **local** Building/ Landscape Architects will be given the opportunity to input,(without cause for exhorbitant fees to Ratepayers) the process has to be done in the correct manner.

Infrastructure and roads need attention first. Streets for People and Richmond on the Rise are a waste of taxpayers' money... there are many more important projects need commonsense and practical attention.

Do not want to see intensification and development controlled by Kainga Ora, Developers, Iwi and other landowners.

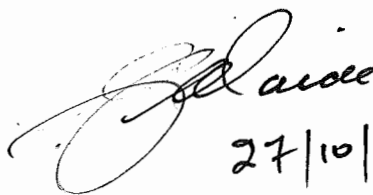
There is many empty housing in Nelson sitting empty – why? Where is the data re housing demand to justify this Plan?

We need to savour our Sunshine – a factor that makes your soul soar. Blocking it affects moods and mental health. Intensive housing leads to all sorts of social issues .. noise, loss of privacy, health, Covid and recurring viruses are here to stay and close living has been proven to be detrimental.

I would like to see a HEIGHT limit put on all buildings. No buildings on the ridgelines and we need to keep views of surrounds, hills, sea etc and not be blocked.

Lighting (the night Sky) has to be an important consideration.

Any intensification planned near existing buildings/homes, owners must be notified and have the right of objecting.


27/10/2023

RMA Submission Form for Publicly Notified Plan Change 29



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

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

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

OFFICE USE
Submission No: s869
Date Received Stamp: 31/10/2023
NDOCs No: NDOCs-539570224-18

*Required

Submitter Details

Full Name*	Paul Chester Denton		
Organisation			
Contact Person			
Postal address*			
Telephone*		Email*	pcdenton@xtra.co.nz

Trade Competition*

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

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

Council Hearing*

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

Public information

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

Signature of Submitter*

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

31 Oct 23

Date*

RMA Submission Form for Publicly Notified Plan Change 29

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

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

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

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

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

My submission is*:

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

Make Car Dealing an Industrial Activity. I support an additional change to the plan change and that is to make the city less focused on cars by making car sales and fossil fuel selling petrol stations an industrial activity. I understand that 37,690m2 of city centre and city centre fringe land is taken up by just car yards and servicing buildings. Having almost half of the city taken up with car dealers, roads and parking, disperses the good bits of being in a city, making the city experience more diffuse. A suggestion I support is a graduated timeline of 5 years for car yards and petrol stations to move out of the CBD.

RMA Submission Form for Publicly Notified Plan Change 29

I seek the following decision from the Council*:

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

Note:

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

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Sara Cooper

sara@illumin8.net.nz



31 October 2023

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

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

The reality that RATE PAYERS were unaware of the looming changes to their reality until this late hour, is absolutely criminal!

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 and unnecessary.
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- b) Residential Neighbourhoods should be protected for future generations to enjoy and new developments thoughtfully designed and planned on a neighbourhood, by neighbourhood basis to maintain the essence of their character.
- c) We need to protect and retain CBD historic facades as an essential part of the character of the Inner City.
- d) Contemporary Black Iron Clad Boxes, built only a few metres from 120-year-old Historic Homes is a thoughtless lack of long-term vision for maintaining the attraction of Nelson for all the future residents and visitors.
- e) Green Spaces, Trees and Landscaping are essential for the look and feel of some of our older neighbourhoods. They help considerably with the wellbeing of the residents and help to provide an essential part of the attraction of Nelson, which must all be considered during developing the growth of Nelson.
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 - 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.
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- (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.

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

Kind regards
Sara Cooper

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

Garry Wayne Cooper

Telephone:

Email: garry@illumin8.net.nz

GW Cooper Signature:



Date: 30/10/2023

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

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

Emotional Summary

It is with deep concern that I note the council appears to have forgotten who is paying the rates for the region, are we truly expected to lose our homes value and sunlight to make way for a hypothetical new over populated city. Most of us have worked our entire lives to pay for our homes so we can retire in a happy peaceful environment and it seems incredible that this council thinks that taking this away from us is acceptable. It is hard to believe that the council has inadvertently united the city by throwing itself up as the enemy. The level of anger seems to be more than any I have seen before and I can only hope that this ridiculous plan 29 is completely scrapped.

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

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Regards

Garry Cooper

NRMP PROPOSED PLAN CHANGE 29

Submitter: Amanda Young

amandayoungarchie@gmail.com

I oppose the plan in part.

The specific provisions of the proposal that my submission relates to are:

- Enabling intensification of development
- Heritage

Issues: Rules relating to Intensification of Development

- The proposed Plan Change 29 will greatly reduce the amenity, character and liveability of Nelson.
- The proposed Plan Change 29 will reduce and/or remove many of the qualities of the Inner City that are of competitive advantage and economic benefit, for example, the small scale of the buildings, the character and boutique feel of the inner shopping area, the heritage buildings and structures, the trees. These are the factors that differentiate Nelson from Richmond, encourage people to linger and attract visitors. They should be enhanced rather than diminished.
- The adverse effects of Plan Change 29 on existing residents will greatly outweigh the postulated benefits, for example, loss of amenity, sunlight.
- I agree that some intensification is needed and desirable but I do not believe that the city wide degree of intensification proposed by Plan Change 29 is warranted.
- The permitted height of 3 – 6 storeys in residential zones is inappropriate. It should be limited to 2 storeys to reduce adverse effects.
- The permitted heights in the Inner City Zone and Suburban Commercial Zone is inappropriate. It is too out of scale with the city and not needed. Height should be limited to 4 storeys in the Inner City Zone and 2-3 as appropriate in the Suburban Commercial Zone.
- I do not believe that the projected population growth used by Nelson City Council is correct.
- The proposed Plan Change 29 does not adequately consider effects on heritage and that the proposed Plan Change will have severe detrimental effects on Nelson's built heritage, historic areas, heritage trees and landscapes, archaeological sites and wāhi tūpuna.
- I believe that there are better ways to cater for growth and provide for necessary future housing, for example, use of neighbourhood plans; lower scale of development; encouragement of heritage building reuse and adaption (for example, in the inner city for residential accommodation) and more use of low scale "granny flats", tiny houses etc.
- There needs to be good urban and architectural design with each development carefully considered and controlled to ensure few adverse effects on existing residents, heritage, the environment and the character of the city. The overall development of each neighbourhood

should be carefully planned rather than allowed to develop piece-meal by developers and individuals.

My submission relating to Intensification of Development:

- I support the intent of Plan Change 29 for intensification rather than greenfield development.
- I support the intent of Plan Change 29 to encourage inner city living.
- I oppose all the proposed zones, rules and regulations within Plan Change 29.

I seek the following decision:

- That Plan Change 29 is rejected.
- That neighbourhood plans are instead designed in conjunction with residents and appropriate experts (such as urban designers, architects, heritage experts) to provide for some intensification without adverse effects on existing character, amenity, heritage, and existing residents (for example, retention of sunlight).
- If Plan Change 29 does go ahead, I submit that all new developments, across all zones, require robust urban design input as a rule rather than a recommendation.
- If Plan Change 29 does go ahead, I submit that medium density zone and the high residential zones are removed.
- If Plan Change 29 does go ahead, I submit that height in the Inner City Zone should be limited to 4 storeys and in the Suburban Commercial Zone 2-3 storeys as appropriate to avoid adverse effects.

Issues: Heritage

- The proposed Plan Change 29 does not adequately consider effects on heritage and will have severe detrimental effects on Nelson's built heritage, historic areas, heritage trees and landscapes, archaeological sites and wāhi tūpuna.
- The proposed Plan Change 29 facilitates and enables the loss of non-renewable heritage resources.
- Only built heritage is considered to be heritage affected by the plan change. The proposed Plan Change 29 does not include consideration of archaeological sites, heritage trees and landscapes and wāhi tupuna even when they are within the plan change area (it only includes a few heritage structures that were (incorrectly) placed on Appendix 1 of the NRMP). For example, the highly archaeologically and culturally significant kāinga at the intersection of Bisley Avenue, Rocks Road and Tāhunanui Drive has been placed within a proposed Suburban Commercial Zone allowing intensive development. Numerous archaeological sites and wāhi tupuna (recorded and unrecorded) are within the Inner City Zone. These are all threatened by the proposed intensification with no consideration of their values within the plan change S32 documents or rules.
- Appendix 2 and 3 need to be updated as items listed on those schedules also appear within the Plan Change 29 area.
- NCC relies on Heritage NZ Pouhere Taonga to prevent damage to archaeological sites; however, this ignores the responsibilities that NCC has under section 6 of the Resource Management Act.
- Current NCC rules and regulations have not been effective in preventing the removal and destruction of many heritage buildings, places and sites, for example, the arguably nationally significant heritage complex of the Catholic Church station at Collingwood Street has been substantially demolished over the last five years. The rules need to be strengthened not weakened.

- The proposed intensified housing zones include large areas of Nelson’s unique residential heritage housing. Nelson is renowned for having one of the best remaining heritage residential stocks within New Zealand. This adds to the character and amenity of Nelson, attracts residents, migrants and tourists, and is valuable in it’s own right. The proposed rules will result in the large scale modification of these areas. This is already occurring on a small scale with removal of individual houses but the new proposed rules will allow wholesale destruction. As a heritage professional, I see the result of already permissive heritage rules. I have numerous examples where developers and individuals have chosen not to consider heritage, character or amenity although these factors are not economically prohibitive to achieving good outcomes.
- Intensification is allowed next to places of significant heritage values, and will diminish those values.
- The removal of Inner City Heritage Precincts and the Wakefield Quay Precinct is very concerning and will lead to further destruction of the heritage stock. The approach of relying on individual listings rather than a heritage area allows for individual places to be “picked off”.
- The proposed Appendix 1 heritage list is fundamentally flawed-
 - It is not based on a thematic approach, which is heritage best practice;
 - It is based only on consideration of an outdated list which dates from the 1990s and was inadequate even then, for example, is weighted towards colonial residential buildings;
 - Errors in consideration from the original list have been carried over, for example, the inclusion of the Rocks Road chains but not the seawall itself;
 - There is no consideration of heritage buildings and structures other than those that were already on the list or were nominated by an owner;
 - The vast amount of previous work commissioned by NCC on heritage places has been ignored (such as the 2009 / 2010 work);
 - There are factual errors;
 - The assessments combine significance and values, and have two set of criteria;
 - The review of the Appendix 1 has been completed by one expert only. Input from experts with other specific skills is needed, for example, heritage architects;
 - Owners were allowed to influence the listing;
 - Place, setting and surrounds were not considered, for example, the setting of Bishopdale Chapel and Bishopdale House was not included although it is a fundamental part of the heritage values. Albion Square is another example.
 - Consideration was given to “appearance” rather than actuality, for example, dismissal of buildings based on an external appearance of modernity with no consideration of whether an older structure was intact underneath or the actual date of a building. My experience working as a heritage professional in Nelson has given me numerous examples where the external appearance belies the integrity of an earlier structure underneath. For example, the Globe Hotel – modern exterior and interior wall linings hid an almost intact 1872 / 1902 structure. 46 Halifax Street – NCC told the owner that it was ca.1920 based on external plaster cladding and façade however when demolishing, the 1877 structure was readily apparent. 333 Wakefield Quay – NCC told owners that the building was “modern” with no heritage value, an assumption based on 1969 – 1971 front alterations and plastering. The building was in fact a heritage significant 1865 house with substantial heritage fabric intact and the owners were devastated when they found out what they had inadvertently demolished with no

prior recording. A very stressful situation for considerate and responsible owners due to the inadequacy of NCC advice and lack of updating of heritage listings. I am currently working on a proposed demolition of a building in central Nelson. The external appearance is of a 1950s plastered building with a mid-twentieth century addition at the rear. However, the building is in fact 1868 and even the 1868 false front is still intact under the plaster;

- o Dismissal of buildings simply because their age is not thought to be old enough. This ignores the heritage values of more recent buildings but also does not consider the reality of the heritage stock in Nelson.
- o Narrow view of heritage where integrity has been ignored at the expense of authenticity (see examples above);
- o All the Heritage NZ Pouhere Taonga listed places and areas are not included.
- The heritage provisions take effect immediately allowing owners to demolish buildings if they have been removed from the schedule before the listings can be properly reviewed.
- Plan Change 29 does not encourage the adaption and reuse of Inner City heritage buildings.
- No city-wide character study has been completed.
- No NCC in-house heritage expertise able to assess the impact of a development on heritage values.

My submission relating to Heritage:

- I support the inclusion of Richmond Avenue as a heritage area.
- I support the removal of Category C and the proposal to have a two tier ranking system.
- I support the adaptive reuse measures such as earthquake strengthening and solar installation.
- I oppose the proposed Appendix 1 schedule as it is inadequate and flawed. All listings need to be reviewed by a multi-disciplinary team and include a thematic approach and take into consideration the points of concern listed above.
- I oppose the deletions of any listings until they have been reviewed by a multi-disciplinary team.
- I oppose the narrow consideration of heritage and the exclusion of archaeological sites, heritage trees and landscapes and wāhi tupuna. These all need to be taken into consideration, and the respective presently inadequate schedules updated.
- I oppose the removal of Inner City Heritage Precincts and the Wakefield Quay Precinct.
- I support the submissions by Heritage Nelson and Ian Bowman.

I seek the following decision:

- That Plan Change 29 is rejected until heritage protection is strengthened and points raised above are addressed.
- That NRMP Appendixes 1 - 3 are immediately comprehensively reviewed by a multi-discipline team using a thematic approach including consideration of new items. This should build on previous work carried out between 2009 and 2023.

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

I do not gain an advantage in trade competition through my submission.

Amanda Young 31/10/2023

Received 31/10/2023

Rev 10-01a

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

Submitter:

Full Name: **Vincent Albert Riepen**

Address:

Telephone:

Email: **vriepen@gmail.com**

Signature of Submitter:



Date: **31th October 2023**

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

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

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

Get home, close the door, sink on to the sofa after a hard day. A familiar image? Adverts depicting smiling, happy people in lovely homes surround us. Having your own home is clearly an aspiration for our society.

Houses are more than physical structures providing shelter. They are homes – where we bring up our families, socialise with friends, our own space where we can unwind, keep our possessions safe and take refuge from the rest of the world. They're where we spend most of our time.

Where we live can influence our health through many means. Independent and impartial research makes it clear that housing conditions can influence our physical health. For example, a warm and dry house can improve general health outcomes and specifically reduce respiratory conditions. However, housing also has a huge influence on our mental health and wellbeing.

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

- i) No accountability for creating poorer health outcomes for affected parties where reduced amenity values of their homes through increased shadowing, loss of sunshine, views and privacy. Ref research paper; New Zealand Population Review, 47, 16–32
copyright © 2021 Population Association of New Zealand The Effects of Housing on

Health and Well-Being in Aotearoa New Zealand Ngā Pānga o Ngā Whare Noho ki te Hauora me te Toiora i Aotearoa.

- ii) No financial compensation to the affected resident's adversely affected by implementing PC 29. Ref research paper - Valuing Sunshine David Fleming, Arthur Grimes, Laurent Lebreton, David C. Maré, Peter Nunns Motu Working Paper 17-13 Motu Economic and Public Policy Research June 2017. Finding that each additional hour of direct sunlight exposure for a house per day (on average across the year) adds 2.4% to a dwelling's market value. This estimate is robust to a variety of specifications that investigate whether the value is conditional on other factors relating to the characteristics of the house or its suburb.
- b) 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. 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 on street car parking with increased intensification due to no requirement for on-site car parking.
 - (2) Loss of privacy with bigger buildings that are closer to boundaries.
 - (3) Loss of property value with loss of views, sunlight, and privacy.
 - (4) Increased levels of noise with increased residential dwellings around a boundary.
 - (5) Residential unit numbers per building can be increased on a 'restricted discretionary' basis without notification or written approval.
 - (6) Exaggerated population forecasts.
 - (7) Council voted **NOT** to withdraw PC 29 on Sept 14th Meeting.
 - (8) 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) Every community is a very special and unique place that needs to be protected with care. It is unlike any other district.
- 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 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) 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.
- b) 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".
- 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 will have the following effects: -
 - i) A reduction in property values of 2.4% for each reduced hour of sunlight will occur adding to increased financial stress and anxiety within the community, followed with unfavourable outcomes for the wider community.
 - ii) Increased levels of mental health illness, anxiety and stress.
 - iii) Increased levels of damp homes with associated mould and mildew and respiratory illnesses.
 - iv) Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.

- v) Increased heating and maintenance 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.
- vi) Property owners will be reluctant to invest in making and maintaining improvements on their section. Severely affected properties will gradually deteriorate until they reach their use by date. Quality of existing neighbourhood will be diminished.
- vii) 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.
- 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. This is where the opportunity exist create satellite communities. Cost of providing servicing infrastructure to be borne by the entire community, and not in an unproportionally bias to existing properties adversely affected, loss value, where proposed PC 29 could occur.
 - 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 streets. One hundred and twenty residents will be further restricted in their ability to move/rest along streets with the higher level of congestion and off site carparking.
- e) 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. Retirement Village occupancy is the greatest growth sector of the Nelson housing market.
- f) 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.
- g) 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) 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 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. There is no variation in street design weather used by vehicles or pedestrians needs. Halifax Street East, Bridges Street needs to be preserved and improved to facilitate access for the high concentration of elderly residents living in The Wood and Green Gables retirement home. Wheel chair, mobility scooter and Zimmer frame ease of access can not be further detrimented.
- 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, emergency vehicle's, 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, particularly those with restricted ability to move.
- f) Driving up and reversing out of very steep driveways is challenging at best and potentially unsafe.

- g) 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, including on foot, access along Halifax Street East and Bridge Street on Zimmer a frame.
 - 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.

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.

Senior Planning Administrator

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

31 October 2023,

RE: PC 29

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

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

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

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

- a) That I have found it difficult to digest the total effect of the proposed PC 29 and its supporting documentation due to its size and complexity.
- b) That I have found PC 29 lack of early public engagement and consultation by Council, with its severe implications towards the well-being of existing rate paying residents enjoyment of their properties, extremely stressful and unnecessary.
- c) That I have been put in a position of hoping more qualified citizens than I, will make more comprehensive submissions covering my concerns as to the future of Nelson and its ratepaying residents.
- d) That Council Planning Staff have stated at numerous meetings "This is a 'Broad Brush approach' that requires public submissions to refine the plan". Such a statement implies PC 29 has been prematurely put out for public submissions in an incomplete and inaccurate state that requires the public to learn and understand its entirety, so they can re-design it.
 - i) I am asking Council to withdraw PC 29 and get Council Planning staff to refine the plan design and then put it back out for public submissions.

Design Lead and Not Developer Lead Growth.

- e) 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.
- f) 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.
- g) We need to protect and retain CBD historic facades as an essential part of the character of the Inner City.
- h) Contemporary Black Iron Clad Boxes, built only a few metres from 120-year-old Historic Homes is a thoughtless lack of long-term vision for maintaining the attraction of Nelson for all the future residents and visitors.

- i) Green Spaces, Trees and Landscaping are essential for the look and feel of some of our older neighbourhoods. They help considerably with the wellbeing of the residents and help to provide an essential part of the attraction of Nelson, which must all be considered during developing the growth of Nelson.
- i) I ask the Council to create a broader level of protection for neighbourhoods beyond the heritage buildings and precincts that still have historic character value from the early settlement years of Nelson.
- ii) I ask the Council to appoint an Urban Development Agency (UDA) to carefully guide growth and actively facilitate the emergence of cohesive urban neighbourhoods with a variety of high-quality housing choices.

Sunlight Recession Planes and Shading Effects

- j) 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.
- k) 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/>
- l) All existing houses built prior to and under the current daylight admission rules will be subjected to the loss of sunlight amenity under PC29 with the following effects:-
 - i) Increased levels of mental health illness, anxiety and stress.
 - ii) Increased levels of damp homes with associated mould and mildew and respiratory illnesses.
 - iii) Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.
 - iv) Increased heating costs, air pollution, carbon foot print, are all exasperated due to a large portion of Nelson housing is old, with un-insulated walls and single glazing and open fires were legislated out of use many years ago.
 - v) Reduction in property values and increased financial stress, because the house would be less desirable to live in.
 - vi) Residents, struggling with the cost-of-living crisis may not afford to heat their home.
 - vii) Property owners will be reluctant to invest in making additional new (low rise) infill improvements on their section, with affordable additional units that **COULD** be over shadowed and devalued by a wealthier developer who could afford to build a multi-storey development next door at any time in the future.
- (1) I ask the Council to maintain the AP15 Daylight Admission protection rules to all pre-existing properties, unless the owner gives written approval to the contrary.
- (2) I strongly support the inclusion of Daylight and Sunlight policy statement Para **RE2.3.i**: The reception of daylight and sunlight to each household unit is a critical component of residential amenity that provides warmth and energy efficiency, and is vital for outdoor activities such as gardening and recreation. To ensure shading effects are minimised, and to ensure there is sufficient space around buildings to allow the admission of daylight to the site, this Plan has provided for daylight controls on all side and rear boundaries. The policy also applies to larger non-residential buildings such as schools or halls. The basic premise is that the daylight and sunlight received on a residential site should be no different whether or not the neighbour is residential. This philosophy applies whether the building is on an adjoining site or across a street.

Privacy and Outlook

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Intensification

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 - 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.
- p) 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.
- q) 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.
- r) Bigger older properties, could be better utilised and help with our growth if they were more easily allowed to be divided into multi-dwellings.
- s) 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.
- t) 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.
- u) Incentivise rate paying residents to demolish or relocate their house in favour of replacing more units on the same section providing they comply with the suitable character or heritage of the neighbourhood.

Progressively Phased Intensification

- v) 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'.
- w) 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.
- x) 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.

On-street carparking

- y) 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.
 - iii) I ask Council to improve cycle ways and foot paths so that non-motorists can commute with greater ease and safety.

Social Housing

- z) Social housing should be low cost and humble, meeting basic requirements yet incentivising people to work towards home ownership.
 - i) I would like to see Council have more fit for purpose controls for antisocial behaviour that affects the existing neighbour's enjoyment of their property.

Infrastructure

- aa) 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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Kind regards,
Ingrid Weeks

ingridjade@gmail.com

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- f) 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.
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 - 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'.

Intensification

- n) I strongly oppose the High-Density Residential Zone. It is by no way in character or in keeping with any existing 'Low Rise' Nelson residential suburb and beyond the MDS legal mandate.
 - i) I ask Council to remove HDRZ from the plan completely.
 - ii) I ask Council to apply the new General Residential Zone equally across the entire Nelson district on the introduction of PC29, on the basis that AP15 Daylight Admission protection rules will apply to all pre-existing properties, unless the owner gives written approval to the contrary.
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- t) 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.
- u) Incentivise rate paying residents to demolish or relocate their house in favour of replacing more units on the same section providing they comply with the suitable character or heritage of the neighbourhood.

Progressively Phased Intensification

- v) 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.

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- y) 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.
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Social Housing

- z) Social housing should be low cost and humble, meeting basic requirements yet incentivising people to work towards home ownership.
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- aa) 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.
- bb) I ask the Council to include a plan to mitigate against the increased capacity requirements for our waste water systems.
- cc) I ask the Council to include a plan to mitigate against the increased capacity requirements for storm water.

Kind regards,
 Terry & Anna Rodgers
 65 Neale Ave, Stoke, Nelson 7011
terry.rodgers@xtra.co.nz
 (03) 5450413

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

31 October 2023,

RE: PC 29

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

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

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

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

- a) That I have found it difficult to digest the total effect of the proposed PC 29 and its supporting documentation due to its size and complexity.
- b) That I have found PC 29 lack of early public engagement and consultation by Council, with its severe implications towards the well-being of existing rate paying residents enjoyment of their properties, extremely stressful and unnecessary.
- c) That I have been put in a position of hoping more qualified citizens than I, will make more comprehensive submissions covering my concerns as to the future of Nelson and its ratepaying residents.
- d) That Council Planning Staff have stated at numerous meetings "This is a 'Broad Brush approach' that requires public submissions to refine the plan". Such a statement implies PC 29 has been prematurely put out for public submissions in an incomplete and inaccurate state that requires the public to learn and understand its entirety, so they can re-design it.
 - i) I am asking Council to withdraw PC 29 and get Council Planning staff to refine the plan design and then put it back out for public submissions.

Design Lead and Not Developer Lead Growth.

- e) 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.
- f) 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.
- g) We need to protect and retain CBD historic facades as an essential part of the character of the Inner City.
- h) Contemporary Black Iron Clad Boxes, built only a few metres from 120-year-old Historic Homes is a thoughtless lack of long-term vision for maintaining the attraction of Nelson for all the future residents and visitors.

- i) Green Spaces, Trees and Landscaping are essential for the look and feel of some of our older neighbourhoods. They help considerably with the wellbeing of the residents and help to provide an essential part of the attraction of Nelson, which must all be considered during developing the growth of Nelson.
- i) I ask the Council to create a broader level of protection for neighbourhoods beyond the heritage buildings and precincts that still have historic character value from the early settlement years of Nelson.
- ii) I ask the Council to appoint an Urban Development Agency (UDA) to carefully guide growth and actively facilitate the emergence of cohesive urban neighbourhoods with a variety of high-quality housing choices.

Sunlight Recession Planes and Shading Effects

- j) 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.
- k) 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/>
- l) All existing houses built prior to and under the current daylight admission rules will be subjected to the loss of sunlight amenity under PC29 with the following effects:-
 - i) Increased levels of mental health illness, anxiety and stress.
 - ii) Increased levels of damp homes with associated mould and mildew and respiratory illnesses.
 - iii) Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.
 - iv) Increased heating costs, air pollution, carbon foot print, are all exasperated due to a large portion of Nelson housing is old, with un-insulated walls and single glazing and open fires were legislated out of use many years ago.
 - v) Reduction in property values and increased financial stress, because the house would be less desirable to live in.
 - vi) Residents, struggling with the cost-of-living crisis may not afford to heat their home.
 - vii) Property owners will be reluctant to invest in making additional new (low rise) infill improvements on their section, with affordable additional units that **COULD** be over shadowed and devalued by a wealthier developer who could afford to build a multi-storey development next door at any time in the future.
- (1) I ask the Council to maintain the AP15 Daylight Admission protection rules to all pre-existing properties, unless the owner gives written approval to the contrary.
- (2) I strongly support the inclusion of Daylight and Sunlight policy statement Para **RE2.3.i**: The reception of daylight and sunlight to each household unit is a critical component of residential amenity that provides warmth and energy efficiency, and is vital for outdoor activities such as gardening and recreation. To ensure shading effects are minimised, and to ensure there is sufficient space around buildings to allow the admission of daylight to the site, this Plan has provided for daylight controls on all side and rear boundaries. The policy also applies to larger non-residential buildings such as schools or halls. The basic premise is that the daylight and sunlight received on a residential site should be no different whether or not the neighbour is residential. This philosophy applies whether the building is on an adjoining site or across a street.

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Kind regards,
 Brian Rodgers
 61 Stanley Crescent, Beachville, Nelson 7010
brianrodgers116@gmail.com
 +64224681365

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

Submitter: Martin and Paula Hucklesby

Full Name: Martin Hucklesby

Address: **57 Seymour Avenue, The Brook, Nelson 7010**

Telephone: 022 642 5037

Email: **marthuck01@gmail.com**

Signature of Submitter:



Date: **31 October 2023**

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

Dear Sir,

Like the author of the submission below, which I believe you have or will receive in its own right, we reject PC 29 in its entirety.

PC29 appears to be a hastily-compiled collection of kite-flying suggestions, not well- thought-out enough to qualify as a plan yet alarming in its general direction of intensification at all costs and abandonment of decades of careful law-making, forward-looking conservation processes and preservation of Nelson's history.

That would be the extent of my submission, from the point of view of a ratepayer, concerned resident and maintainer of a 109-year-old house in an historic precinct, and a moderately well-informed layman.

However, having been shown the thorough and articulate submission below, based as it is on wide knowledge and specific expertise, and adding carefully-considered alternative solutions, we would like to add our support to all its opinions, findings and conclusions.

Regards,

Martin and Paula Hucklesby

Referred submission follows:

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

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

- a) That I have found it difficult to digest the total effect of the proposed PC 29 and its supporting documentation due to its size and complexity.

- b) That access to a paper copy of PC 29 and the Section 32 reports has not been made available for residents who do not have access to, or the ability to use a computer.
- c) That I have found PC 29 lack of early public engagement and consultation by Council, with its severe implications towards the well-being of existing rate paying residents enjoyment of their properties, extremely stressful, 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: -

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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.

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 - 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) 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.
 - 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.

RMA Submission Form for Publicly Notified Plan Change 29

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

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

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

OFFICE USE
Submission No: S878
Date Received Stamp: 31/10/2023
NDOCs No: 539570224-18144

*Required

Submitter Details

Full Name*	Melinda MM & Craig D Harvey		
Organisation			
Contact Person	Melinda Harvey		
Postal address*			
Telephone*		Email*	TotheHarveys@gmail.com

Trade Competition*

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

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

Council Hearing*

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

Public information

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

Melinda Harvey

Signature of Submitter*

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

31/10/2023

Date*

RMA Submission Form for Publicly Notified Plan Change 29

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

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

- | | |
|---|--|
| ☐ Oppose the Plan Change in part | ☒ Oppose the Plan Change |
| ☐ Support the Plan change in part | ☐ Support the Plan Change |
| ☐ Are Neutral about the Plan Change | ☒ Request amendments to the Plan Change |

My submission is*:

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

As set out in attached document - 12 pages

I am submitting on behalf of my husband, Craig Harvey and myself, as ratepayers and citizens of Nelson City.

As part of full disclosure Craig and I own (through a Property Company) several properties in the Nelson region.

Craig and I oppose and reject the **Proposed Private Plan Change 29** in its **entirety** for the reasons listed below;

1. The process has been deficient and unacceptable by not going out for community consultation.
2. The commissioners assigned are not impartial or independent and in so appointing, NCC are breaching the rights of Nelson residents to be heard in a fair, just and unbiased tribunal.
3. 'Sunny' ranked 1st for preferred feature for all Nelson home owners that were surveyed in a study commissioned by the council, yet sunshine is not taken into consideration in the policies of PPC29.
4. NCC has been providing misleading or exaggerated information on the future population growth.
5. NCC are imposing Tier 1 local authority MDRS density standards into their resource management plans but, Nelson is a Tier 2 local authority, so the density standards are not required to be applied to the Nelson region
6. There has been no social impact assessment completed for the PPC29.
7. The time frame has been too compressed, considering 'Plan Change 29 is the biggest plan change that we have done as a Council in a generation' (Our Nelson, issue 176).
8. Key documents were not available to all Nelson residents and some vital information only available online. The online information was hard to find and there were many pages to read and review in the original 28 days, later extended to a 60 day timeframe.

1. Dissatisfaction with the Process:

I feel aggrieved that I have had to read the masses of documents and submit on this PPC29 when I should have been spending time with my family.

NCC had a chance to withdraw PPC29 and instead consult on it as a draft.

Councillor Courtney put forward a motion which could have halted this submission process. His comments represented the voices of Nelson residents *"the council needed to go back and work with the community, which it failed to do so far, the plan change should not be rushed through, the Nelson community are not opposed to intensification...but they want it to be planned carefully... and at a scale that is more refined. The proposed plan change was a 'free for all' and council and major needed to admit they got it wrong. We should have been more thorough right at the beginning."* The Mayor agreed and admitted he 'erred as mayor', he had 'made the assumption that consultation around intensification was covered during Future Development Strategy process', not realising that the level of detail in PPC29 was not in the strategy. Below shows the motion lost 5-7.

Recommendation		
<i>That the Council</i>		
6. <i>Receives the Mayor's update on Plan Change 29, notes the strong public opposition, and resolves to formally withdraw the notification, changing its status to a draft Plan Change, and continue community engagement and submissions on the draft, with the intention to renotify a modified Plan Change 29 following community engagement.</i>		
The motion was put and a division was called:		
For	Against	Apology
His Worship the Mayor Hon Dr Smith (Chairperson)	Cr Anderson	Cr Rainey
Cr Bengé	Cr Brand	
Cr Courtney	Cr Hodgson	
Cr Paki Paki	Cr O'Neill-Stevens	
Cr Rollo	Cr Sanson	
	Cr Skinner	
	Cr Stallard	
The motion was lost 5 - 7.		

At that point in time, PPC29 could have been withdrawn and changed to a draft plan going out for community engagement and consultation. I believe that decision to proceed with the motion (above) was disrespectful to all Nelson residents. Our NCC councillors have neglected their duty of care to plan adequately and consult with the community, and instead they have placed the onus on every single resident of Nelson to research and read the many documents needed to put forward a submission; an unnecessary stress and pressure on each of us.

2. Commissioners

I am concerned the commissioners chosen are not independent. Both commissioners have already formed preliminary opinions and by voting on the motion (above) their position already shows their bias and proves they have a clear conflict of interest. The Mayor has repeatedly stated that local knowledge is important on a Hearing Panel to get the best outcome, but how can we know that they are open minded when they have already publicly declared their views.

It is more important that the Commissioners are impartial with the experience and training needed to listen to all submissions without bias.

For a matter of such importance it behoves NCC to do the right thing and appoint a panel of independent commissioners. The Christchurch City Council is going through this process and they have elected to have an independent hearing panel of 5. I would like NCC to do the same.

I looked at 4 pieces of government legislation to understand if this is proper and correct, all evidence states the commissioners for PPC29 should be impartial and unbiased.

A quick look at the [Local Government Act 2002](#) shows the **expectations of councils**, briefly—
The purpose of local government is –

- To enable democratic local decision-making and action by, and on behalf of, communities
- To promote the social, economic, environmental, and cultural well-being of communities in the present and for the future.

Code of Conduct - Te Tāhū o te Ture - Ministry of Justice August 2023

“Interacting with all clients and the public fairly, equitably, inclusively, and respectfully, recognising their mana, dignity and worth. You must be impartial, unbiased, unprejudiced, fair, and just.”

Legislation Design and Advisory Committee - Chapter 4 - Fundamental constitutional principles and values of New Zealand Law.

The following are some of the most important constitutional principles of New Zealand Law.

The rule of law: the full scope of the rule of law is the subject debate, but at its core are the following principles:

- Everyone is subject to the law, including the Government
- The law should be clear, and clearly enforceable
- There should be an independent, impartial judiciary—Certain decisions must be made by judges who are independent of the government. Judges interpret legislation and develop the common law. They decide disputes between individuals and between individuals and the Government.

Tribunals In New Zealand - Law Commission January 2008

2.31 Where individual rights are at stake, tribunals offer the protection of a formal process separate from the administration. This is especially important in relation to disputes between citizens and the state, it is seen as important to the rule of law that these disputes be determined by judges who are impartial and independent from the executive.

2.34 in sum, the main purposes for which tribunals are established are:

- to improve public access to dispute settlement mechanisms;
- to provide simple, speedy, cheap and accessible justice;
- to provide specialist expertise in a particular area;
- to give the protection of a formal process separate from the administration where individual rights are at stake;
- to correct any errors in the original decisions made by administrators through review by tribunals;
- to promote executive accountability by providing oversight of administrative decision-making; and
- to deal with large volumes of low level cases.

Independence

2.47 a key rationale for the existence of tribunals is that they should be independent, and decide cases impartially, providing the citizen with a source of review or dispute resolution independent of government influence. Tribunals generally are not subject to administrative interference and are not composed of people allied with the administration. This is important as the work of some tribunals involves reviewing administrative decisions, and they must be able to make such decisions without fear as to the possible executive response.

2.48 appointment processes should reflect the goal of independence. There can also be issues of independence surrounding the administration of tribunals. Ideally tribunals should not be administered by departments that are involved in the cases which come before them.

Natural justice

2.54 The rules of natural justice apply to tribunals as to other decision-makers. These rules are commonly divided into two basic elements, known as the hearing rule and the rule against bias. The rule against bias is that the judge or decision-maker in a case must be impartial.

3. Sunlight

Sunlight is a critical part of living in Nelson, but also a core physiological need.

This feature is actually the main reason why I am putting in a submission.

‘Sunny’ ranked 1st for preferred feature for all Nelson home owners that were surveyed.

NCC and TDC commissioned m.e. consulting for the Future Development Strategy (FDS) Their report on *Nelson-Tasman Housing We’d Choose - Housing Demand Preferences - June 2021* for the Future Development Strategy (FDS) I found hidden as Appendix 4 attached to 1A - *Housing and Business Development Capacity Assessment 2021*. I do query why this information as full transparency was not given it’s own appendix as that of m.e. consulting’s other report (1G) *Nelson City Housing Plan Change - Economic Assessment - Market Economics - May 2023*.



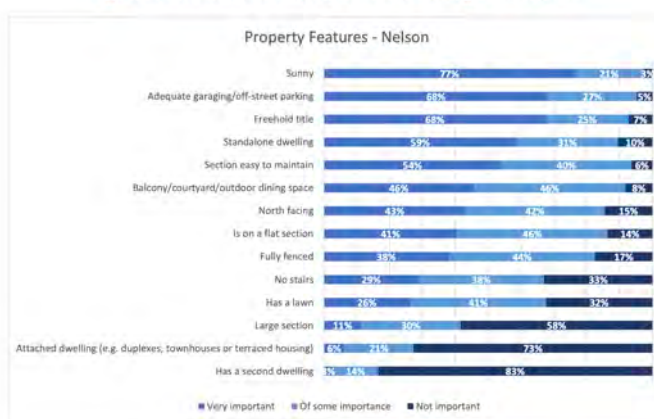
I have extracted some information from this June 2021 report as it is very relevant to PPC29.

4.2.4 Property Features

Many of the features related to properties were rated as being very important to many respondents when thinking about choosing a place to live, **in particular over two thirds consider that Sunny, Adequate off-street parking and Freehold title where very important to over half the respondents (Figure 4.7).**

Sunny is aligned with warmth – one of the core physiological needs identified by Maslow. Given he postulated that people need to satisfy these fundamental needs before attending to needs higher up the scale – such as self-fulfilment and self-esteem, it is not surprising Sunny scored highly here.

Figure 4.7: Preferences for Property Features of Housing – Nelson Urban



For Nelson, Sunny was the highest rated property feature, with 77% considering it as ‘very important’. Other features rated as ‘very important’ by more than half of respondents were Adequate parking (68%), Freehold title (68%), Standalone dwelling (59%), and Section easy to maintain (54%).

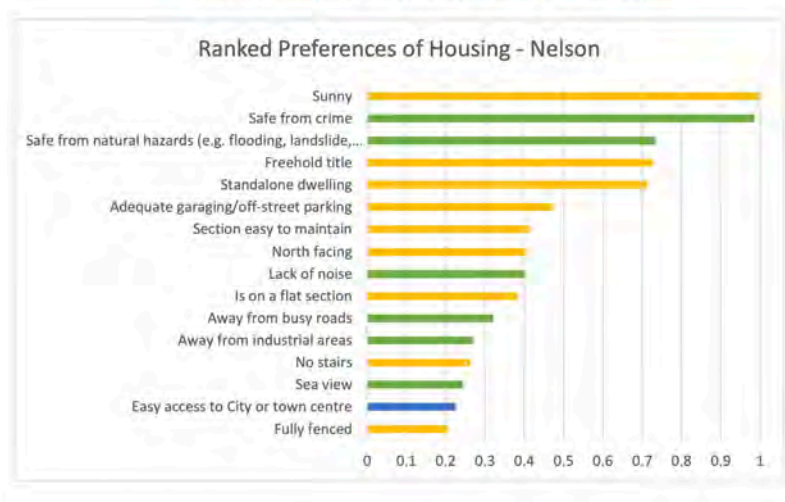
The top 2 features that were important or very important to Nelson residents were Sunshine and off street parking - 98% and 95% respectively. The very 2 features that PPC29 will eliminate if this plan change goes through.

4.2.5 Overall Rankings of Features of Housing

The respondents were asked to then rank the features that they selected as 'Very Important' from 1 to 5. Figure 4.9 below shows an index of the relative importance of these features, which is **based on the most highly rated feature**. The colours in the bar graph indicate which type of features they are, with green being an Environment feature, yellow being a Property feature, blue being a Location feature and purple being a Facility feature. The figures shows that respondents ranked features that relate to environment and property most highly. By far the most important features were Safe from crime, Sunny and Freehold title. (index of 0.65). Other important features of housing include Safe from natural hazards and being a standalone dwelling. While there are some differences between Nelson and Tasman, the respondents in each area have broadly consistent preferences. **Also we note that these results are consistent with the previous Housing We'd Choose studies.**

'Sunny' ranked 1st for preferred feature for all Nelson home owners that were surveyed.

Figure 4.9: Ranked Preferences of Housing – Nelson Urban



By allowing PPC29 through as it stands, all existing houses could be subject to the loss of sunlight which if happens those residents will:

- have increased levels of mental illness, anxiety and stress
- find their property value decreases overnight
- no longer be able to use or install solar energy for heating or power
- need to use more power to heat their home due to reduced sunlight as a heat source
- under the shadow, their home will be more likely to become damp and as a result develop mould, mildew and a health outcome being higher respiratory illnesses
- less likely to add value to their property via infill or improvements, if the unknown of what is going to be built next door is looming over them

4. There are discrepancies in NCC future population growth.

This graph and table were taken from appendix 1G to use as an example.

Nelson City Housing Plan Change - Economic Assessment - Market Economics - May 2023. (m.e consulting)

- i. NCC projections: 6,900 dwellings.
- ii. SNZ High Series: 5,900 dwellings.
- iii. SNZ Medium Series: 2,600 dwellings.
- iv. SNZ Low Series: -300 dwellings.

Figure 2-1: Comparison of Future Total Nelson Dwelling Demand by Projection Series

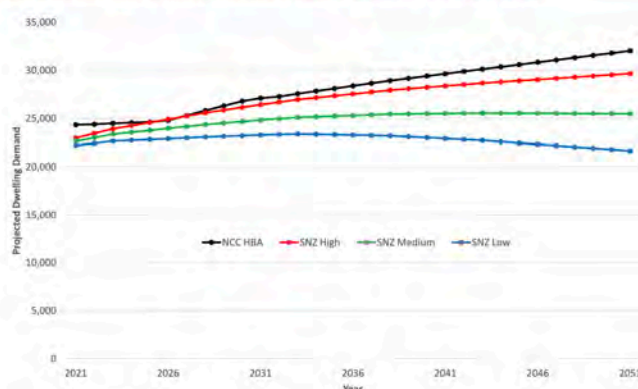


Table 2-1: Comparison of Future Nelson Net Change in Dwelling Demand by Projection Series

Projection Series	Time Period		
	Short-Term	Medium-Term	Long-Term
Net Change in Dwelling Demand (Dwellings)			
NCC HBA	500	3,050	8,000
SNZ High	1,550	3,750	6,950
SNZ Medium	1,200	2,450	3,100
SNZ Low	800	1,300	-300
Net Difference to NCC Projection			
SNZ High	-1,050	-700	1,000
SNZ Medium	-700	600	4,850
SNZ Low	-300	1,700	8,300
Percentage Difference to NCC Projection			
SNZ High	-69%	-19%	15%
SNZ Medium	-60%	24%	157%
SNZ Low	-39%	129%	-2817%

Source: NCC 2021 HBA and Calculations from SNZ Household Projections (2021 series).

Why is NCC using projections that do not align with Statistics New Zealand and are forecast as higher? What is the reasoning?

How can NCC choose to depart from using Statistics New Zealand data, exaggerate the data, and then build a 'biggest plan change that we have done as a Council in a generation' around it.

I can not see the logic in NCC projections. PPC29 is based on inflated 'in house' projections.

5. NCC is a tier 2 council;

Here is an excerpt from page 25 of Section 32 Evaluation Report.

The Amendment Act contains the Medium Density Residential Standards (MDRS) which include density standards that will enable medium density housing across relevant residential zones in New Zealand.

All Tier 1 local authorities are required to incorporate the MDRS density standards into their resource management plans but, Nelson is a Tier 2 local authority, so the density standards are not required to be applied (refer to NPS-UD in Section 6.2 below) to the Nelson region.

One of the key drivers of PC29 is to amend the NRMP to give effect to the intensification direction of the NPS-UD, including Policies 2 and 5 which tier 2 Councils' must give effect to. More specific detail about the how the NPS-UD has been given effect to through zone-specific objectives, policies, rules, and other methods is contained in the specific topic evaluation reports.

- Policy 2 requires district plans applying to **tier 2 Councils to enable at least sufficient development capacity to meet expected demand;**
- Policy 5 requires district plans applying to **tier 2 Councils to enable heights and density of urban form commensurate with the greater of:**

Building the multi storey buildings in residential areas are not commensurate with the surrounding, however they would be if they were built within the city centre. NCC are going beyond what is asked of a Tier 2 council As Tier 2, we need to enable sufficient development capacity to meet expected demand.

6. Where is the Social Impact Assessment?

Social impact assessment (SIA) is the most accepted and recognised framework used in New Zealand and internationally to manage social impacts.

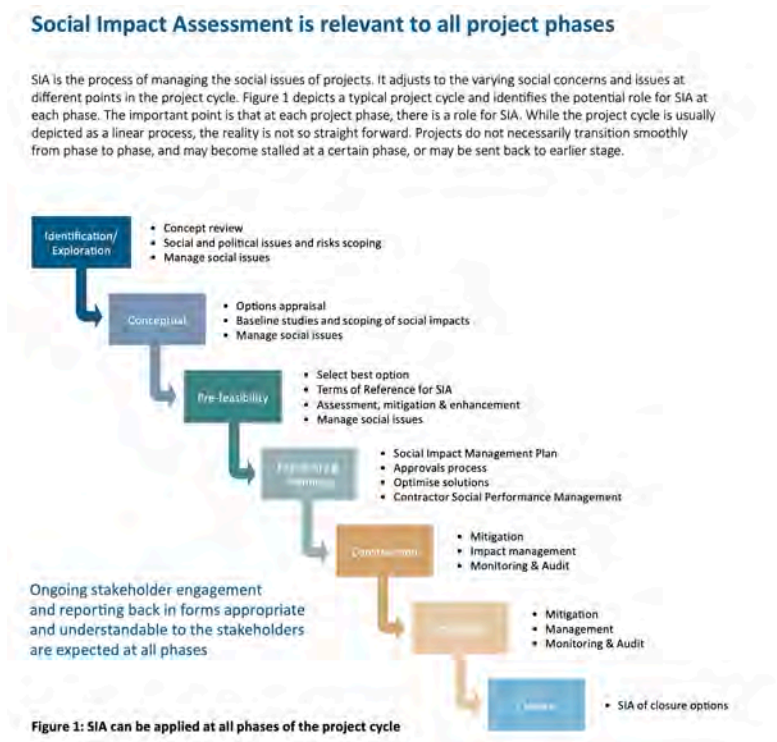
The International Association for Impact Assessment defines social impact assessment as:

'...the processes of analysing, monitoring and managing the intended and unintended social consequences, both positive and negative, of planned interventions (policies, programs, plans, projects) and any social change processes invoked by those interventions'.

(Waka Kotahi 'Social Impact Guide')

Important to earning a social licence to operate is to treat communities with respect. Meaningful, transparent and ongoing community engagement practices from the earliest stages of any intervention are essential to build trust and respect. The key values and principles of SIA are specified in the International Principles for Social Impact Assessment. The established principles of SIA include: the objective of SIA and the project should be to contribute to the empowerment of vulnerable groups in the community; a gender lens should be applied in all assessments; and that respect for human rights should underpin all actions.

(International Association for Impact Assessment 2015).



7. Tahunanui High Density

High density and medium density on Tamaki Street hillside makes no sense. There is no bus service, there are no shops or amenities close by, and pedestrians will be forced to cross a busy main road and there has been slippage all along that hillside.

Tahunanui hill needs to remain a general residential zone.

8. High Density in the Inner City

I have no problem with slightly higher density in the inner city and inner city fringe. This is where the higher density design should start.

Residential neighbourhoods should be protected, there is no need for the zoning and rules to change.

Appoint an Urban Development Agency as suggested by the Nelson Tasman 2050 proposal.

For a successful intensification policy, NCC must design comprehensive neighbourhood plans first - these are plans that give some certainty about the form and location of future buildings, open space areas for outlook and privacy, future public and private green spaces, play areas, potential new laneways and so on. Interestingly, our current Future Development Strategy spells out the need for such neighbourhood plans already. (Timo Neubauer)1A - Housing and Business Development Capacity Assessment 2021

9. Airbnb's

We have got [whole house] Airbnbs being used for people visiting, and motels being used for Nelson locals to live in. These houses need to return to the private rental market. This issue also adds to the problem we have in Nelson. NCC need to get tough and these Airbnb operators should be under the same rules as Motels, this has become an unregulated environment. Airbnb's should be liable for commercial rates, commercial insurances, inspections for a building warrant of fitness, just the same as Motels. This problem needs to be addressed and resolved and will go some way toward helping our rental shortage.

10. Infill

Infill housing should be permitted subject to the current resource consent process and daylight angles. Are there ways to keep the cost down to make this a more attractive option to residents?

Summary - What I wish to see happen:

- Withdraw PPC 20 and undertake community engagement
- Appoint an Urban Development Agency
- Prepare a Social Impact Assessment
- Make infill housing a viable option
- Regulate Airbnb's to be in similar category as Motels
- Assess higher density in the City Centre and City Fringe and assess individual sites that would allow multi story buildings without compromise to neighbouring daylight angles.
- After community consultation the new PPC29 should then go out to the public for submissions, appointing an independent panel of 5 commissioners, like Christchurch City Council, and make all paperwork readily available for viewing by any resident of Nelson
- Include correct population growth statistics and keep the existing daylight angles provision
- Stay within our tier 2 responsibilities and enable at least sufficient development capacity to meet expected demand

Other References:

Nelson Mail Sep 14 2023 - "Move to back on housing plan change for Nelson fails"

Nelson Mail Oct 28 2023 - "Plan Change 29 creates 'fear and loathing' in city"

Nelson Mail Oct 23 2023 - "Can we intensify Nelson without a design"

appendix 22 comprehensive housing development			
AP22.ii overview	oppose	<i>Comprehensive Housing provisions allow for developments to be a restricted discretionary activity (and non-notified) provided the site is located in the Residential Zone – Comprehensive Area.</i>	Reject and oppose
AP22.1 definitions	oppose	<i>Comprehensive housing development means three or more residential units, located in the Residential Zone - Comprehensive Area, Standard Area and Lower Density Area only</i>	Reject and oppose
AP22.2.i	oppose	<i>I oppose the high density zoning</i>	Reject and oppose
AP22.8.i	oppose	<i>I oppose the high density zoning</i>	Reject and oppose
AP22.8.ii	oppose	<i>I oppose the high density zoning</i>	Reject and oppose as submitted in opposition to PPC30
AP22.8.iii	oppose	<i>I oppose the high density zoning</i>	Reject and oppose

Chapter 2 Meaning of words MW.iii Definitions			
Urban Zone	oppose	<i>means one or more of the Residential Zone, General Residential Zone, Medium Residential Zone, High Density Zone, Inner City Zone, Suburban Commercial Zone, Industrial Zone or any part of the Open Space and Recreation Zone that is surrounded by one or more of these zones.</i>	reject - I oppose the addition of general, medium and high density zones
Taonga	oppose	<i>means (in relation to papakāinga in the General, Medium Density and High Density Residential zones, Inner City and Suburban Commercial zones) treasure, property. Taonga are prized and protected as sacred possessions of the tribe.</i>	reject - I oppose the addition of general, medium and high density zones
Tipuna/ tupuna	oppose	<i>means (in relation to papakāinga in the General, Medium Density and High Density Residential zones, Inner City and Suburban Commercial zones) ancestors.</i>	reject - I oppose the addition of general, medium and high density zones

Chapter 3 administration			
AD11.2 Description of zones and areas		<i>Residential Zone Lower Density Area Comprehensive Area Standard Area General Residential Zone Medium Density Residential Zone High Density Residential Zone Rural Zone Lower Density Small Holdings Area Higher Density Small Holdings Area Inner City Zone City Centre City Fringe Suburban Commercial Zone Leisure Area Industrial Zone Tahunanui Area Port Area Nayland Road South Area Saxtons Area Airport Area</i>	reject - I oppose the addition of general, medium and high density zones

Chapter 5 District wide objectives and policies			
DO1.1.1.ii	oppose	<i>oppose change in zonings</i>	reject - I oppose the addition of general, medium and high density zones
DO1.1.3.ii	oppose	<i>oppose change in zonings</i>	reject - I oppose the addition of general, medium and high density zones
DO1A	oppose	<i>in entirety</i>	reject - I oppose the addition of general, medium and high density zones
DO2.2	oppose	<i>in entirety</i>	reject - I oppose the addition of general, medium and high density zones
DO13A.3.1.iv	oppose	<i>NCC Urban Design panel - why remove, that is exactly what the City needs. Nelson Tasman 2050 have offered a proposal for a joint Nelson - Tasman Urban Development Agency</i>	reject removal
DO13A.6.2.vi	oppose	<i>As above. I like the idea of having a joint Nelson -Tasman Urban Development Agency that is independent from council.</i>	reject removal
DO13A.6.3.v	Amend	<i>As above. I like the idea of having a joint Nelson -Tasman Urban Development Agency that is independent from council. Council staff can help facilitate.</i>	amend to include a joint Nelson-Tasman Urban Development Agency
DO14.2.i	oppose	<i>At the same time, increasing the density of housing may reduce the amenity values experienced by some people by enabling a greater height and scale of buildings closer to neighbouring boundaries.</i>	Reject as enabling reduced amenity of neighbouring properties
DO15.1 Urban form	oppose	<i>urban zone boundaries referenced</i>	reject
DO16.1.1.i - DO16.1.1.vii Residential Zone	oppose	<i>I oppose the new zones</i>	reject
DO16.1.1.xxi	oppose	<i>reference the changed zoning</i>	reject
DO16.1.1.xxii	oppose	<i>reference zones on planning maps</i>	reject

Chapter 7 Residential zone			
REd.9, REd.10 & REd.11	oppose	Oppose high intensification residential zones as they stand	Reject and oppose the zone changes and everything that has been altered to enable reduced sunlight and enjoyment to the neighbouring properties
RE1 living style	oppose all	Oppose all as a lot of detail and includes the zoning changes	Reject and Oppose all until zoning is re-addressed with community consultation.
REr.17A- REr.36	oppose all	Need to investigate in more detail as it relates to the zone changes and intensification. In particular anything the reduces the sunlight and privacy of neighbouring properties.	Reject and oppose the zone changes and everything that has been altered to enable reduced sunlight to neighbouring properties
REr.64 - REr.66 Airport Effects Control Overlay	oppose	Oppose all REr.64, REr.65, REr.65A and REr.66 as also opposed and rejected plan 30 and therefore reject this provision under PPC30 submission	Reject and oppose as submitted in opposition to PPC30
Chapter 11 Open Space and Recreation Zone			
OSr.53 - OSr.54 Airport Effects Control Overlay	oppose	Oppose all OSr.53 and OSr.54 as also opposed and rejected plan 30 and therefore reject this provision under PPC30 submission	Reject and oppose as submitted in opposition to PPC30
appendix 15 daylight admission (residential)			
AP15.ii	oppose	<i>The daylight controls for the General Residential Zone, Medium Density Residential Zone and High Density Residential Zone are specified in Chapter 7 – Residential Rules.</i> Where is Chapter 7 as mentioned on this online version?	reject - I oppose the addition of general, medium and high density zones
AP15.2	oppose	<i>The daylight controls set out in this appendix do not apply to the General Residential Zone, Medium Density Residential Zone and High Density Residential Zone. Daylight controls are included in Chapter 7 – Residential Rules for the General Residential Zone, Medium Density Residential Zone and High Density Residential Zone.</i> <i>Mention of Chapter 7 - Residential rules and mention of the new zones which I oppose as they stand.</i>	reject - I oppose the addition of general, medium and high density zones

RMA Submission Form for Publicly Notified Plan Change 29

Return your submission by 4pm on
Tuesday 19 September 2023 to:

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

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

OFFICE USE
Submission No: S879
Date Received Stamp: 31/10/2023
NDOCs No: 539570224-18153

*Required

Submitter Details

Full Name*	Tim King (Mayor)		
Organisation	Tasman District Council		
Contact Person	Jeremy Butler		
Postal address*			
Telephone*		Email*	Jeremy.butler@tasman.govt.nz

Trade Competition*

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

☒ I/we **could not** gain an advantage in trade competition through this submission.

☐ I/we **could** gain an advantage in trade competition through this submission. *if yes, please complete the following:*

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☒ I/we **are not** directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

Council Hearing*

☐ I/we **do not** wish to be heard in support of my/our submission.



I/we wish to be heard in support of my/our submission. If yes:

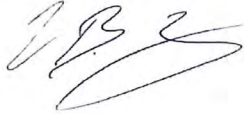
☐ I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings.

Public information

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

RMA Submission Form for Publicly Notified Plan Change 29

Signature of Submitter*



Nelson City Council
Te Kaunihera o Whakatū

Date*

31 October 2023

RMA Submission Form for Publicly Notified Plan Change 29

Note:

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

Submission point	Position	Submission	Relief sought
Entire Plan Change	Support the plan change	Overall, Tasman supports the intent and general direction of PC29. However, there are some key areas where	To confirm the plan change with amendments as follows
Residential			
S.32 evaluation on residential capacity	Support the residential component of the plan change, including all residential zones proposed, since these implement the envisaged densities of the adopted Future Development Strategy. We request further analysis be provided on commercially feasible and realistic housing capacity, and infrastructure-ready capacity to be realised by PC 29.	TDC strongly supports the residential component of PC29, since this will assist both regions in meeting demand for housing, address unmet demand and helps to implement the Nelson Tasman Future Development Strategy 2022. 55% of the housing capacity for the next 30 years for the region is to be situated in Nelson and a comprehensive plan change such as PC29 is therefore required and has been needed for some years. We have some questions about the capacity plan change 29 may yield, as detailed below. Feasible and realistically expected to be realised housing capacity - s.32 report page 43 explains that under scenario 3 total capacity of the plan change amounts to 5-9 times the level of long term demand. Long term demand being 8,000 houses. The Market Economics report suggests that their model calculates the net additional dwellings theoretically enabled under the proposed planning provisions. The s.32 evaluation explains that scenario 3 of the model is the option that most closely reflects PC29 as notified. Scenario 3 concludes PC29 will provide capacity for 61,200 dwellings, of which 60,200 are from infill and redevelopment and 1,000 from greenfield. Such a yield is more than double the existing housing stock in Nelson, which is approximately 23,000 dwellings according to the Market Economics report. The extent of constraints analysis undertaken for the yield model is unclear, other than it has not considered commercial feasibility or realistically expected to be realised capacity. It is suggested that sites with geotech issues have been excluded. Have sites used for schools, reserves or other community infrastructure been excluded? Have land	- Both a commercial feasibility and realistically expected to be realised capacity review of the plan enabled capacity from PC29 to be undertaken, in order to ascertain the likely (i.e realistic) yield of PC29. This will then enable a more realistic forecast of capacity to permit monitoring of the implementation of the Nelson Tasman FDS. It will also enable TDC to complete the 2024 Housing and Business Assessment jointly with NCC once a clearer picture of capacity is provided. This assessment is for Government and forms part of Councils' LTPs 2024-2034. - A review of the plan change be undertaken to ascertain also how much capacity is infrastructure ready and how much capacity requires servicing to be budgeted in the Long Term Plan or under the new Water Services Entity.

		parcels below say 400 sq m been excluded? Have sites that have already been redeveloped recently been excluded? It is not clear how the capacity of the proposed zoned areas in PC29 relate to the capacity proposed in the Nelson Tasman Future Development Strategy (FDS). Over the 30 year period, slightly more capacity is to be provided in NCC than TDC under the FDS, therefore it is important that TDC understands any capacity changes from those assumptions, as previously discussed. It is clear that some intensification areas in the FDS are proposed for lower density in PC29 and the reverse is also true, but overall capacity changes are not clear. Infrastructure ready housing capacity – PC 29 does not clarify how much plan enabled capacity is serviceable. The FAQs state that PC29 provides a theoretical yield that in parts of the city cannot be supported by current or planned infrastructure provision, while key areas are infrastructure ready. Section 3 of the Market Economics Assessment acknowledges that the capacity does not take into account the infrastructure constraints to development. While TDC supports PC29 in principle, it is not clear how much of the theoretical capacity is realistically capable of being implemented. Therefore PC29 may not in fact significantly contribute to overall housing capacity in the regions, which is of concern and contrary to the Nelson Tasman FDS objectives.	
Subdivision rules in Medium Density and High Density Residential Zones	Support the residential component, but request amendments	The subdivision rule RER.107 as notified allows for the subdivision of land in the Medium Density Residential Zone and the High Density Residential Zone as a controlled activity down to a minimum lot size of 200 square metres. This may result in the continuation of the fragmentation of land ownership. Land fragmentation is one of the key challenges that makes good-quality intensification more difficult. It is submitted that allowing ongoing fragmentation may make it increasingly difficult to transition to a well-functioning urban environment.	1. Amend the subdivision and land use rules to disincentivize subdivision and incentivize comprehensive redevelopment of sites. Essentially, subdivision and development of land that is suitable for comprehensive redevelopment into more efficient housing typologies should be discouraged through a more difficult rule

		In these two zones, there should be stronger incentives towards comprehensive redevelopment of sites, and barriers or disincentives to avoid undue fragmentation that will make future intensification and redevelopment harder. Retaining easy (controlled activity) subdivision on sites that are suitable for high-quality progressive intensification and achieving excellent urban design and efficient land use outcomes is not desirable. Such subdivisions would not be able to be challenged or declined and may result in significant missed opportunities that have effectively irreversible consequences (i.e. loss of large contiguous parcels of land).	framework.
Chapter 7 Urban design outcomes	Support the residential component, but request amendments	Consideration needs to be given to how urban design outcomes can be achieved in redevelopment proposals. There are some key urban design outcomes such as utilising rear lot laneway and vehicle access instead of front vehicle access. For example, terrace housing site widths 7m or less should be accessed from rear due to impacts on pedestrian use of footpath. Are there any triggers in the plan that require the implementation of best practice urban design? Can this be linked to a consent status? As part of Richmond on the Rise, Tasman is considering utilizing the Urban Design Panel to assess developments, and if a high quality design is confirmed, that a easier consent status is achieved. This would incentivize better design. Rubbish / recycling bin storage areas need to be considered for comprehensive housing developments, particularly with rear lanes.	1. Reconsider whether urban design assessment and outcomes are sufficiently included in the provisions.
Rule REr.18D Setbacks in Medium Density Zone	Support the rule, but request amendments	Clause REr.18D.5 (Explanation) states that "... recognizing that the rules do enable buildings to adjoin the boundary for part of the site." This Explanation cross references to the Other Yards in Rule REr.18E which doesn't appear to allow for any buildings to be located within the 1m side and rear boundary yards. This appears to be an inconsistency between the Explanation and the Rule and should be clarified.	1. Clarify the Explanation with respect to the Rule
Chapter 7 Daylight admission rules	Support the rule, but request amendments	It is not clear whether the recession plains identified are suitable when steep topography is taken into account. An exception should be considered for solar panels to enable easier installation on roofs	1. Reconsider recession plains to ensure the current rules are appropriate with topography 2. Amend the rules so that the standards do not

		which do not face north.	apply to solar panels.
Chapter 7 Residential rules – acoustic insulation	Request amendments	Acoustic insulation is an extremely important aspect of the success of medium density housing development. It is acknowledged that acoustic insulation is required for bedrooms in the Inner City Zone and Suburban Commercial Zone. However, it is considered that strong acoustic insulation requirements should be required for any developments which propose attached housing (e.g. apartments or terrace housing) in the General Residential, Medium Density Residential or High Density Residential zones.	Include appropriate acoustic insulation provisions for any development that includes attached housing.
Natural Hazards / Climate Change			
S32 Report Appendix 2E: Coastal flood scenarios	Support	TDC strongly supports the coastal flood mapping scenario applied in PC29, being a 1% AEP event, year 2130, SSP 8.5(H+) including Vertical Land Movement. This is consistent with Ministry for the Environment's 'Interim Guidance on the Use of New Sea-Level Rise Projections (2022)', the National Adaptation Plan, and TDC's coastal hazards work programme.	n/a
Natural Hazards provisions	Support	TDC supports PC29's risk-based approach to natural hazards management, including consideration of longer-term impacts from climate change such as sea level rise. TDC supports NCC's rationale to not include some residential parts of Nelson (e.g. the Wood, Maitai, Rocks Road, Tahunanui) within PC29 (which allows for intensification) due to the risk from current and future natural hazards (as stated in the FAQs). Where PC29 is proposing intensification of residential areas, TDC supports the approach to require resource consents for a range of activities (particularly residential buildings) where there are natural hazards considerations so the risks can be appropriately managed.	n/a
Papakainga			
REr.19V Schedule AA	Support	TDC supports the enablement of papakainga activities in residential zones. The definition provided in Chapter 2 for papakainga is also supported.	To retain the provisions
Transport			
AP10.4A	Support but suggest further analysis	The general provisions for requiring cycle parking are supported. However, it is questioned whether <u>on-site</u> cycle parking is appropriate in the Inner City Zone. This	Amend the provisions so that in zones where communal cycle parking facilities are more important, then this is

		would require all sites (including inner city shops) to provide cycle parking. It is suggested that on-street or communal cycle parking facilities are a more efficient way of providing. Further analysis should also be undertaken to see whether on-site cycle parking is appropriate in the Suburban Commercial Zone.	provided for in the rules.
AP10.4B	Support	End of trip facilities are supported	Retain the provisions
AP10.5A	Support	Electric vehicle supply equipment installation is supported	Retain the provisions
AP10.5B	Support	Lighting for parking spaces is supported	Retain the provisions
AP10.14A	Support with amendments	Maximum car parking numbers are supported, but consideration should be given to extending these requirements to the Suburban Commercial Zone. It is considered that SCZ is a key part of the NRMP framework for achieving a well functioning urban environment, and therefore the provisions should be extended to that zone, although the maximum car park numbers for that zone could be different to the Inner City Zones.	Retain the provisions with amendments to include Suburban Commercial Zone

Rec: 31/10/23
Submission: 5880
NOCCS: 539570224-18157

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

Environmental.planning@ncc.govt.nz

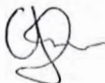
Full Name: Master Christopher Geen

Address: 2

1

Telephone

Email: angela.christopher@xtra.co.nz

Signature of Submitter: 

Date: 31 October 2023

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

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

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

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

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

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

RMA Submission Form for Publicly Notified Plan Change 29 *Housing and Hazards*



31 October 2023

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

OFFICE USE
Submission No: S881
Date Received Stamp: 31/10/2023
NDOCs No: 539570224-18158

Submitter Details

Full Name ---
Organisation Manuka Street Hospital Limited
Contact Person Mark Lile
Postal Address Landmark Lile Limited, PO Box 343, Nelson 7040
Mobile Phone
Email mark@landmarklile.co.nz

Trade Competition

I/we **could not** gain an advantage in trade competition through this submission.

Council Hearing

I **do** wish to be heard in support of my submission.

I would **not** be prepared to consider presenting my submission in a joint case with others.

.....
Signature of Submitter
(or authorised person)

Dated: 31 October 2023

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

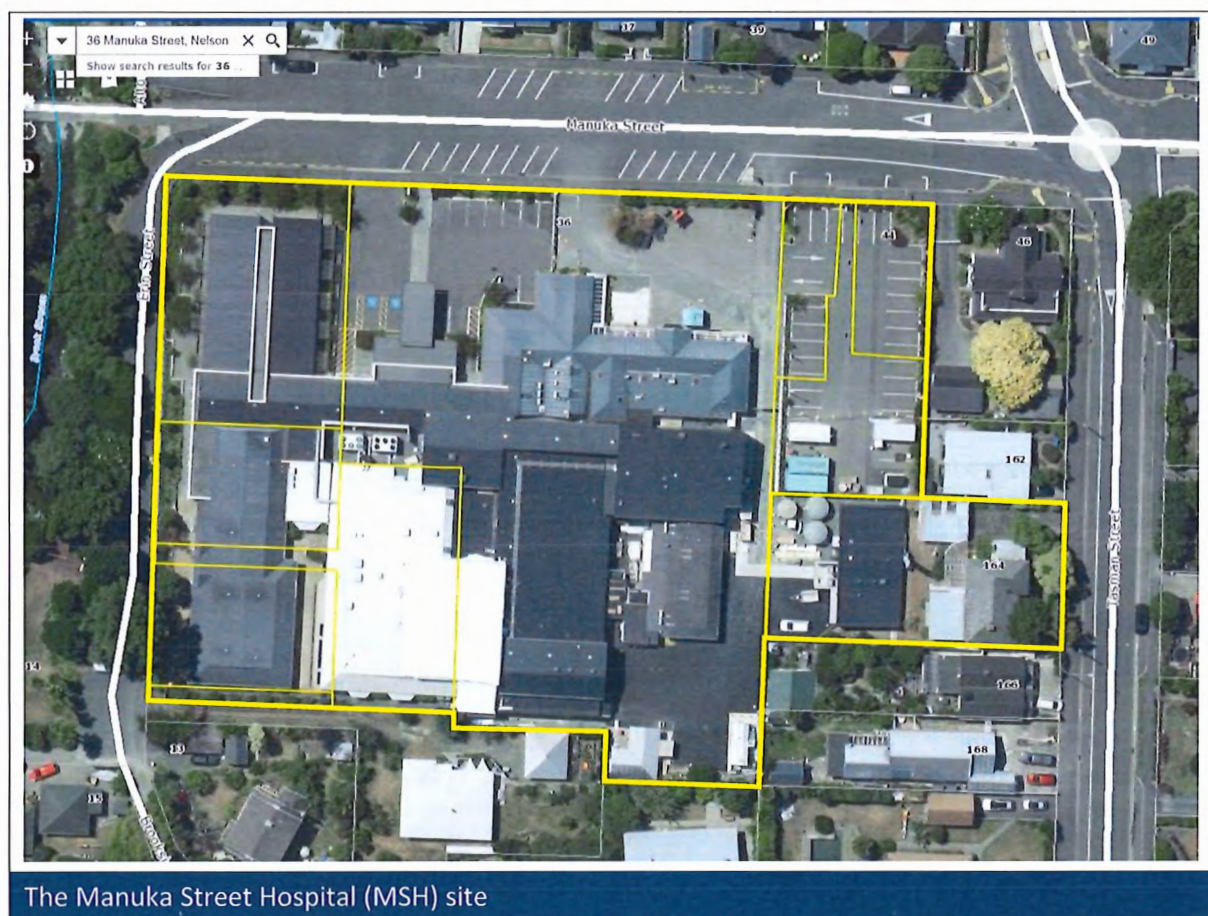
☒	Entire Plan Change	☐	Papakāinga
☒	Residential	☐	Transport
☐	Inner City and City Fringe	☒	Mapping
☐	Industrial	☐	Infrastructure
☐	Suburban Commercial	☐	Area outside of Plan Change
☒	Natural Hazards/Climate Change	☐	Subdivision
☒	Heritage	☐	Other

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

Our submissions and the relief sought are as follows:

Submission

This submission is made by Manuka Street Hospital Limited (MSHL) who own and occupy the land at 36-44 Manuka Street and also 164 Tasman Street, Nelson. Refer to aerial photo below.



The MSHL is a joint venture between Southern Cross Healthcare and Manuka Street Charitable Trust.

The MSHL supports PC29 (in part) in so far as it seeks to provide for the anticipated housing needs of the Nelson community as required by the NPS-UD. As set out below however, the MSHL has worked

closely with the Council since 2016, including making submission to the draft RPS (June 2016) and to the draft Nelson Plan (December 2020), to ensure that the Nelson Plan appropriately recognises and provides for the existing hospital activity on the site. Refer to **Attachment 1** for a copy of these submissions.

Significantly, and as set out clearly in the submissions, MSH is considered to be ‘regionally significant infrastructure’ being associated with Nelson Hospital. It was in that context that the MSHL were given the opportunity by NCC to have direct input into a set of Hospital Zone provisions alongside WSP (as consultants helping NCC with the draft Nelson Plan). This process extended over the period between February 2021 and September 2022. Whilst still in draft, significant progress was made well before PC29 to give effect to the wider requirements of the NPS-UD with the draft Hospital Zone provisions reaching a point of being complete and predominantly ready for notification. Refer to **Attachment 2**.

Earlier in 2023 MSHL became aware that NCC was planning to proceed with its housing plan change in isolation from the wider components of the Nelson Plan. Because of that the MSHL wrote to NCC on 10 July 2023 expressing concern of this narrowed approach (see **Attachment 3**). As further explained below, it is considered that progressing PC29 without provision for a hospital zone (or equivalent) does not:

- (a) Give effect to the wider requirements to “enable” social infrastructure, community services and business (all of which include hospitals) in accordance with the NPS-UD;
- (b) Enable the MSH to further develop as a part of supporting the growing needs of its population, being important “additional infrastructure” (NPS-UD, 1.4);
- (c) Align with Section 74(1)(ea) of the RMA which requires a district council to change its district plan ‘in accordance with’ a national policy statement and section 75(3)(a) of the RMA which requires that a district plan must ‘give effect to a national policy statement’;
- (d) Implement the NPS-UD as a whole, including taking into account other provisions which support increased residential intensification as a part of a well-functioning urban environment;
- (e) Achieve other important components of the NPS-UD such as Policy 10 and Objective 3.

Likewise, PC29 also involves a significant change to urban form and density within the High Density Zone immediately surrounding the subject site. While intensification is supported in principle, along with increase to the bulk and location standards, it is considered that leaving the Hospital Zone out of this process does not achieve the integrated management of resources. By not appropriately providing for the existing hospital this also creates a significant reverse sensitivity risk whereby the expectations of high density neighbours are enhanced, not to mention significantly increase the potential number of stakeholders involved in that separate process to enable a Hospital Zone on this site.

MSHL’s overall submission

Create and apply Hospital zoning

MSHL seeks that the MSH site is rezoned Hospital zone and that the provisions enclosed as **Attachment 2** are applied.

PC29 seeks to rezone the MSH site from Residential – Lower Density Area to the High Density Zone. While this necessarily applies more appropriate planning provisions than had otherwise been applied, this has been done as a consequence of intensification in Nelson. This means that the

standard provisions applying to residential development and development in residential areas have been applied. This approach does not recognise the functional and operational needs of hospital sites or recognise that they are 'regionally significant infrastructure'.

There is scope within PC29 for the Council to take this approach. MSHL provided a letter to the Council, on 10 July 2023, attached as Attachment x which explains the obligation on the Council to give effect to all of the provisions in the NPS-UD, including the requirements to "enable" social infrastructure, community services and business land to service the additional residential capacity anticipated under the NPS-UD. As explained in that letter, providing a Hospital zone through PC29 would be an appropriate way to enable the hospital development necessary to support an increase in the surrounding residential population and community and to enable a well-functioning urban environment as required to give effect to the NPS-UD.

MSH recognises that, to take a consistent approach, these provisions would also be applied to the Nelson Hospital site. Nelson Hospital will be provided an opportunity to be involved in PC29 through the further submission process (if it is not already involved).

Applying a bespoke set of rules to Manuka Street Hospital

In the alternative MSHL seeks that the Site is scheduled in the Plan (i.e it is identified in a schedule to the Residential Zone provisions and that specific provisions are applied to the Site through that schedule). This would mean that the High Density Zone would be retained with the addition of a bespoke schedule in the manner already forming part of the NRMP planning framework. The particular standards / rules that should make up this schedule can simply and readily be drawn from the draft Hospital Zone provisions.

The scheduling of the site would enable specific provisions in the Residential zone to apply or enable bespoke provisions where those are more appropriate. By way of example a specific permeable landscape rule would apply to recognise the need to efficiently develop the Hospital site.

This approach, to schedule specific sites, has been taken in relation to a number of other sites in the district, including Nelson Public Hospital.

In relation to Nelson Hospital, it has been recognised that "Nelson Marlborough Health Services Ltd (NMHS Ltd) does not have the ability to designate in the Plan. The scheduled site therefore makes provision for the operation of Nelson Hospital and related services. Relying just on existing use rights would be very limiting for the activity. The schedule allows for normal hospital and related activities, while ensuring that residential amenity is maintained at the boundaries of the site."

In our submission, the same reasoning applies to this Site.

For the reasons set out above, there is scope within PC29 to take this approach because of the broad mandate to give effect to the NPS:UD, and this approach aligns with the existing District Plan. MSHL seeks that the MSH site retains its High-Density Residential zone with the application of a bespoke schedule. A new schedule has been added as part of PC29 for Papakainga development in General, Medium and High Density Residential zones.

Alternative submissions and relief sought

If the Council is otherwise minded to continue to apply the High-Density Zone provisions, MSHL makes the submissions set out below which seek to retain the zoning with amendments to provide for the development of the hospital activities and buildings.

MSHL has requested a number of changes be made to PC29 as a part of giving effect to the NPS-UD as a whole, and to achieve the integrated management of resources in this part of the City, for the

benefit of not only the local environment and stakeholder, but also the wider regional population who rely on the critical services provided by MSH (now and in the future).

It is also noted here that with the removal of Volume 3 Planning Maps, submissions cannot directly relate to planning map numbers. This submission therefore relates to the information contained within the online *isoplan* version of the NRMP and PC29 as provided by link on the Council's website.

It is also requested that the summary of submissions prepared in the next phase be undertaken in such a manner that this be prepared and made available by *provision* using an appropriate electronic database. This submission identifies the specific provisions and the additional reasons for these submissions in the table that follows:

Planning Maps		
	Overlays	Support/oppose
Map	High Flood Hazard Overlay <u>Reasons</u> It is unclear why this overlay has been applied to the Manuka Hospital site. The application of the high flood overlay is opposed as a majority of this site is already occupied by a recently redeveloped hospital. That development was not assessed as being at high risk from any significant flood hazard. Likewise, the high flood hazard overlay is considered to be erroneous as this site could never be within an area of high velocity flows due to the amount of impervious surface area. <u>Relief Sought</u> Remove high flood hazard overlay from the Manuka Street Hospital site.	Oppose
Map	Flood Hazard Overlay <u>Reasons</u> As above, the application of the flood overlay is opposed as a majority of this site is already occupied by a recently redeveloped hospital which was not assessed as being at risks from any significant flood hazard. <u>Relief Sought</u> Remove flood hazard overlay from the Manuka Street Hospital site.	Oppose
Volume 1		
Chapter 2 MW.iii	Meaning of Words	Support/oppose
	Building Coverage <u>Reasons</u> Given the removal of the car parking requirements the proposed changes to the definition of building coverage are considered to be necessary and appropriate. <u>Relief Sought</u> Retain the proposed change to this definition.	Support
	Flood Area <u>Reasons</u> The proposed introduction of this definition combined with the associated rule framework creates a very complex set of provisions that are not simple to interpret / administer and are very likely to cause confusion. <u>Relief Sought</u> Simplify the flooding related provisions to provide for a less complex set of provisions that are easier to administer.	Oppose

	<i>Flood Path</i> Oppose <u>Reasons</u> The proposed introduction of this definition combined with the associated rule framework creates a very complex set of provisions that are not simple to interpret and are very likely to cause confusion. <u>Relief Sought</u> Simplify the flooding related provisions to provide for a less complex set of provisions that are easier to administer.
	<i>Floodway</i> Oppose <u>Reasons</u> The proposed introduction of this definition combined with the associated rule framework creates a very complex set of provisions that are not simple to interpret /administer and are very likely to cause confusion. <u>Relief Sought</u> Simplify the flooding related provisions to provide for a less complex set of provisions that are easier to administer.
	<i>Permeable landscaped area</i> Oppose in part <u>Reasons</u> Should the High Density Zone be retained or an alternative zone applied, the requirement for 20% permeable landscape area is opposed. The current MSH site contains 10% of permeable landscaped areas and adding another 10% would result in the loss of valuable land area. <u>Relief Sought</u> Delete definition, along with the rule, or change to 10% as this applies to the MSH site.

Ch.5	District wide objectives and policies	
DO2	Natural hazards	
DO2.2.1	<i>Identify areas susceptible to natural hazards</i> Oppose <u>Reasons</u> As explained above, the flood hazard areas have been identified without any ground truthing. This means that the MSH site is identified at being at a very high risk of flooding despite the land being developed and used as a hospital since 1966. The site was redeveloped in 2017 to extend the existing ward and upgrade the reception area. During the consenting process involved in that development no issue was raised in relation to flooding. Therefore, there is a risk that hazard overlays are being applied erroneously and without proper ground-truthing. <u>Relief Sought</u> Require a more detailed analysis to identify areas prone to flooding.	
DO2.2.4	<i>Flood hazard: subdivision, use and development in flood areas</i> Neutral <u>Reasons</u> In conjunction with submissions made on the flood hazards maps, definitions and rules, this policy has the potential to have a significant impact on the opportunity for the MSHL to develop in accordance with the Hospital Zone provisions that have been agreed. Much of the site is already occupied by a modern hospital redevelopment. Avoiding the hazard as directed by the policy is therefore not feasible, and nor is elevating future extensions given the practical needs of accessibility for acute care patients. <u>Relief Sought</u> As above.	

DO2.2.13.ii	Fault hazard: setback from fault zone	Support
Method (and associated Rules)	<u>Reasons</u> It is important to apply an appropriate setback from the fault zone. MSHL supports rules that require site specific assessments to be undertaken to recommend setbacks for new buildings and additions. This will ensure that the setback is context specific and means that the rules are unlikely to apply to redevelopment within a previous building footprint. <u>Relief Sought</u> This method is retained.	
DO16	Zones	
DO16.1.1.iv	High Density Residential Zone	Oppose
	<u>Reasons</u> This provision sets out the overarching goal of the High Density Residential Zone. If hospitals are not provided for a in a separate zone, they should be recognised as an important part of the High-Density Residential Zone. This is anticipated in the NPS-UD which provides at Policy 3.5 which provides that local authorities must be satisfied that additional infrastructure (which includes social facilities and hospitals) to service the development capacity likely to be available. Otherwise, the goal of the zone only anticipates “small-scale commercial activities, reflecting that an increasing residential population requires convenient access to services to meet their day-to-day needs.” <u>Relief Sought</u> Amend DO16.1.1.iv as follows (or words to similar effect): <i>The primary goal of the High Density Residential Zone is to provide the opportunity for high density housing in close walking distance to commercial services and community facilities. The zone enables a range of housing types, with a focus on more intensive forms of housing, including terraces and apartments at a variety of scales. The zone achieves a high density residential character by generally enabling residential buildings up to six storeys and requiring on site landscaped areas and private open space suitable to the housing types enabled. High density residential development is more intensive than typical low density areas and will result in a high degree of visual change to neighbourhoods. Subject to assessment through the resource consent process, the zone provides for small-scale commercial activities, and other community facilities, including hospitals and healthcare services, reflecting that an increasing residential population requires convenient access to services to meet their day-to-day needs.</i>	
Volume 2		
Ch.7	Residential Zone	
REd.10 Description	Residential	Oppose in part
	<u>Reasons</u> This description goes some way to recognising the changing nature of the urban environment as a result of the NPS-UD but further amendments are required to recognise that existing amenity values need to be viewed in the context of this change. <u>Relief Sought</u> Amend DO16.1.1.iv as follows (or words to similar effect): <i>Over time, the appearance and character of neighbourhoods will change as new development occurs, to achieve the planned built character of the zones as described in the objectives and policies. Collectively, General Residential, Medium Density Residential and High Density Residential zones enable a variety of housing densities, in a variety of forms, including detached, semi-detached, terraced housing and apartments. Residential development will be supported by necessary social facilities. In achieving the planned built character of the zone, development will have regard to the amenity values of existing residential sites, acknowledging that this existing environment is changing and this is more challenging as the density of development increases.</i>	

RE1.8 Policy	High Density Residential Zones Oppose <u>Reasons</u> The proposed High-Density Residential Zone policy seeks to “efficiently enable high density residential living that increases housing supply and choice on land within close walking distance of the Inner City and Suburban Commercial zones with a planned built character of residential buildings generally up to six storeys; with supporting small scale commercial activities”. No justification has been provided why the Council only considers small-scale commercial activities to be appropriate. If the Council continues to apply the HDR zone provisions to hospitals, these policies must recognise the importance of hospitals in Nelson. <u>Relief Sought</u> Should the High Density Zoning be retained on the MSH site, amend Policy RE1.8 as follows (or words to similar effect): <i>Efficiently enable high density residential living that increases housing supply and choice on land within close walking distance of the Inner City and Suburban Commercial zones with a planned built character of residential buildings generally up to six storeys; with supporting small scale commercial activities and other community facilities, including hospitals and healthcare services.</i>
RE2.4 Policy	Privacy and outlook Support <u>Reasons</u> This policy is proposed to ensure that outlook and privacy is not unduly impacted while recognising that this must be considered in the context of the changing residential environment and the planned built character of an area. <u>Relief Sought</u> Retain as notified.
RE2.5 Policy	scale Oppose <u>Reasons</u> PC29 will fundamentally change the current bulk and location rules in the NRMP and yet PC29 does not propose any significant change to policy RE2.5. It is considered that RE2.5 must also be amended as the bulk and location rules will lead to significant impacts on the building character and amenity of residential areas. <u>Relief Sought</u> Amend Policy RE2.5 as follows (or words to similar effect): <i>The size and scale of buildings, structures, and activities should be compatible with the planned built character and amenity of the residential areas while recognising the functional and operational requirements of activities and development including that they:</i> (a) <i>May require greater density than the planned urban character to enable efficient provision of services;</i> (b) <i>May have activity specific layout and internal amenity.</i>
RE2.6 (and i-iv) Policy	Non-residential activities Oppose <u>Reasons</u> PC29 does not propose any changes to RE2.6 relating to non-residential activities. It currently requires “no activity should have effects significantly greater than the normal residential use of any property, unless they can be avoided, remedied or mitigated”. As explained above, to give effect to Objective 3 of the NPS-UD, the Council must enable more community services to be located in certain areas of urban environments, including where there is high demand for housing or business land. In this case, the Council has identified that there is a high demand for housing in the proposed high-density residential areas so it follows that the policies in the Plan should be updated to reflect this new directive. <u>Relief Sought</u> Amend Policy RE2.6 as follows (or words to a similar effect): <i>Development must be in keeping with an areas’ changing planned urban character No activity should have effects significantly greater than the normal residential use of any property, unless they can be avoided, remedied or mitigated</i>

	Rules – High Density Residential Zone	
RER.19C	Site coverage	Support in part
	<u>Reasons</u> The current MSH site contains 52% site coverage with 10% landscaping.	
	<u>Relief Sought</u> If the HDRZ is continued to apply to the MSH site, this standard should be specifically excluded from applying to the site.	
RER.19E	Other yards	Support
	<u>Reasons</u> This rule (and new zone) effectively replaces the current yard rule. This rule is supported.	
	<u>Relief Sought</u> Retain change.	
RER.19H	Permeable landscaped area	Oppose
	<u>Reasons</u> This rule requires 20% permeable landscape areas. While this may be appropriate on sites used for residential purposes, this zone anticipates non-residential activities as well. Requiring 20% permeable landscape areas does not allow for the efficient development of sites for non-residential activities such as hospitals. By way of example, the current Hospital has 10% permeable area. The addition of a further 10% permeable land would be a significant loss of valuable land resource.	
	<u>Relief Sought</u> Delete this rule, or amend it to require 10% permeable landscaped areas where non-residential activities are undertaken or specifically on the MSH site.	
RER.19J	Maximum building height	Support
	<u>Reasons</u> The MSHL supports the need for intensification to give effect to the NPS:UD and so also generally supports an increase in building height to help enable that.	
	<u>Relief Sought</u> Retain this rule.	
RER.19K	Daylight admission	Support in part
	<u>Reasons</u> This new rule will substantially change the daylight amenity received on residential sites in the High Density Zone. However any change within the High Density Zone must also be equally applied to the site, including within a bespoke schedule or Hospital Zone.	
	<u>Relief Sought</u> Either: (a) Retain rule; or (b) Apply as a part of a Schedule or Hospital Zone.	
RER.19O	Non-residential activities (excluding home occupations)	Oppose
	<u>Reasons</u> This rule effectively retaining the current discretionary activity status for non-residential activities. This is generally supported. However, the assessment criteria which is applied is the same as in the standard area and lower density residential areas (RER.20.4). In MSHL's view non-residential activities contemplated in the lower density area and high density area are, and should be, considered differently; the types of non-residential activities, their scale and their density will differ. It is therefore appropriate to have separate criteria applied to each.	
	<u>Relief Sought</u> Amend the rule so that it does not apply to hospitals and healthcare activities; and Apply a separate assessment criterion to non-residential activities in the High-Density Residential zone. This criteria should be focused on recognising the degree of change which will be enabled.	

New REr.19OA	<u>New rule: Hospital and healthcare activities</u> <u>Reasons</u> If the Council choose not to apply a specific Hospital Zone to the MSH site, it is appropriate and necessary for Hospitals to be specifically recognised as permitted activities and for their development to be restricted discretionary activities with an appropriate list of matters of discretion. <u>Relief Sought</u> A hospital and healthcare activity is a permitted activity. The development of a hospital or healthcare activity is a restricted discretionary activity. Discretion is restricted, for the standard(s) not met, to the matters explained in Attachment 2. A hospital and healthcare activity that contravenes one of these standards is a restricted discretionary activity. Discretion is limited to the effects of breaching the relevant standard.
REr.19S	<i>Maximum building length</i> Oppose <u>Reasons</u> This proposed rule has been designed to address the planned residential intensification and is not appropriate for the MSH site. The recently redeveloped MSH includes largely one large building that has been incrementally redeveloped and extended. The current building is already significantly more than 22m in length. <u>Relief Sought</u> If a bespoke approach is not taken in relation to the MSH site, MSHL seeks that an exception is made so that this rule does not apply to the MSH site.
REr.19T	<i>Buildings adjoining a historic heritage precinct or scheduled building</i> Opposed <u>Reasons</u> Whilst it is accepted that development may impact on adjacent heritage buildings, this rule substantially reduced permitted height down to 8m across the entire property in these circumstances. This does not take account of the variable width / scale of properties. Nor does the rule address the distance the heritage item may be from an adjoining property boundary. As a result, the 8m standard should only apply to the part of the site immediately adjoining. <u>Relief Sought</u> Amend the rule to apply the 8m height to the area within 10m of the physical heritage item.

	Rules relating to overlays on Planning Maps	
RER.73C	<i>Fault Awareness Overlay – New Residential units</i>	Support
	<u>Reasons</u> The Fault Awareness overlay applies to the part of the site located at 176 Tasman Street, being on the eastern frontage of the site. <u>Relief Sought</u> Retain rule.	
RER.74A	<i>Liquefaction Hazard Overlay – Building or Network Utility</i>	Neutral
	<u>Reasons</u> This new rule requires resource consent for building in this Overlay, with support from an appropriate technical report. <u>Relief Sought</u> Amend the rule by providing specifically for non-notification and without the need to obtain affected person approvals.	
RER.83B	<i>Flood Areas except Flood Paths or Floodways – Building and below ground swimming pools</i>	Oppose in part
	<u>Reasons</u> This rule essentially requires resource consent for anything more than a very minor addition within the flood areas. The identification of the MSH site within the Flood Area is opposed, in any event, the rule also opens the door for highly complex and expensive flooding assessment for most development proposals. <u>Relief Sought</u> Amend the rule by providing specifically for non-notification and without the need to obtain affected person approvals.	
RER.83C	<i>Flood Areas except Flood Paths or Floodways – Fence, wall, retaining wall, outside storage</i>	Oppose
	<u>Reasons</u> The identification of the MSHL site within the Flood Area is opposed. Given this, and the rules proposed around retaining walls and fencing, this rule is opposed also. <u>Relief Sought</u> Delete rule.	
RER.83E	<i>Flood Areas except Flood Paths or Floodways – Earthworks</i>	Oppose
	<u>Reasons</u> The identification of the MSHL site within the Flood Area is opposed. Given this, and the rules proposed around retaining walls and fencing, this rule is opposed also. <u>Relief Sought</u> Delete rule.	

Volume 3		
AP10	Standards and terms for parking and loading	Support/oppose
AP10.4A.1	<i>Parking spaces for cycles</i> <u>Reasons</u> This new rule requires 1 visitor parking space per 20 beds and 1 secure long stay cycle parking space per 15 beds. <u>Relief Sought</u> Retain change.	Support
AP10.4B	<i>End of trip facilities</i> <u>Reasons</u> This new rule requires showers, accessible showers, and changing rooms for staff associated with the number of cycle and micro mobility parking spaces provided. MSHL considers this to be a positive method of enhancing useability of facilities and supports this requirement. <u>Relief Sought</u> Retain change	Support

4 December 2020

Nelson City Council
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Dear Maxine,

draft Whakamahere Whakatu Nelson Plan Feedback
Manuka Street Hospital

The Manuka Street Hospital (MSH) appreciates this opportunity to provide feedback on the draft Whakamahere Whakatu Nelson Plan (*dWWNP*) at this informal phase of the planning process. The MSH has in fact become involved at each phase of the planning process to date, including providing written feedback on the draft Regional Policy Statement in June 2016. See Attachment 1.

Given the importance of the MSH in the provision of surgical services to Nelson and Tasman, feedback on the draft RPS was that:

"(2) While the MSH is currently on land zoned for Residential purposes, and whilst the draft RPS does not deal with the matter of specific zoning, MSH contends that this site should be the subject of a specific Schedule of rules that appropriately provide for and enable future growth of this regionally significant hospital facility" (22 June 2016)

Background

The MSH has been providing surgical services to the Nelson community since the early 1900's and has been on the current site since 1966.

In 2013 the former Trust Hospital entered into a joint venture partnership with Southern Cross Hospitals Limited – and so the new *Manuka Street Hospital* was formed. The Manuka Street Trust Hospital Board was then renamed as Manuka Street Charitable Trust 2013, and this Trust retains a 50% share in the hospital.

Southern Cross Hospitals Limited (SCHL) was established in 1979 and is the largest national network of private surgical hospitals in New Zealand with its prime purpose of providing high quality and affordable healthcare. A majority of the SCHL hospitals are located immediately adjacent to or within residential areas, which is considered to be a reflection of the compatibility of these facilities with residential activities / environments.

In 2015 the MSH commenced a master planning exercise which took over a year to complete given the complexities that needed to be considered. This provided an opportunity to address many of the inefficiencies and outdated features of the hospital, while also ensuring modern standards of care, resilience and safety are achieved.

As a part of implementing the initial stages of the masterplan / redevelopment, the MSH obtained resource consents in 2016 and 2018. Background information surrounding these projects can be found on RM185408 (November 2019) and RM165106 (November 2016). Construction of works approved as a part of RM165106 were completed in November 2017 while the construction activity for RM185408 is well underway and will be completed in November 2021.

MSH perform approximately 2700 operations per year, involving a wide range of surgeries, and with approximately 50% funded through ACC.

MSH is a significant health facility for the Nelson Tasman region in that it provides a back-up to Nelson Public Hospital (NPH); MSH has the only other fully-equipped theatres in the region that can provide surgery under general anesthesia, with in-patient facilities. In the event that NPH theatres are out of action, MSH is on standby; MSH and NPH have a Memorandum of Understanding to this effect. The value in this arrangement is that most surgeons and anesthetists work in both hospitals and are therefore familiar with the MSH set-up, should an emergency eventuate. Further, in the event of disaster, NPH has statutory powers under the Emergency Management Act, which allow them to commandeer MSH facilities and resources. MSH has a direct radio-telephone link with NPH; MSH staff have received Coordinated Incident Management training at the expense of NPH to assist in disaster planning, response and recovery for the region. MSH has provided a base for Red Cross and NMDHB training as a Community Based Assessment Centre (CBAC). MSH regularly holds Emergency Management training with the Nelson Tasman Civil Defense, New Zealand Fire Service and St John Ambulance. The Hospital works to promote community values and provide social cohesion by actively integrating into programs to support community health and wellness. MSH currently has a contract, through NMDHB, to deliver colonoscopies for the national bowel screening program.

Both MSH and NPH share expensive surgical equipment and emergency supplies (e.g. Dantrolene for malignant hypothermia). In addition, MSH has the only other large-capacity sterilizers in the region; MSH provides sterilization services on a regular basis during times of corrective maintenance and is on standby for preventative maintenance. At time of acute bed shortage at NPH, MSH assist by taking patient transfers from their surgical ward to free up beds. MSH has also performed operations on contract to NPH to reduce waiting list times.

MSH is therefore *of critical importance* to health and wellness of the region (Nelson and Tasman community); MSH provides surgery that cannot be obtained elsewhere, reduces pressure on public hospital waiting lists and provides assistance to NPH when its facilities are out of action. The MSH is therefore a fundamental part of *regional hospital infrastructure*.

Nelson Resource Management Plan

The provision for non-residential activities in the NRMP has resulted in these important/essential activities being expressly contemplated in the residential zone and provided for as a discretionary activities. The planning framework is clearly set out within REd.5, RE1.2, RE2.6, RE2.8 and rule REr.20.

While resource consents have been obtained under this framework, the activity status has resulted in a number of expensive and inefficient processes. It was in recognition of these inefficiencies that the MSH sought, in its feedback to the draft RPS, specific recognition of the role and significance of the MSH by way of a specific schedule of rules.

The National Planning Standards

The Government introduced National Planning Standards to make council plans and policy statements easier to prepare, understand and comply with.

The first set of National Planning Standards, which came into force in May 2019, set mandatory requirements for district plans including standardised zones and zone descriptions. The purpose of the Planning Standards is to achieve national consistency for the structure, format, and content of plans. In particular, the Planning Standards provide that if an existing zone is consistent with the description of a zone in the planning standards, that existing zone must use that zone name. To achieve national consistency, the Planning Standards place an obligation on local authorities to ensure that the zoning applied throughout New Zealand complies with the Planning Standards.

The Planning Standards provide for a Special-Purpose Hospital Zone with a zone description of “Areas used predominantly for the operation and development of locally or regionally important medical, surgical or psychiatric care facilities, as well as health care services and facilities, administrative and commercial activities associated with these facilities.” This applies to both public and private facilities. It clearly applies to MSH as a regionally significant hospital facility.

As a result of the Planning Standards, the MSH site must be zoned Special Purpose Hospital. Hospitals have particular functional requirements, and it is appropriate that they have a special purpose zone that recognises this and provides for these community facilities to operate efficiently and meet the needs of the community.

The dWWNP zones the NPH as Special Purpose Hospital Zone, but does not apply this zoning to MSH.

I understand that SCHL is also consistently seeking a Special-Purpose Hospital Zone for its hospital facilities across New Zealand as the National Planning Standards are implemented.

draft Whakamahere Whakatu Nelson Plan (October 2020)

Then following provisions of the draft Plan are acknowledged:

- Chapter 10. Definitions.
 - “medical and health activity” (p39-40)
 - “hospital and healthcare activity” (p30-31)
 - “regionally significant infrastructure” (pp59-60)
- Chapter 20. Energy, Infrastructure and Transport.
 - The benefits of, and provision for, regionally significant infrastructure.
- Chapter 25. Significant Resource Management Issues.
 - Recognition of Nelson Hospital and the community services provided by the NTDHB.
- Chapter 60. Medium Density Residential Zone
 - MRZ-R4 Activity not listed in Rules MRZ-R5 to MRZ-R23.
 - MRZ-P8 Non-residential activities – provision for non-residential activities;
 - MRZ-R13 Medical and health activity.
- Chapter 73. Hospital Zone.
- Draft Planning Maps

Discussion and Feedback

For the reasons set out above, and to be consistent with the National Planning Standards, the MSH must be zoned Special Purpose Hospital..

The proposed Medium Density Residential Zone around the MSH is supported. This is also consistent with the NPH where the Special Purpose Hospital zone adjoins residential zones.

Specific provision for the MSH needs to be provided in the dWWNP to recognize the regionally significant role that it provides, including in Chapter 25 and Chapter 73. The MSH would be very happy to work alongside the Council to draft a set of appropriate provisions that specifically apply to the MSH in Chapter 73 to achieve this outcome.

Changes requested to the draft WWNP

- a) MSH be identified within the definition of regionally significant infrastructure, and with associated references within Chapters 20 and 25.
- b) MSH to be zoned Special Purpose Hospital with specific provisions included in Chapter 73 to apply to the hospital.

MSH appreciates the opportunity to provide feedback on the dWWNP, and would like the opportunity to discuss these matters raised in this feedback further.

Yours sincerely,



Mark Lile

Landmark Lile Limited

Resource Management Consultancy

cc.	Margaret Gibbs	margaret.gibbs@manukastreet.org.nz
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22 June 2016

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Dear Sir/Madam,

Draft Regional Policy Statement - Nelson Plan
Manuka Street Hospital Limited

Manuka Street Hospital Limited ('MSH') appreciates this opportunity to provide feedback on the draft Regional Policy Statement. On behalf of MSH, the following feedback is provided:

- (1) MSH works closely with Nelson Hospital (NMDHB) to ensure elective surgical demands are met. Likewise, MSH is also part of the emergency management plan for Nelson-Marlborough as agreed with the NMDHB. MSH is therefore a significant component of the regional health service and infrastructure. As a result, it is considered that MSH should be given recognition in Policy 2.1 of the draft RPS.

It is noted that "education facilities" are also listed in Policy 2.1 which provides support to the inclusion of "health services". However given the regionally significant context of Policy 2.1 this could be narrowed to "specialised health services, supporting NMDHB".

- (2) While the MSH is currently on land zoned for Residential purposes, and whilst the draft RPS does not deal with the matter of specific zoning, MSH contends that this site should be the subject of a specific Schedule of rules that appropriately provide for and enable future growth of this regionally significant hospital facility.

Please contact me if you have any queries.

Yours faithfully

A handwritten signature in black ink, appearing to read "Mark Lile".

Mark Lile
Landmark Life Limited
Resource Management Consultancy

Part 4

Area specific matters

Zones

SPZ – Special purpose zones

HOSZ – Hospital zone

Introduction

The Hospital zone applies to the Nelson Hospital (including Braemar) sites adjoining Waimea Road and Franklyn, Motueka, and Tipahi Streets. The [Nelson Hospital](#) is the primary medical facility for Whakatū Nelson and the Top of the South. [The Hospital zone also applies to the Manuka Street Hospital located on the corner of Manuka Street and Elm Erin Street. This Manuka Street Hospital is a regionally significant health facility which provides a range of health services for the city and wider region, which includes supporting -amongst other medical services- provides back up to Nelson Hospital.](#)

[The Hospital Zone is comprised of two separate precincts:](#)

[PREC20 – Nelson Hospital – encompassing the Nelson Hospital located at Waimea Road.](#)

[PREC21 – Manuka Street Hospital – encompassing the Manuka Street Hospital located at Manuka Street and Erin Street.](#)

Objectives

HOSZ-01 Role of Nelson Hospital [\[DP\]](#) and Manuka Street Hospital

[The on-going operation and development of Nelson Hospital and Manuka Street Hospital are regionally significant hospital and healthcare activities that provide for the health and well-being of the community are recognised and facilitated.](#)

[HOSZ-02 Nelson Hospital and Manuka Street Hospital's operational and functional needs](#)

[Nelson Hospital and Manuka Street Hospital's special operational and functional needs are enabled, while ensuring the adverse environmental effects of activities undertaken at each hospital are avoided, remedied or mitigated.](#)

[HOSZ-03 Current and future use of Nelson Hospital and Manuka Street Hospital](#)

[The safe and efficient operation, maintenance and repair, or upgrading and expansion of Nelson Hospital and Manuka Street Hospital are not constrained or compromised by other activities.](#)

[HOSZ-02-04 Character and amenity \[\\[DP\\]\]\(#\) \(Nelson Hospital\)](#)

The Nelson Hospital site will continue to be characterised by:

1. a range of small to large scale buildings;
2. inter-connected accessways and parking areas; and
3. stands of established vegetation and open space that assist in softening the interface with and mitigating adverse amenity value effects on surrounding residential areas.

HOSZ-O53 Character and amenity (Manuka Street Hospital)

The Manuka Street Hospital site will ~~continue to be~~ characterised by:

1. a range of small to medium scale buildings;
2. limited access points and onsite parking; and
3. Boundary landscaping to assist in softening the interface with and mitigating –adverse amenity value effects on surrounding residential areas.

Policies

HOSZ-P1 Activities anticipated [DP]

The Hospital zone provides for a range of hospital and healthcare activities that meet the needs of the Whakatū Nelson and the wider Tasman and Marlborough communities.

HOSZ-P2 Activities discouraged [DP]

Discourage the establishment of activities in the Hospital zone unrelated to the ongoing operation and further development of hospital and healthcare activities.

HOSZ-P3 Adverse effects [DP]

Require hospital and healthcare activities to maintain the amenity values of, and mitigate adverse effects on the amenity values of adjacent Residential zones by:

1. ensuring that carpark, loading and service areas incorporate landscaping;
2. ensuring outdoor storage areas are either not visible or are screened from adjoining sites;
3. providing fencing and screening;
4. ensuring that activities are set back from road and Residential zone boundaries; and
5. restricting helicopter landing and take-off activities to emergency events or short-term construction projects except for Manuka Street Hospital where there will be no helicopter landing.

HOSZ-P4 Buildings [DP]

Ensure that where new buildings are proposed in the Hospital zone:

1. their height, scale and bulk:
 - a. is visually mitigated by site topography or the location, design and appearance of the building;
 - b. avoids visual dominance of, and any adverse shading and privacy effects on neighbouring sites; and
 - c. enables efficient use of the site and the functional needs of the building to be met; and
2. they are set back from the boundaries of the site so as to:
 - a. minimise adverse impacts on activities on adjacent Residential zone sites including potential loss of views, visual impact, odour, noise and shading; and
 - b. provide visual mitigation through:
 - i. their positioning in relation to the site's topography, unless topographical or operational constraints make a setback impracticable;
 - ii. their design and appearance; and
 - iii. the use of planting or landscaping.

HOSZ-P5 Parking and outdoor storage areas [DP]

Ensure that where [new](#) parking areas and outdoor storage areas are proposed:

1. they are located away from adjacent site and road boundaries;
2. fencing, landscaping or other screening is incorporated to minimise visual effects when viewed from roads or an adjoining property;
3. safe access of traffic to and from the site (including reverse manoeuvring onto roads) is provided; and
4. adequate and convenient space is provided to meet the parking and storage requirements.

HOSZ-P6 Helicopter landing and take-off areas ~~[DP]~~([Nelson Hospital](#))

Where helicopter landing and take-off activities are proposed:

1. consider the extent to which the location, nature, character and intensity of helicopter landing and take-off activities will have potential adverse effects on amenity values of surrounding Residential zones; and
2. acoustic privacy (including night time quiet) is maintained.

Rules

Rule interpretation and application

HOSZ-R1 [DP]

The rules that apply to activities in the Hospital Zone are contained in the activity status table and standards table as follows:

1. HOSZ-R4 to HOSZ-R7; and
2. HOSZ-S1 to HOSZ-S14.

HOSZ-R2 [DP]

The activity status tables and standards in the following chapters also **apply** to activities in the Hospital Zone:

1. AIR – Air; and
2. LF – Land and freshwater; and
3. EIT – Energy, infrastructure and transport; and
4. CON – Contaminated land; and
5. HAZS – Hazardous substances; and
6. NH – Natural hazards; and
7. TREE – Notable Trees; and
8. SUB – Subdivision; and
9. EW – Earthworks; and
10. LIGHT – Light; and
11. NOISE – Noise; and
12. SIGN – Signs; and
13. TEMP – Temporary activities; and
14. FMU1 – Stoke freshwater management unit.

HOSZ-R3 [DP]

The activity status tables and standards in the following chapters **do not apply** to activities in the Hospital zone:

1. CMA – Coastal marine area; and
2. CMAR – Coastal margins; and
3. NCFLC – Natural character, features and landscapes in the coastal environment; and
4. HH – Historic heritage; and
5. SASM – Sites and areas of significance to Māori; and
6. ECO – Ecosystems and indigenous biodiversity; and
7. NATC – Natural character; and
8. NFL – Natural features and landscapes; and
9. ASW – Activities on the surface of water; and
10. FMU2 – Matahi/Mahitahi/Maitai freshwater unit; and

11. FMU3 – Wakapuaka freshwater unit; and
12. FMU4 – Whangamoa freshwater unit; and
13. FMU5 – Roding freshwater unit.

Activity status

Rule	Use/Activity
HOSZ-R4	Activity not listed in HOSZ-R5 to HOSZ-R7
HOSZ-R5	Hospital and healthcare activity
HOSZ-R6	Building
HOSZ-R7	Helicopter landing and take-off

Activity	Permitted	Controlled	Discretionary/ Non-complying/ Prohibited
HOSZ-R4 Activity not listed in HOSZ-R5 to HOSZ-R7 [DP] Legal effect on notification: No	1. Not applicable.	2. Not applicable.	3. An activity not listed in HOSZ-R5 to HOSZ-R7 is a discretionary activity .
HOSZ-R5 Hospital and healthcare activity PREC20 PREC21 [DP] Legal effect on notification: No	1. A hospital and healthcare activity is a permitted activity , provided that: a. habitable buildings used for the activity must be connected to a community water supply and the wastewater network; and b. stormwater from the site used for	2. Not applicable.	3. A hospital and healthcare activity that contravenes HOSZ-R5.1.c. is a restricted discretionary activity . Discretion is restricted, for the standard(s) not met, to the matters in: a. HOSZ-S2 Setback from RESZ– Residential

Activity	Permitted	Controlled	Discretionary/ Non-complying/ Prohibited
	the activity must not drain to any public road, except for secondary flow purposes; and c. it complies with the following standards: i. HOSZ-S2 Setback from RESZ – Residential zones and PREC10 – Neighbourhood park precinct; and ii. HOSZ-S5 Outdoor storage; and iii. HOSZ-S6 Landscaping of carparking, loading and service areas; and iv. HOSZ-S7 Parking and loading; and v. HOSZ-S8 Access; and vi. HOSZ-S9 Building over or alongside drains (piped or open) and water mains; and		zones and PREC10 – Neighbourhood park precinct; and b. HOSZ-S5 Outdoor storage; and c. HOSZ-S6 Landscaping of carparking, loading and service areas; and d. HOSZ-S7 Parking and loading; and e. HOSZ-S8 Access; and f. HOSZ-S9 Building over or alongside drains (piped or open) and water mains; and g. HOSZ-S10 Nelson Tasman Land Development Manual 2019 mandatory requirements: Transportation; and h. HOSZ-S11 Nelson Tasman Land Development Manual 2019 mandatory

Activity	Permitted	Controlled	Discretionary/ Non-complying/ Prohibited
	vii. HOSZ-S10 Nelson Tasman Land Development Manual 2019 mandatory requirements: Transportation ; and viii. HOSZ-S11 Nelson Tasman Land Development Manual 2019 mandatory requirements: Stormwater; and ix. HOSZ-S12 Nelson Tasman Land Development Manual 2019 mandatory requirements: Wastewater; and x. HOSZ-S13 Nelson Tasman Land Development Manual 2019 mandatory requirements: Water; and xi. HOSZ-S14 Nelson Tasman Land Development Manual 2019 mandatory		requirements: Stormwater; and i. HOSZ-S12 Nelson Tasman Land Development Manual 2019 mandatory requirements: Wastewater; and j. HOSZ-S13 Nelson Tasman Land Development Manual 2019 mandatory requirements: Water; and k. HOSZ-S14 Nelson Tasman Land Development Manual 2019 mandatory requirements: Telecommunicati ons, Electrical and Streetlighting. 4. A hospital and healthcare activity that contravenes HOSZ-R5.1.b. is a <u>restricted</u> discretionary activity. 5. A hospital and healthcare activity that contravenes HOSZ-R5.1.a. is a

Activity	Permitted	Controlled	Discretionary/ Non-complying/ Prohibited
	requirements: Telecommuni- cations, Electrical and Streetlighting.		non-complying activity.
HOSZ-R6 Building PREC20 PREC21 [DP] Legal effect on notification: No	1. The construction, alteration, addition or relocation of a building is a permitted activity , provided that: - habitable buildings must be connected to a community water supply and the wastewater network; and - stormwater from the site on which the building is located must not drain to any public road, except for secondary flow purposes; and - the building complies with the following standards: HOSZ-S1 Maximum height of buildings; and HOSZ-S2 Setback from RESZ – Residential zones and	2. Not applicable.	3. The construction, alteration, addition or relocation of a building that contravenes HOSZ- R6.1.c. is a restricted discretionary activity. Discretion is restricted, <u>for the standard(s) not met,</u> to the following matters: HOSZ-S1 Maximum height of buildings; and HOSZ-S2 Setback from RESZ – Residential zones and PREC10 – Neighbourhood park precinct; and HOSZ-S3 Setback from roads; and HOSZ-S4 Daylight admission; and

Activity	Permitted	Controlled	Discretionary/ Non-complying/ Prohibited
	PREC10 – Neighbourhood park precinct; and iii. HOSZ-S3 Setback from roads; and iv. HOSZ-S4 Daylight admission; and v. HOSZ-S5 Outdoor storage; and vi. HOSZ-S7 Parking and loading; and vii. HOSZ-S8 Access; and viii. HOSZ-S9 Building over or alongside drains (piped or open) and water mains; and ix. HOSZ-S10 Nelson Tasman Land Development Manual 2019 mandatory requirements; Transportation ; and x. HOSZ-S11 Nelson Tasman Land Development		e. HOSZ-S5 Outdoor storage; and f. HOSZ-S7 Parking and loading; and g. HOSZ-S8 Access; and h. HOSZ-S9 Building over or alongside drains (piped or open) and water mains; and i. HOSZ-S10 Nelson Tasman Land Development Manual 2019 mandatory requirements; Transportation; and j. HOSZ-S11 Nelson Tasman Land Development Manual 2019 mandatory requirements; Stormwater; and k. HOSZ-S12 Nelson Tasman Land Development Manual 2019 mandatory requirements; Wastewater; and

Activity	Permitted	Controlled	Discretionary/ Non-complying/ Prohibited
	Manual 2019 mandatory requirements: Stormwater; and xi. HOSZ-S12 Nelson Tasman Land Development Manual 2019 mandatory requirements: Wastewater; and xii. HOSZ-S13 Nelson Tasman Land Development Manual 2019 mandatory requirements: Water; and xiii. HOSZ-S14 Nelson Tasman Land Development Manual 2019 mandatory requirements: Telecommunications, Electrical and Streetlighting.		l. HOSZ-S13 Nelson Tasman Land Development Manual 2019 mandatory requirements: Water; and m. HOSZ-S14 Nelson Tasman Land Development Manual 2019 mandatory requirements: Telecommunications, Electrical and Streetlighting. 4. The construction, alteration, addition or relocation of a building that contravenes HOSZ-R6.1.b. is a <u>restricted discretionary activity</u>. 5. The construction, alteration, addition or relocation of a building that contravenes HOSZ-R6.1.a. is a non-complying activity.
HOSZ-R7 Helicopter landing and take-off <u>within PREC20</u>	1. The use of a site for the landing or take-off of helicopters is a permitted activity, provided	2. Not applicable.	3. The use of a site for the landing or take-off of helicopters that contravenes HOSZ-R7.1. is a

Activity	Permitted	Controlled	Discretionary/ Non-complying/ Prohibited
PREC20 [DP] Legal effect on notification: No	that the use of the helicopter is for: a. an emergency such as urgent patient care, saving life, firefighting, rescue; or b. construction, installation, inspection, or maintenance activities and is of duration no longer than 5 working days.		discretionary activity.

Standards

Standard	Use/Activity
HOSZ-S1	Maximum height of buildings
HOSZ-S2	Setback from RESZ – Residential zones and PREC10 – Neighbourhood park precinct
HOSZ-S3	Setback from roads
HOSZ-S4	Daylight admission
HOSZ-S5	Outdoor storage
HOSZ-S6	Landscaping of carparking, loading and service areas
HOSZ-S7	Parking and loading
HOSZ-S8	Access
HOSZ-S9	Building over or alongside drains (piped or open) and water mains

HOSZ-S10	Nelson Tasman Land Development Manual 2019 mandatory requirements: Transport
HOSZ-S11	Nelson Tasman Land Development Manual 2019 mandatory requirements: Stormwater
HOSZ-S12	Nelson Tasman Land Development Manual 2019 mandatory requirements: Wastewater
HOSZ-S13	Nelson Tasman Land Development Manual 2019 mandatory requirements: Water
HOSZ-S14	Nelson Tasman Land Development Manual 2019 mandatory requirements: Telecommunications, Electrical and Streetlighting

Activity	Standard	Matters that discretion is restricted to where the activity does not comply with this standard
HOSZ-S1 Maximum height of buildings within PREC20 [DP] Legal effect on notification: No	1. Must not exceed 20 metres.	2. The scale, form, design and appearance of the building. 3. Effects on the character and amenity of the surrounding area. 4. Effects on the health and amenity of neighbouring residential properties. 5. The extent to which (if any) contravention of the standard results from the raising of the building's floor level relative to ground level (and therefore the building overall) in response to flood hazard risks.
<u>HOSZ-S2</u> <u>Maximum height of buildings within PREC21</u> <u>[DP]</u> <u>Legal effect on notification: No</u>	<u>1. Must not exceed 12 metres</u>	<u>1. The scale, form, design and appearance of the building.</u> <u>2. Effects on the character and amenity of the surrounding area.</u>

Activity	Standard	Matters that discretion is restricted to where the activity does not comply with this standard
		3. Effects on the health and amenity of neighbouring residential properties. 4. The extent to which (if any) contravention of the standard results from the raising of the building's floor level relative to ground level (and therefore the building overall) in response to flood hazard risks.
HOSZ-S2S3 Setback from RESZ – Residential zones and PREC10 – Neighbourhood park precinct PREC20 PREC21 [DP] Legal effect on notification: No	1. Any building, storage area, vehicle parking area or vehicle access or manoeuvring area must be set back at least 3 metres from any RESZ – Residential zone or PREC10 – Neighbourhood park precinct boundary. 2. For Precinct 20 the full length of the boundary must be landscaped or fenced, or a combination of both, to a height of no less than 1.8 metres and, where landscaping is included, it must have an average depth of 2.5 metres along the length of the boundary. 2.3. For Precinct 21 the full length of the boundary must be landscaped or fenced, or a combination of both, to a height of no less than 1.8 metres and, where landscaping is included, it must have an average depth	3.4. The scale, form, design and appearance of the building or area. 4.5. Effects on the amenity of neighbouring residential properties or open space including dominance, character and privacy.

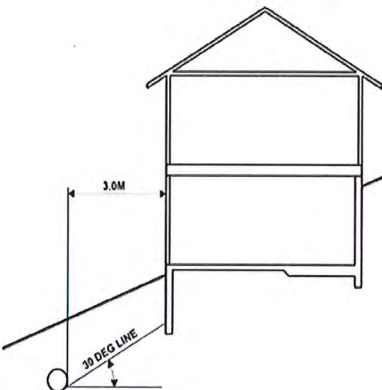
Activity	Standard	Matters that discretion is restricted to where the activity does not comply with this standard
	of 1 metre along the length of the boundary.	
HOSZ-S3S4 Setback from roads PREC20 PREC21 [DP] Legal effect on notification: No	1. In relation to any site boundary with a road: a. buildings must be set back a minimum of 3 metres from the road boundary; and b. a landscape strip having an average depth of not less than 1 metre must be established and maintained across the front of the site.	2. The scale, form, design and appearance of the building. 3. Effects on the character and amenity of the surrounding area. 4. Effect of any proposed mitigation measures.
HOSZ-S4S5 Daylight admission PREC20 PREC21 [DP] Legal effect on notification: No	1. Any building located on a site that adjoins a RESZ – Residential zone or PREC10 – Neighbourhood park precinct must comply with the requirements of APP41 – Daylight admission.	2. The location, scale, form, design and appearance of the building. 3. Effects on the amenity of neighbouring residential properties or open space and recreation areas. 4. The extent to which (if any) contravention of the standard results from the raising of the building's floor level relative to ground level (and therefore the building overall) in response to flood hazard risks.
HOSZ-S5S6 Outdoor storage PREC20 PREC21	1. Any outdoor storage area that can be viewed from an adjacent road frontage or an adjacent RESZ – Residential zone must be screened by either a 1.8 metre high fence or landscape planting	2. Effects on the character and amenity of the surrounding area. 3. The location and nature of the outdoor storage, including any alternative screening proposed.

Activity	Standard	Matters that discretion is restricted to where the activity does not comply with this standard
[DP] Legal effect on notification: No	capable of achieving the same height.	4. Effects on the health and amenity of neighbouring residential properties. 5. Effect of any proposed mitigation measures.
HOSZ-S6S7 Landscaping of carparking, loading and service areas within PREC20 <u>PREC20</u> [DP] Legal effect on notification: No	1. Car parking, loading, and service areas which are visible from the street frontage or adjoin a RESZ – Residential zone must provide a landscape buffer along the full length of the frontage that: a. has a minimum depth of 2 metres; and b. consists of a mix of trees, shrubs or ground cover plants (including grass).	2. Effects on the character and amenity of the surrounding area. 3. Effects on the visual and pedestrian amenity of the streetscape. 4. Effect of any proposed mitigation measures.
HOSZ-S8 Landscaping of carparking, loading and service areas within PREC21 <u>PREC21</u>	<u>1. Car parking, loading, and service areas which are visible from the street frontage or adjoin a RESZ – Residential zone must provide a landscape buffer along the full length of the frontage that:</u> <u>a. has a minimum depth of 0.5 metres; and</u> <u>b. consists of a mix of trees, shrubs or ground cover plants (including grass).</u>	<u>2. Effects on the character and amenity of the surrounding area.</u> <u>3. Effects on the visual and pedestrian amenity of the streetscape.</u> <u>4. Effect of any proposed mitigation measures.</u>
HOSZ-S7S9 Parking and loading <u>PREC20</u> <u>PREC21</u>	1. No on-site parking spaces are required to be provided. 2. Where parking is provided spaces must be provided and maintained on each site in	4. Consideration of a travel management plan. 5. The form, design and appearance of loading and

Activity	Standard	Matters that discretion is restricted to where the activity does not comply with this standard
[DP] Legal effect on notification: No	accordance with the design and layout standards set out in APP23 – Standards and terms for parking and loading and APP24 – Tracking curves. 3. Loading and manoeuvring space must be provided and maintained on each site in accordance with the design and layout standards set out in APP23 – Standards and terms for parking and loading and APP24 – Tracking curves.	manoeuvring areas. 6. Effects on the character and amenity of the surrounding area. 7. Effects on the safety and efficiency of the transport network. 8. Effects on traffic pedestrian movement and safety.
HOSZ-S8S10 Access PREC20 PREC21 [DP] Legal effect on notification: No	1. Vehicle access must be provided and maintained for each site in accordance with the standards set out in APP22 – Vehicle access and crossing standards. 2. No vehicle access is required to be provided and maintained to sites occupied exclusively by unstaffed network utility buildings.	3. The extent to which alternative methods of access for goods may be available, such as providing a goods loading zone adjacent to the site or restricting the times of delivery or dispatch of goods. 4. Effects on traffic and pedestrian movement and safety.
HOSZ-S9S11 Building over or alongside drains (piped or open) and water mains PREC20 PREC21 [DP] Legal effect on notification: No	1. Structures closer than 3 metres to a piped drain or water main of less than or equal to 300mm diameter must be located no closer than 1 metre measured horizontally from the near side of any public unsleeved water main or common private or public sewer or stormwater drain. 2. Structures closer than 3	7. Physical accessibility to the pipe, open drain or water main. 8. Any ecological, amenity or recreational values associated with any open drain. 9. The ground/floor type and design used to provide quick and easy removal to provide the ability to access any pipe

Activity	Standard	Matters that discretion is restricted to where the activity does not comply with this standard
	metres to a piped drain or water main of greater than 300mm in diameter must be located no closer than 1.5 metres measured horizontally from the near side of any public water main, or common private or public sewer or stormwater drain. 3. Structures closer than 3 metres to a drain of 150mm or less in diameter may be located within 1 metre or directly over a common private or public drain; providing that: a. the length of pipe or drain built over is no more than 6 metres in length; and b. there are no changes in direction or junctions in the portion of the drain built over; and c. the length of drain built over is re-laid using a continuous length of pipe without joints, sleeved inside a 225mm diameter class 4 concrete pipe; and d. there is a minimum 6 metre clear length and 3 metre clear width and 1.8 metre clear height at one end of the sleeve to allow replacement of the pipe; and	for maintenance and repair. 10. The depth of concrete/permanent surface floor over any pipe. 11. Alternative locations for any pipe and methods of emplacement.

Activity	Standard	Matters that discretion is restricted to where the activity does not comply with this standard
	e. the pipes are not water mains or pressurised pipelines. 4. Buildings, swimming pools or fences must not be located within 3 metres of the top of bank of an open drain. 5. In all cases, any structure may overhang the line of the pipe or drain, provided the structure is cantilevered or is an eave and the height to the underside of the structure above ground level is not less than 1.8 metres where the required pipe or drain is greater than 150mm in diameter or width. 6. In all cases, any structure located within 3 metres, measured horizontally, from the near side of the pipe or drain must have the base of the foundations deeper than a line drawn at 30 degrees from the horizontal from the invert (bottom) of the pipe or drain, or between 30 degrees and 45 degrees if the design has been certified by a suitably qualified engineer (see HOSZ – Figure 1: Foundation depth). HOSZ – Figure 1: Foundation depth	

Activity	Standard	Matters that discretion is restricted to where the activity does not comply with this standard
	 The diagram shows a cross-section of a building with a gabled roof. A horizontal dimension line indicates a width of 3.0M. A vertical line extends from the base of the building, and a diagonal line is drawn from the base of this vertical line to the corner of the building's footprint. This diagonal line is labeled '30 DEG LINE'.	
HOSZ-S40S12 Nelson Tasman Land Development Manual 2019 mandatory requirements: Transportation PREC20 PREC21 [DP] Legal effect on notification: No	1. All provided transport infrastructure must comply with the following mandatory standards in Chapter 4 Transportation of the Nelson Tasman Land Development Manual 2019: a. Design Process 4.3.1; and b. Network layout Form and Function Design 4.4.1 – 4.4.7; and c. Design for the Speed Environment 4.5.1 – 4.5.2; and d. Transport Cross-Sections 4.6.1 – 4.6.7; and e. Batter Slope, Bridge and Retaining Structure Design 4.7.1 – 4.7.4; and f. Road Geometry 4.8.1 – 4.8.5; and g. Intersection Design 4.9.1 – 4.9.3; and	2. The nature, character and intensity of any adverse effects of the non-compliance. 3. Location. 4. Design and layout. 5. Alternative locations and methods. 6. The relevant matters in Chapter 4 Transportation of the Nelson Tasman Land Development Manual 2019 including the stated performance outcomes, mandatory matters and good practice notes.

Activity	Standard	Matters that discretion is restricted to where the activity does not comply with this standard
	h. Private Access and Crossing 4.10.1 – 4.10.7.2; and i. Clear Zones 4.11.1; and j. Parking 4.12.1.1 – 4.12.1.8; and k. Public Transport, Footpaths, Public Accessways and Cycle Facilities 4.13.1 – 4.13.6; and l. Road Marking Signs 4.14.1 – 4.14.2; and m. Streetscaping 4.15.1 – 4.15.5; and n. Construction General 4.16.1 – 4.16.4; and o. Structural Design of Pavement 4.17.1 – 4.17.6; and p. Subgrade 4.18.1 – 4.18.2; and q. Carriageway Surfacing 4.19.1 – 4.19.9; and r. Formation of Residential Lanes, Service Lanes and Private Ways 4.20.1; and s. Kerb Channelling 4.21.1 – 4.21.2; and t. Paths 4.22.1 – 4.22.4.	
HOSZ-S11S13	1. All provided stormwater infrastructure must comply with the following mandatory standards in Chapter 5	2. The nature, character and intensity of any adverse effects of the non-compliance.

Activity	Standard	Matters that discretion is restricted to where the activity does not comply with this standard
Nelson Tasman Land Development Manual 2019 mandatory requirements: Stormwater PREC20 PREC21 [DP] Legal effect on notification: No	Stormwater of the Nelson Tasman Land Development Manual 2019: a. Design Approach 5.3.1 – 5.3.2.2 and 5.3.4 – 5.3.8; and b. System Design 5.4.1 – 5.4.15.6 and 5.4.16 – 5.4.19; and c. Design Solutions 5.5.1 – 5.5.1.5 and 5.5.2 – 5.5.16; and d. Construction and Installation 5.6.1 – 5.6.8; and e. Inspection and Testing 5.6.9 – 5.6.12.	3. Location. 4. Design and layout. 5. Alternative locations and methods. 6. The relevant matters in Chapter 5 Stormwater of the Nelson Tasman Land Development Manual 2019 including the stated performance outcomes, mandatory matters and good practice notes.
HOSZ-S42S14 Nelson Tasman Land Development Manual 2019 mandatory requirements: Wastewater PREC20 PREC21 [DP] Legal effect on notification: No	1. All provided wastewater infrastructure must comply with the following mandatory standards in Chapter 6 Wastewater of the Nelson Tasman Land Development Manual 2019: a. Reticulation Design 6.3.1 – 6.3.3; and b. Layout and Alignment of Reticulation 6.4.1 – 6.4.5; and c. Pipe Design 6.5.1 – 6.5.8; and d. Seismic Design and Liquefaction 6.6.1; and e. Access Points 6.7.1 – 6.7.4; and	2. The nature, character and intensity of any adverse effects of the non-compliance. 3. Location. 4. Design and layout. 5. Alternative locations and methods. 6. The relevant matters in Chapter 6 Wastewater of the Nelson Tasman Land Development Manual 2019 including the stated performance outcomes, mandatory matters and good practice notes.

Activity	Standard	Matters that discretion is restricted to where the activity does not comply with this standard
	f. Pumping Stations 6.8.1 – 6.8.6; and g. Reticulation Construction and Installation 6.9.1 – 6.9.10; and h. Trenchless Technology 6.10.1; and i. Manhole Construction 6.11.1 – 6.11.2; and j. Tracer Tape 6.12.1 – 6.12.3; and k. Valve Painting 6.13; and l. Testing 6.14.1 – 6.14.7.	
HOSZ-S43S15 Nelson Tasman Land Development Manual 2019 mandatory requirements: Water PREC20 PREC21 [DP] Legal effect on notification: No	1. All provided water infrastructure must comply with the following mandatory standards in Chapter 7 Water of the Nelson Tasman Land Development Manual 2019: a. Reticulation Design 7.3.1 – 7.3.11; and b. Pipe Specifications 7.4.1 – 7.4.9; and c. Fittings 7.5.1 – 7.5.14; and d. Water Supply Connections 7.6.1 – 7.6.12; and e. Pumping and Storage 7.7.1 – 7.7.7; and f. Construction and Installation 7.8.1 – 7.8.11; and g. Trenchless Technology	2. The nature, character and intensity of any adverse effects of the non-compliance. 3. Location. 4. Design and layout. 5. Alternative locations and methods. 6. The relevant matters in Chapter 7 Water of the Nelson Tasman Land Development Manual 2019 including the stated performance outcomes, mandatory matters and good practice notes.

Activity	Standard	Matters that discretion is restricted to where the activity does not comply with this standard
	7.9.1 – 7.9.6.4.	
HOSZ-S14S16 Nelson Tasman Land Development Manual 2019 mandatory requirements: Telecommunications, Electrical and Streetlighting PREC20 PREC21 [DP] Legal effect on notification: No	1. All provided telecommunications, electrical and streetlighting infrastructure must comply with the following mandatory standards in Chapter 9 Telecommunications, Electrical and Streetlighting of the Nelson Tasman Land Development Manual 2019: a. Cable Protection 9.3; and b. Pipe and Duct Installation 9.4; and c. Access Points 9.5; and d. Approvals and Records 9.6.1.1 – 9.6.1.2; and e. Electrical Reticulation Design 9.7.1 – 9.7.4.3; and f. Electrical Reticulation Easements and Subdivision 9.8; and g. Easements 9.9; and h. Cabling, Ducting and Service Boxes 9.11.1 – 9.11.4.5; and i. Streetlighting 9.12.1 – 9.12.3.	2. The nature, character and intensity of any adverse effects of the non-compliance. 3. Location. 4. Design and layout. 5. Alternative locations and methods. 6. The relevant matters in Chapter 9 Telecommunications, Electrical and Streetlighting of the Nelson Tasman Land Development Manual 2019 including the stated performance outcomes, mandatory matters and good practice notes.

MinterEllisonRuddWatts.

10 July 2023

By Email: dennis.bush-king@ncc.govt.nz

Attention: Dennis Bush-King

Nelson City Council
PO Box 645
Nelson 7040

Inclusion of Hospital zone in Nelson City Council's upcoming plan change

1. Introduction

- 1.1 We act for Manuka Street Hospital Limited (**MSHL**), a joint venture between Southern Cross Healthcare Limited and Manuka Street Charitable Trust, which owns Manuka Street Hospital in Nelson.
- 1.2 Manuka Street Hospital is a private hospital at 36 Manuka Street, which performs approximately 3,000 procedures per year and provides critical support to Nelson Hospital, including by providing essential outpatient consultations and specialist assessments, reducing the pressure on public hospital waiting lists for procedures and providing supplies and staff when needed. Te Whatu Ora Nelson Marlborough currently outsources several procedures, including colonoscopies, orthopaedic procedures, and general surgery to MSHL.
- 1.3 Manuka Street Hospital is currently in the Residential zone under the Nelson Resource Management Plan (**NRMP**).
- 1.4 Nelson City Council is currently preparing a plan change to the NRMP to enable more intensive housing developments across Nelson City (**Plan Change**). We understand that one of the drivers for the Plan Change is the requirement for the Council to implement the National Policy Statement on Urban Development 2020 (**NPS-UD**).
- 1.5 On behalf of MSHL, we consider that the Council should introduce a Hospital zone in the upcoming Plan Change for the following reasons:
 - (a) The Council is required to give effect to all of the provisions in the NPS-UD, including the requirements to "enable" social infrastructure, community services and business land to service the additional residential capacity anticipated under the NPS-UD;
 - (b) Providing a Hospital zone in the NRMP, through the Plan Change, would be an appropriate way to enable the hospital development necessary to support an increase in the surrounding residential population and community and to enable a well-functioning urban environment as required to give effect to the NPS-UD; and
 - (c) In any case, MSHL has already been collaborating with Council planners on draft Hospital zone provisions, and this is an opportunity to bring those provisions into the NRMP sooner, for the benefit of the community.
- 1.6 We expand on these matters below.

2. **The Council is required to give effect to all of the provisions in the NPS-UD, including the requirements to “enable” social infrastructure, community services and business land to service the additional residential capacity anticipated under the NPS-UD**
- 2.1 Nelson City Council is a tier 2 local authority under the NPS-UD. As a tier 2 local authority, the Council is required to amend its district plan to give effect to the NPS-UD as soon as practicable, and was required to give effect to Policy 5 by 20 August 2022.¹
- 2.2 MSHL understands the Plan Change is intended to give effect to the NPS-UD, including Policy 5. Policy 5 requires that “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 MSHL understands that residential intensification is intended to be enabled under the Plan Change and to be the focus of the Plan Change.
- 2.4 However, Section 74(1)(ea) of the RMA requires a district council to change its district plan ‘in accordance with’ a national policy statement. In addition, but separate to this, s 75(3)(a) requires that a district plan must ‘give effect to a national policy statement’.²
- 2.5 It is therefore important and necessary that the Council amends the NRMP to give effect to all of the NPS-UD. The Supreme Court’s in *King Salmon* has determined that to ‘give effect to’ a national policy statement simply means ‘implement’. This is a strong directive, creating a firm obligation on those subject to it.³
- 2.6 In implementing the NPS-UD the Council cannot pick and choose or only focus on specific objectives and policies such as Policy 5. This was recently recognised by the High Court in *Southern Cross Healthcare Ltd v Eden Epsom Residential Protection Society Inc* where the High Court explained that, in the context of a private plan change, the Court was required to consider whether the proposed change would give effect to all the provisions of the NPS-UD.⁴ The High Court has confirmed that the Council cannot only give effect to Policy 5 in its Plan Change. The Council must implement the NPS-UD as a whole, and must take into account other provisions which support increased residential intensification as part of a well-functioning urban environment.
- 2.7 The objectives and policies of the NPS-UD are broader than just enabling residential development. The NPS-UD supports more intensive housing development within urban areas along with the businesses and community services that are required to support them. Only including housing intensification in the Plan Change may fail to give effect to Objective 1, Objective 3, Policy 2, Policy 10, Clause 3.3, and Clause 3.5 (further explained below) among other provisions.
- 2.8 In particular, the NPS-UD recognises the importance of hospitals and healthcare facilities in a number of ways. For example:
 - (a) *Additional infrastructure*: social infrastructure, such as schools and healthcare facilities, are recognised as additional infrastructure.⁵ Local authorities must be satisfied that the additional infrastructure to service the development capacity is likely to be available (Clause 3.5).⁶

¹ Clause 4.1 of the NPS-UD.

² Section 62(3) of the RMA.

³ *Environmental Defence Society v New Zealand King Salmon* [2014] NZSC 38, [2014] NZLR 593 at [77].

⁴ *Southern Cross Healthcare Ltd v Eden Epsom Residential Protection Society Inc* [2023] NZHC 948 at [88].

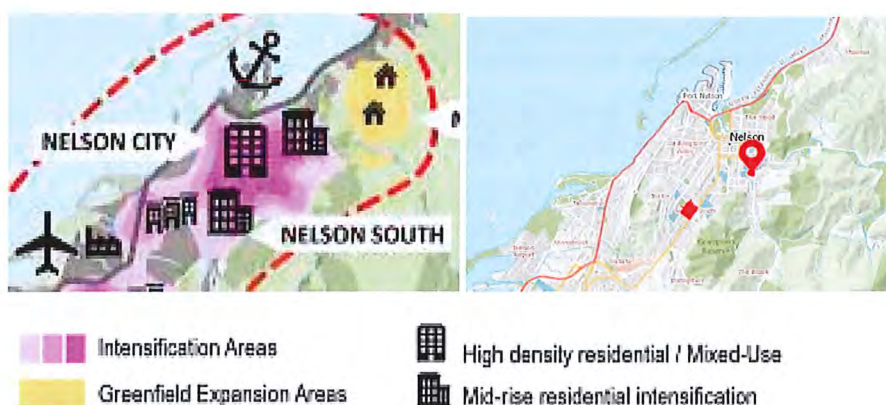
⁵ Interpretation 1.4 of the NPS-UD.

⁶ Clause 3.5 of the NPS-UD.

Local authorities are also required to engage with providers of additional infrastructure to achieve integrated land use and infrastructure planning (Policy 10).⁷

- (b) *Community services*: hospitals and healthcare are essential community services. Community services in the NPS-UD includes community facilities and commercial activities that serve the needs of the community.⁸ To give effect to Objective 3 of the NPS-UD the NRMP must enable more community services to be located in certain areas of urban environments, including where there is high demand for housing or business land.⁹
 - (c) *Business land*: the Plan must enable businesses to be located in certain areas of urban environments, including where there is high demand for business land.¹⁰ MSHL is in the business of providing healthcare services. The Hospital zone is 'business land' to the extent that it would allow for business use. The NPS-UD also seeks to provide at least sufficient development capacity to meet expected demand for business land over the short, medium and long term (Policy 2).¹¹
- 2.9 Therefore, MSHL seeks that the Plan Change recognises the critical role of supporting infrastructure as well as the need for residential development in Nelson.
3. **Providing a Hospital zone in the NRMP, through the Plan Change, would be an appropriate way to enable the hospital development necessary to support an increase in the surrounding residential population and community and to enable a well-functioning urban environment as required to give effect to the NPS-UD**
- 3.1 In MSHL's view, to give effect to the NPS-UD, the Plan Change should introduce appropriate provisions to support hospital development.
- 3.2 This would be consistent with the Council's Future Development Strategy, prepared in accordance with the NPS-UD, which anticipates an increase in residential and business intensification in Nelson City and Nelson South,¹² including in the areas surrounding Manuka Street Hospital and Nelson Hospital (shown in Figure 1 below).

Figure 1 – FDS and Figure 2 –map of Nelson showing Manuka Street Hospital and Nelson Hospital in red



⁷ Policy 10(b) of the NPS-UD.

⁸ Interpretation 1.4 of the NPS-UD.

⁹ Objective 3 of the NPS-UD.

¹⁰ Objective 3 of the NPS-UD.

¹¹ Policy 2 of the NPS-UD.

¹² *Nelson Tasman Future Development Strategy 2022-2052* (19 September 2022) at 10.

- 3.3 Providing a Hospital zone in the NRMP, through the Plan Change, would be an appropriate way to enable the hospital development. Hospitals are bespoke facilities with unique operational and functional needs. This means it is generally more efficient to expand existing hospitals than construct new hospitals. Providing a Hospital zone, and rezoning existing hospital facilities to be in that zone, would enable the ongoing use and more efficient upgrading and expansion of hospitals in Nelson, including Manuka Street Hospital and Nelson Hospital. It may also identify the appropriate location for future hospital developments.
- 3.4 This would support an increase in the surrounding residential population and enable a well-functioning urban environment as required to give effect to the NPS-UD because:
- (a) Hospitals provide significant social and economic benefits to communities, including allowing people to receive prompt treatment, return to good health and mobility and a normal life. For these reasons, hospitals are critical for New Zealand to provide for the health and wellbeing of our current and aging population, and enabling communities to provide for their health and wellbeing is within the definition of a well-functioning urban environment – Objective 1 of the NPS-UD.¹³
 - (b) Hospitals and healthcare facilities are needed in appropriate locations to support the increase in residential development enabled by the NPS-UD. As Nelson expands, both the public and private healthcare services need to grow to keep up with demand of a growing and aging population. MSHL understands Nelson Hospital is at full bed and theatre capacity, and this is not expected to lessen in the foreseeable future. Nelson's hospital capacity will therefore need to be expanded to meet the demand of an increased population, and that capacity may be provided in the private sector. Including a Hospital zone would enable the Council to ensure the NRMP can provide sufficient development capacity to meet demand as required by Policy 2.
 - (c) Manuka Street Hospital and Nelson Hospital are both currently in the Residential zone, which is not appropriate and does not reflect the important role of hospitals in a well-functioning urban environment. Where hospitals are located in the Residential zone, development is limited by the associated provisions which require an environment that is "principally residential in character" and require non-residential activities to be assessed as discretionary activities on a case-by-case basis. This is not consistent with:
 - (i) the requirement to "enable" all people and communities to provide for their wellbeing and health and safety under Objective 1;
 - (ii) the directive to specifically "enable" community services, including hospitals, in areas where there is demand for housing and business land under Objective 3; and
 - (iii) Clause 3.3 of the NPS-UD which requires every tier 2 local authority to provide at least sufficient development capacity to meet expected demand for business land. To be "sufficient" this development capacity must be "plan-enabled" which in the short term means the business use is a permitted, controlled or restricted discretionary activity. Not all existing hospitals (or their potential expansions), including Manuka Street and Nelson Hospitals are "plan-enabled".
 - (d) Having a specified Hospital zone would clearly provide for and ensure that there is appropriately zoned land for hospital and healthcare facilities to meet the healthcare needs of the current and future Nelson community (as there is already unmet demand). This would be consistent with the NPS-UD and provide identified locations for this type of development and would enable the Council to be satisfied that additional infrastructure to service the development capacity is available as reflected in Clause 3.3 and required under Clause 3.5 of the NPS-UD.

¹³ Objective 1 of the NPS-UD.

- 3.5 Overall, to implement the NPS-UD as a whole, the Council should include Hospital zone in the Plan Change to support an increase in the surrounding residential population and enable a well-functioning urban environment as required under the NPS-UD.
- 3.6 This approach would be also consistent with the National Planning Framework which includes a Hospital zone.
4. **MSHL has already been collaborating with Council planners on draft Hospital zone provisions, and this is an opportunity to bring those provisions into the NRMP sooner for the benefit of the community**
- 4.1 MSHL lodged a submission on the Draft Nelson Plan in December 2020 seeking to rezone Manuka Street Hospital to the Hospital zone and seeking that Manuka Street Hospital be identified within the definition of regionally significant infrastructure.
- 4.2 Since December 2021, MSHL (through its planner Mark Lile and counsel Bianca Tree) has been liaising with Reuben Peterson, Planning Team Leader at WSP, on the drafting of the Hospital zone provisions and we understand the provisions are close to complete. Mr Peterson also advised that he agrees that Manuka Street Hospital should be included in the definition of 'regionally significant infrastructure' under the Draft Nelson Plan.
- 4.3 Therefore, practically, the Plan Change provides an opportunity to bring the Hospital zone into the NRMP sooner, rather than waiting for the plan review to recommence. For the reasons set out above, the NPS-UD requires the Council to do this, and justifies the decision to do so.
- 4.4 On behalf of MSHL, we would appreciate the opportunity to discuss the matters raised in this letter further.

Yours faithfully
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