

Online submission

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Submitter No.	S385
Submitter Name	Ian Bowman
Submitter first name	Ian
Submitter middle name	Alexander
Submitter surname	Bowman
Submitter is contact	Yes
Email	ian@ianbowman.co.nz
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Heritage	Heritage schedule	Oppose in part	As per attached submission	As per attached submission

Documents included with submission

Document name	Plan change 29 submission - heritage
File	planchange29submissionheritage.pdf
Description	Submission on heritage provisions of plan change 29

IAN BOWMAN
B.A. • B.Arch • M.A. Cons Stud (York) • FIIZIA
Architect and Conservator



ian@ianbowman.co.nz
www.ianbowman.co.nz
P.O Box 1095 • Nelson • New Zealand

NRMP PROPOSED PLAN CHANGE 29

Issues relating to heritage and character

Submitter: Ian Bowman

I wish to be heard

1 Why is the identification and protection of heritage important?

There are many reasons why we should identify and protect places cultural heritage. These reasons include:

- 1.1 *Places of cultural heritage value:*
 - (i) *have lasting values and can be appreciated in their own right;*
 - (ii) *inform us about the past and the cultures of those who came before us;*
 - (iii) *provide tangible evidence of the continuity between past, present, and future;*
 - (iv) *underpin and reinforce community identity and relationships to ancestors and the land; and*
 - (v) *provide a measure against which the achievements of the present can be compared.*(ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value, 2010)
- 1.2 *"We don't inherit our cultural heritage from our ancestors but borrow it from our children" (paraphrasing an indigenous American proverb)"*
- 1.3 *"Memory and history give weight and purpose to our lives. And when we lose that history, we lose some of ourselves with it. As human beings, we care about our past. We honour our ancestors.*

When the time comes, future generations will look at what our generation has created: at our art, our literature, our science, our commerce.

I hope they will be able to judge that we made our world more peaceful and more prosperous, while dealing with threats such as climate change.

But as well as at what we created; they will also look at what we have protected.

Protecting our history and culture is not about retreating to the past; it is something we do for the future." (Australian Federal Environment Minister Tanya Plibersek, speech at the opening ceremony of the International Council on Monuments and Sites General Assembly, Sydney, 3 September 2023)

2 What is the contribution of built heritage to the built environment?

Heritage buildings, sustainability and intensification can easily co-exist.

- 2.1 According to census data the number of 2018 the total housing stock was 1654 dwellings¹. At the same time the number of listed heritage house in the NRMP comprised 227 or 1.37% of the total number of houses. Given that house numbers have risen over the five intervening years, this percentage has obviously declined. Therefore, there no significant conflict with retaining existing heritage houses and intensification of housing.

- 2.2 "The most sustainable building is the one that is already built" Carl Elefante, 2007

*Often people do not think of historic preservation and sustainability together. But they are natural partners. Historic Preservation can and should play a central role in fighting climate change. A clue to this can be found in simple definition of historic preservation. Richard Moe, a former president of the National Trust for Historic Preservation put it like this, "When you strip away the rhetoric, preservation is simply having the good sense to hold on to things that are well designed, that link us with our past in a meaningful way, and that have plenty of good use left in them."*²

- 2.3 Intensification and built heritage are not mutually exclusive. As Waikato Law Professor Alexander Gillespie writes:

Urban heritage is not about preserving history in a glass case. Historic urban areas should be allowed to evolve. Change and development should be welcomed if they facilitate and improve housing, and are compatible with the character of a historic area, the existing spatial layout, scale and section size. ICOMOS is very clear on this point: "The improvement of housing should be one of the basic objectives of conservation."

The risk, of course, is that gentrification can price original communities out of their own neighbourhoods, and ultimately alter the character of a place to the extent its heritage value has changed too. As ICOMOS states: "Retention of the traditional cultural and economic diversity of each place is essential, especially when it is characteristic of the place."

*None of these balancing acts is easy. But we need to avoid the perception of a binary choice between housing people and saving traditional urban areas. It is possible [and desirable] to do both"*³

¹ <https://figure.nz/chart/29hCzWLZoc1UQe6m>

² <https://www.stjosephmo.gov/DocumentCenter/View/14842/Historic-Preservation-and-Sustainability-PDF?bidId=#:~:text=In%202007%2C%20Carl%20Elefante%20wrote,and%20energy%20in%20existing%20buildings.>

³ <https://thespinoff.co.nz/society/06-06-2023/housing-and-heritage-dont-have-to-be-mutually-exclusive>

3 Summary of issues and outcomes recommended

There are four principle issues relating to built heritage where I oppose the proposed plan change. These comprise:

- That the proposed list has not been selected on the basis of a thematic historic review. This is a methodology that is considered best practice and used in the selection of heritage lists in many territorial authority plans throughout NZ. Therefore, the proposed list does not reflect the unique social, historical, cultural and physical history of Nelson. The proposed list maintains an extreme imbalance in the listing of buildings, with approximately 2/3rd of the current listings being pre-WWII houses.

This imbalance should be corrected with a complete review and new listings based on the Wilson *Thematic Historic Overview of Nelson*, 2011 by a multi-disciplinary team of heritage professionals including historians, conservation architects, heritage planners and archaeologists.

- That the plan change uses pairs of criteria which is not common or best practice and is likely to result in inaccurate or inadequate assessments. The criteria descriptions are inaccurate as the author of the criteria has conflated “significance” with values. Significance is the sum of values. In addition, the criteria lack a measure of value (relative degree) such as representativeness, level of authenticity, and rarity and they do not explain the threshold of values that must be reached for listing.

The criteria should be replaced with a single, fuller list of values and include measure of value criteria as well as the threshold for listing. The whole of the plan change will need to be reviewed as a consequence of changing the term “significance” to the correct term, “values” with an overall statement of significance, that summarises the heritage values.

- There are numerous listed buildings and groups of buildings that are proposed to be deleted. These include many inner-city properties in Bridge, Hardy, Russell and Rutherford Streets which retain sufficient heritage values and significance to be retained on the list. The imbalance in listings described above will be made considerably worse by these deletions.

These buildings and groups of buildings retain significant heritage values and should be retained on the list, but upgraded as Group B.

- The Church Hill view shaft, Inner-City Heritage Precinct and Wakefield Quay Heritage Precinct are proposed to be deleted.

The Church Hill view shaft, Inner-City Heritage Precinct and Wakefield Quay Heritage/Character Precinct should be retained as the reasons for their inclusion in the operative plan are unchanged.

Most other elements of the plan change relating to built heritage are either opposed in part or fully supported.

The plan change is silent on Māori and archaeological heritage. This should be addressed.

The heritage inventory, the basis for the selection of listed buildings in the plan, should be made publicly available, following the example of many other territorial authorities.

4 Detailed description of issues

The following are the main issues regarding heritage and character in the Proposed Plan Change (PPC) 2.

Issue	Support/oppose	Outcome requested
1 The current and proposed lists of individual buildings and heritage areas are not reflective of the unique social and physical history of Nelson and have not been compiled using industry best practice thematic overview methodology. Such a thematic overview was prepared by Dr. John Wilson <i>Thematic Historic Overview of Nelson City</i>, October 2011⁴. This review identified a serious imbalance of listings e.g., most listings being pre-1950 houses, with little or no post war housing, post war commercial buildings, industrial buildings etc. See appendix 4. Another example of best practice in the preparation of lists for district and regional councils can be seen in the Wellington City Council Thematic Heritage Study of Wellington, January 2013⁵. In addition, not all buildings in Dr Ann McEwan's recommended list in PPC29 are included. See appendix 1.	Oppose	Prepare a completely new list based on the Wilson document to address the serious imbalance of listings. The new list should consider previous heritage inventories (e.g., 1992, 2011) and their recommendations to Council for listings of individual heritage buildings and heritage areas (refer appendix 5) to ensure completeness and representativeness of key historical themes that define Nelson's unique physical, cultural and social history, character and development of Nelson city. It is best practice that heritage inventories such as that prepared for Plan Change 29 are completed by a multi-disciplinary team including historians, conservation architects (who have specialist training and expertise in architectural history as well as in building design and built heritage conservation, planners and archaeologists. Any review should include these experts. (e.g. Proposed Porirua District Plan) The new list should include buildings where there are no, or few examples as identified by Wilson including: • post war housing • post war commercial buildings, • industry, • health and social services, • social organisations, • military, • schools, • transport and communications, • post war churches, • significant Nelsonians, • significant architectural styles; and • ethnic minorities. (e.g., Braemar original building, 60 Franklyn Street which is the oldest psychiatric/psychopaedic hospital in New Zealand, 1874, design awarded to Charles Beatson after winning competition) (e.g., Historic areas including Bronte/Brougham Street, Wolfe Street and Mount Street, see appendix 5) (e.g., Plischke-designed house 6 Melrose Terrace⁶)

⁴ <http://www.nelsoncitycouncil.co.nz/assets/About-nelson/downloads/1176312-thematic-historical-overview-of-nelson-city-OCT2011.pdf>

⁵ <https://wellington.govt.nz/-/media/arts-and-culture/heritage/files/thematic-heritage-study.pdf>

⁶ <http://ernstplischke.blogspot.com/2012/11/in-may-2012-new-plischke-house-was.html>

Issue	Support/oppose	Outcome requested
2 The current and proposed list do not include all Heritage NZ listed places in Nelson.	Oppose	Include all HNZ listed properties in the plan (e.g., 18 Ngatitama Street).
3 The research and assessments of individual heritage buildings, existing and proposed, in some instances, are not accurate. Refer appendix 3. The entry on 68 Britannia Heights, my own house, suggests that my father built speculative housing. This is wrong which is curious given that the main reference used was the extensive Heritage New Zealand file on the building for its listing by them, which states correctly that these houses were designed for clients. On several properties there is speculation that they may have been designed by William Beatson. The supposed designs were not by Beatson As a known expert on the architect and author of a book on William Beatson, neither I nor my book were consulted.	Oppose in part	Review and correct all research to ensure it is accurate including removal of incorrect, conjectural references on buildings designed by William Beatson.
4 The criteria used to evaluate listed items is opposed. The author of the criteria has conflated the meanings of values and significance which are not the same. Significance is a summation of values. In addition, the criteria are grouped in pairs rather than listed singly which will likely result in areas of heritage value being missed or over emphasised in assessments, e.g., cultural and spiritual values and historical and social values can be greatly different. This is of particular importance when considering restricted discretionary consent applications such as assessments where the matters of discretion are restricted to impacts on heritage values. E.g. assessing the impacts of heights of buildings adjacent to built heritage. There is no consistency in the use of values or significance throughout the plan change.	Oppose	Replace the term significance with value and revise the listing criteria to single values based on Wellington Regional Policy Statement 21. Policy 21 (a) (i) "themes "is of particular importance where the list is revised according to the Wilson Thematic Overview. Ensure consistency in use of the terms values and significance.
5 The proposed listing criteria are not complete as they do not include how values relate to historic themes (see 1 above), measure (relative degree) of value such representativeness, level of authenticity, rarity and nor do they discuss the significance threshold for listing – (e.g., Exceptional, some, little or none).	Oppose	Include measure of value including representativeness, authenticity, and rarity and include a definition of and assess against a threshold used to include or exclude buildings. (e.g., Wellington Regional Policy Statement 21 which is an excellent example) ⁷ .

⁷ <https://www.gw.govt.nz/assets/Documents/2023/02/RPS-Full-Documents-Edited-December-2022-Updated.pdf>, pages 102-103

Issue	Support/oppose	Outcome requested
6 The heritage inventories need to be reassessed based on singly listed heritage values (replacing significance with values) as discussed above with an overall assessment of significance.	Oppose	Reassess all proposed and new listings (see 1 above) based on single heritage values with an overall assessment of significance (i.e., summary of values).
7 The review of the A, B and C listings to A and B only.	Support	A single- or two-tier ranking system of heritage listings is best practice in almost all territorial authority District Plans.
8 Proposed deletion of 23 Allan Street, 12, 44, 95-97, 111-113, 118-120, Bridge Street, 80, 84, 253-257, 258, 264-268, 280, 326 Hardy Street, 13 Fountain Place, 33, 1/39 A, 52, 53 Russell Street, 52 Rutherford Street, 109 Rutherford Street, houses in Fountain Place, 87 Grove Street, 20, 24, 26, 28, 32, 34, 36 Hastings Street, 89 Haven Road, 15, 23, 25, 30, 33, 1/39A, 49, 53 Russell Street, Rutherford Street, 52, 109 Rutherford Street, 349 Trafalgar Square, 335, 345, 369, 375, 411 Wakefield Quay (and others).	Oppose	These buildings individually and collectively continue to have significant heritage values and should continue to be listed on the NRMP as Group B buildings. Other buildings are proposed to be removed from the list for insufficient information. It is not known for example what research, site visit, or review of Council records took place, however, it is recommended that full research be undertaken to determine the heritage values or otherwise of these other buildings with full and complete research being completed. It appears in many instances that the buildings have been recommended for de-listing as they no longer appear as they did when first constructed. Buildings change over time with some changes enhancing significance. In many instances these buildings have had relatively minor changes such as render applied over weatherboards or dormer windows added, alterations that can be reversed meaning their integrity is maintained. A number of these places, in particular at the eastern ends of Hardy and Bridge Streets, were constructed in the 1860s and such a collection of buildings from the period is unique, in my experience, in NZ. With respect to commercial buildings, shop fronts are commonly modified and these modifications should not generally impact heritage significance. The recommendation for removal of these properties because of reversible modifications can be compared to the Nelson Mail building, which is recommended to retain category A. This is a façade only, having the interior removed and replaced. The fabric removed is irreversible. The recommendations for removal of these buildings show a narrow understanding of authenticity and integrity as well as heritage values and appear unreasonable and inflexible.

Issue	Support/oppose	Outcome requested
9 There has been some assessment of the settings of listed heritage buildings but which most often is limited to the section on which the buildings are located. This may not be appropriate on a number of sites where the property boundary and the setting are not the same.		Review the settings of all listed and proposed heritage places and include the actual extent of each setting where this does not equate to the property boundary (e.g., Proposed Porirua District Plan).
10 Height controls on adjacent buildings to listed heritage buildings is endorsed, however control of height only is a blunt instrument. An example is a small, single storey listed house on a flat or sloping site with a permitted 8m neighbouring house on a sloping site above the heritage item 1m from the boundary. This is likely to create significant adverse effects such as unsympathetic change to the surroundings of the heritage item, unsympathetic contrasts of scale and form, dominance, and reduction or obscuring of intervisibility. Other controls such as daylight admission and side and rear yard dimensions should be considered as height only does not consider individual site characteristics of listed heritage buildings and areas and the potential effects on heritage values. Protection of heritage becomes much more important when such significant changes to density and height are proposed which are designed to facilitate widespread changes in the current built form in large parts of Nelson.	Oppose in part	Review adjacent sites of all current and proposed listed properties to individually assess impacts of height, daylight admission, front, side and rear yard dimensions (e.g., Proposed Porirua City Council District Plan, where the panel accepted the view that height, form and location of buildings adjacent to heritage buildings should be unique to each place rather than just a height limit as proposed by Kainga Ora). This recommendation should then be applied to any new listings as per 1 above.
11 There is no public access to the heritage inventory.		Publish all information on currently listed and proposed listings to enable owners and others to review information on their properties (see 3 above) and to understand why they are are/proposed to be listed including updated and corrected information in PC 29-S32 Report Appendix 3N. Refer to Wellington City Heritage Inventory ⁸ .
12 The removal of the Church Hill View Shaft is opposed. Viewshafts can be a critical element in the recognition of views to and of significant heritage and other items that define the character of a city e.g. Wellington City viewshaft, chapter 13, appendix 11.	Oppose	The removal of the view shaft will remove views to and from the cathedral steps. This view is still a critical Nelson view, the purpose of the viewshaft has not changed and should be retained. ⁹ An argument put forward is that trees block out the view. The trees, none of which are listed, will die eventually, but the view and the cathedral will remain.

⁸ <https://www.wellingtoncityheritage.org.nz>

⁹ Refer appendix 6

Issue	Support/oppose	Outcome requested
13 The removal of the Inner-City Heritage Precinct and Wakefield Quay Heritage/character area is opposed.	Oppose	Another argument is that the viewshaft will prevent taller buildings being constructed. The purpose of the viewshaft is to maintain views from and of the cathedral and this purpose has not changed. The inner-city heritage precinct retains sufficient buildings of heritage value and those supporting the heritage buildings to warrant retention. See 9 above. Heritage NZ listed the Trafalgar Street Historic Area on 3 March 1995 and this is within the Upper Trafalgar Street Heritage Precinct. It is one of only four Heritage NZ Heritage Areas in Nelson. Similarly, retention of the Wakefield Quay heritage/character area is recommended as there are sufficient historic buildings along the Quay to warrant retention. Both these heritage areas should maintain or update the Design Guides relating to the heritage areas. Design guides should always be prepared by persons with an expertise in building conservation, architectural design and urban design.
14 There is no mention of ICOMOS regarding assessment of heritage values or appropriate objectives, policies, and rules.		Include a description and discussion of the ICOMOS NZ charter in the plan. (e.g., Wellington City District Plan).
15 There is no mention of conservation plans as an appropriate means of managing built heritage.		Include a description and discussion of relevance of conservation plans in the plan such as for consent conditions. (e.g., Wellington City District Plan).
16 Nelson has no listed character areas. Character areas are defined by the Wellington City Council <i>"as a concentration of common, consistent natural and physical features and characteristics that collectively combine to establish the local distinctiveness and identity of an area, and that contribute to a unique 'sense of place' when viewed by the public at large from the street or other public spaces. These contributory features and characteristics include those in both public and private domains, and are typically comprised of a combination of the following:</i> <i>Streetscape level development form contributed to by topography, street pattern, public open space, street trees, land use, lot size and</i>		A full, professional, and expert assessment of the location and extent of character areas should be actioned with the results modifying the implementation of the intensification proposals. There will be a consequent need to provide for character areas in the plan and appropriate design guidelines. (e.g., Wellington City District Plan). The character area review should be carried out by competent experts in the field such as conservation architects with urban designers.

Issue	Support/oppose	Outcome requested
<i>dimension, garage type and location, and the presence (or otherwise) of retaining walls.</i> <i>Site specific built form contributed to by building age, architectural style, primary building type and materials, building siting and boundary setbacks, building height and shape, and site coverage</i>¹⁰ This can be compared to an historic area which is assessed in the same manner and using the same values as built heritage.		
17 The current rules have not prevented the demolition or unsympathetic alterations of a significant number of heritage buildings over the last 10 years, see appendix 2 below. In many instances, an understanding of heritage values and significance has been lacking in the Council assessments. Many councils employ heritage experts either in-house or as consultants to assess resource consents relating to heritage buildings, rather than relying on planners without this experience or knowledge. Refer appendix 2.		The council should appoint a suitably qualified and experienced conservation architect to review all consents (e.g., Wellington City Council, Waitaki, South Wairarapa). Demonstrably planners do not have the requisite skills and knowledge to undertake assessments of resource consents for heritage buildings and areas.
18 The following changes to the proposed rules ICr.37, ICr 56, REr.85-89 and REr.91, 92 are proposed.		
ICr.37A. The height limit of 25 m is appropriate to only some areas of the inner city. 15 m is a more appropriate height limit to manage adverse effects of high buildings in the inner city heritage precinct, areas of Trafalgar Street, Hardy Street and Bridge Street.	Oppose in part	There should be a controlled activity status with a height limit of 15m for buildings in the Trafalgar, Bridge and Hardy Street heritage precinct areas with areas of control relating to design and effects on historic heritage. Retain clause (v) which considers the effects on adjacent heritage places. Add to" b. and intervisibility between related built heritage items" to ICr37A.4 Add "g. effects on the heritage values of the inner city" to ICr37A.4:
ICr.37B.3 and ICr.37B.4 d. The restricted discretionary matters are too narrow as they do not consider the effects on the heritage values of the wider inner city.		Modifications should avoid all elevations visible from the road or other public locations. Add "iv. effects on the heritage values of the inner city including Trafalgar, Hardy, and Bridge Streets "to ICr37A.4:

¹⁰ Refer <https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/reports/supplementary-documents/pre-1930s-character-areas-in-wellington-city.pdf>

Issue	Support/oppose	Outcome requested
ICr.56.5	Oppose	Retain operative plan rule relating to the Church Hill/Trafalgar Street viewshaft.
REr85.3	Oppose in part	Include reference to the City Centre Heritage Precinct.
REr85.1	Support	
REr85.2	Oppose in part	Seismic strengthening should not impact currently listed interiors or any additional interiors listed as per 20 below. Delete d.ii. There are no lightweight materials that have a similar appearance or the character of concrete or ceramic masonry tile roofing. A typical alternative to concrete or ceramic roofing tiles is painted, pressed, aluminium or steel sheet roofing tiles. These do not have a similar appearance to the authentic tile and will diminish the heritage values and significance of the heritage item. Similarly, replacement of slate roofing with rubber tiles does not have the same appearance as genuine slate.
REr85.3	Support	
REr.85.4	Oppose in part	New a.” the sustainable addition avoids permanent negative impacts on significance” . Renumber a to e. Revise original c. to ”methods of attachment are appropriate, avoid permanent impacts to heritage fabric and are reversible”. New d. viii “Ensure the panels blend into the heritage item through colour matching and minimise reflectivity.” New d. ix. “Where possible site on outbuildings or non-historic buildings on site or non-original additions.” The views of Heritage NZ should be obtained for all consents until a suitably qualified and experienced conservation architect is appointed to council.
REr85.5	Oppose in part	Revise e. to “whether the proposed alterations or additions avoid or minimise changes to any primary elevations and those that are visible from the road or other public locations.”
REr.85.45 a	Oppose in part	Change significance to values and add overall significance.
REr.85.45 o	Oppose	Remove deletion of Wakefield Quay design guide.

Issue	Support/oppose	Outcome requested
REr.86.3	Oppose in part	Any new building on the site of a heritage item should not impact heritage values and significance, should not dominate, should not prevent visibility of the item from the road or other public place and not prevent intervisibility with other related places. A new building may not be appropriate. The views of Heritage NZ should be obtained for all consents until a suitably qualified and experienced conservation architect is appointed to council.
REr.87.3	Support	
REr.89.1	Oppose in part	Revise according to updated interiors list, see 20 below.
REr.89.2	Oppose in part	New heritage areas defined in 1 above and appendix 5 should be added to the list. Note c. i. buy instead of by.
REr. 89.4	Oppose in part	New heritage areas defined in 1 above and appendix 5 should be added to the list. Matters of discretion should be assessed against impact on heritage values and significance of the individual building and group. The views of Heritage NZ should be obtained for all consents until a suitably qualified and experienced conservation architect is appointed to council.
REr.90	Oppose in part	New heritage areas defined in 1 above and appendix 5 should be added to the list. The views of Heritage NZ should be obtained for all consents until a suitably qualified and experienced conservation architect is appointed to council.
REr.91.1	Oppose	It doesn't appear that the assessment of the heritage precincts has identified different categories of buildings, i.e. primary, contributory, neutral or intrusive. This should be implemented prior to the plan change. Rules should be added that consider the different levels of contribution to the precinct. The partial or complete demolition of a contributory building in a heritage precinct should be a full discretionary activity. Similarly the modification of a contributory building should be a discretionary restricted activity.

Issue	Support/oppose	Outcome requested
REr.92.1	Oppose in part	The design of fences should follow historic precedence and these often were of a height of 900 mm and of pickets or cast or wrought iron. 1800 mm high fences on street fronts are opposed, therefore delete b.
REr.113	Support	
20 There is no discussion of additional listings of historic interiors of listed buildings.		A review of historic interiors, particularly those that are publicly accessible, for possible inclusion in the listing should be assessed e.g., original shop interiors.
21 The proposed plan change is silent on Māori and archaeological heritage.		Include Māori and archaeological heritage.

Appendix 1

The following is a comparison of the PNRMP, Dr. Ann McEwan's (AM) list, the existing list and my recommended inclusions in the list.

Address	AM's list ^{11 12}	HNZPT	Existing NRMP listing	PNRMP	Ian Bowman Recommendation
Avon Terrace, 20	Yes	Yes	No	Yes	Yes
Beach Road, 2	Yes	No	No	Yes	Yes
Brook Street, 4	Yes	No	No	No	Yes
Brook Street, 32	Yes	No	No	Yes	Yes
Brook Street, 34	Yes	No	No	Yes	Yes
Champion Road, 93	Yes	Yes	No	Yes	Yes
Collingwood Street, 225	Yes	No	No	Yes	Yes
Collingwood Street bridge	Yes	No	No	Yes	Yes
Dakota Street Nelson airport, Hangar 3 - Demolished	-	-	-	-	-
Glen Road, Athol Street, Glenduan	Yes	No	No	No	Yes
Halifax Street, 5	Yes	No	No	No (removed?)	Yes
Haven Road, 111	Yes	No	No	Yes	Yes
Haven Road median (Moller fountain)	Yes	No	No	Yes	Yes
Hounsell Circle, Tahunanui	Yes	No	No	No	Yes
Mount Street, 10	Yes	No	No	Yes	Yes
Motueka Street, 2	Yes	No	No	Yes	Yes
Muritai Street, 66	Yes	No	No	Yes	Yes
Ngatitama Street, 18	No	Yes	No	No	Yes
Parkers Road, 119	Yes	No	No	No	Yes
Rapide Place Nelson airport, Hangar 2	Yes	No	No	Yes	Yes
Roto Street, 53	Yes	No	No	Yes	Yes
Rutherford Street, 246	Yes	No	No	No	Yes
Trafalgar Street, 400	Yes	No	No	Yes	Yes
Tresillian Ave, 19	Yes	No	No	Yes	Yes
Waimea Road, 125	Yes	No	No	Yes	Yes
Waimea Road, 233	Yes	No	No	Yes	Yes
Wakefield Quay, 415	Yes	No	No	No	Yes
Wakapuaka Road, 460, SH6	Yes	No	No	No	Yes
Nile Street, 98	Yes	No	No	Yes	Yes
Tahunanui Drive, 63	Yes	No	No	No	Yes
Ngatitama Street, 33	Yes	No	No	Yes	Yes
Wakapuaka Road, 48	Yes	No	No	No	Yes

¹¹ NRMP Plan Change 29 – Heritage buildings, places and objects assessments, Dr A McEwan

¹² NCC RMP Review – draft heritage schedule, October 2020

Appendix 2

List of heritage buildings demolished since 2010.

Address	Comment
Bridge Street, 105-105B	
Collingwood Street, 90	
Collingwood Street, 105	
Collingwood Street, 131	
Dakota Street hangar Nelson airport hangar no 3	
Domett St, 42	
Hardy St, 365	
Hardy Street, Griffin's biscuit factory	
Haven Road, 81	
St Vincent Street, Kirkpatrick's factory	
Trafalgar Street, 191	
Trafalgar Street, 207	
Waimea Road, 98	
Waimea Road, 125	
Wakefield Quay, 355	
Wakefield Quay, 357	
Wakefield Quay, 391	

Appendix 3

Inaccurate or missing historical information in Heritage buildings, places and objects assessments, Dr A McEwan:

- 68 Britannia Heights, A W Bowman did not speculatively build adjacent houses – they were all commissioned by individual clients.
- A W Bowman was awarded an NZIA enduring architecture award for Nelson Airport.
- Woodstock, p 204 Beatson did not design the house, he was not practising as an architect at that time and did not construct any buildings using cob. His surviving library, which I have, contains no reference books on constructing buildings in earth nor are there any references in his diaries of constructing buildings in earth. There is no reference to Bowman, I A, *William Beatson A Colonial Architect*, 2004 – this would have cleared up this inaccuracy.
- Newstead, p475, William Beatson did carry out alterations, refer Bowman, I A, *William Beatson A Colonial Architect*, 2004.
- Sharp/Rout residence, p 819, unlikely to be Beatson, he designed in the Italianate style, refer Bowman, I A, *William Beatson A Colonial Architect*, 2004.
- Christ Church Cathedral, p 89, HNZPT heritage area listed.
- Several web references could not be found.

APPENDIX 4

John Wilson, *Thematic Historic Overview of Nelson City*, October 2011

<http://www.nelsoncitycouncil.co.nz/assets/About-nelson/downloads/1176312-thematic-historical-overview-of-nelson-city-OCT2011.pdf>

John Wilson established the following themes and likely examples of each theme:

Theme I	Land The city's site and climate
Theme II	People Population statistics; ethnicity, ages and genders of citizens
Theme III	The city's growth and development The founding of Nelson; settlement history; physical growth, including street patterns; stages of built development; architecture; public open spaces; historic preservation
Theme IV	Living in Nelson Dwellings; social class in Nelson
Theme V	Infrastructure and services Water; sewerage; energy; fire-fighting
Theme VI	Transport and communications Roads; railway; the port; air travel; telegraph and telephone
Theme VII	The economy and livelihoods Farming and horticulture; minerals; industry; commerce and shopping; the professions; Nelson as a holiday destination; crafts and 'alternative' lifestyles
Theme VIII	Government, administration and politics The provincial capital; the city council; the city's boundaries; the central government's presence in Nelson; law and order; Nelson's place in national politics; Nelson as a centre of the conservation movement
Theme IX	Education and intellectual life The Nelson Institute; schools; other educational institutions; the Cawthron Institute
Theme X	Religion Churches and religious life
Theme XI	Social life Clubs, societies, lodges and other social institutions
Theme XII	Culture and entertainment Libraries, theatres, art galleries; radio and television
Theme XIII	Sport Sports as social activities; sportsgrounds
Theme XIV	Health and social services Hospitals; the Plunket Society
Theme XV	Military Presence of the armed services; defensive measures; war memorials
Theme XVI	Nelson's relationship with the rest of New Zealand Early ties with Wellington and Taranaki; the 'secession' of Marlborough; Nelson as a base for the exploration of the South Island; Canterbury and the driving routes

Based on these identified themes, a comparison of items already listed in the NRMP could be made. The numbers of items within each of the general themes was as follows:

Houses pre-war (227)

Houses post war (0)

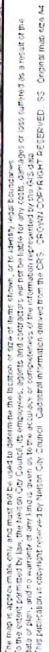
Commercial buildings post war (1)

Industry (2)
Health and social services (3)
Infrastructure and services (3)
Social organisations (3)
Political/government law and order (4)
Military (4)
Cultural institutions (5)
Settlement and provincial period (6)
Hotels (9)
Schools (9)
Transport communications (11)
Open spaces (11)
Churches (15)
Pre-war commercial (50)

Therefore the current list is not representative of key historical themes that define the unique physical, cultural and social history, character and development of Nelson city. To have a more widely spread range of heritage resources reflected in the NRMP, new listings should be more representative of those with no or few examples including:

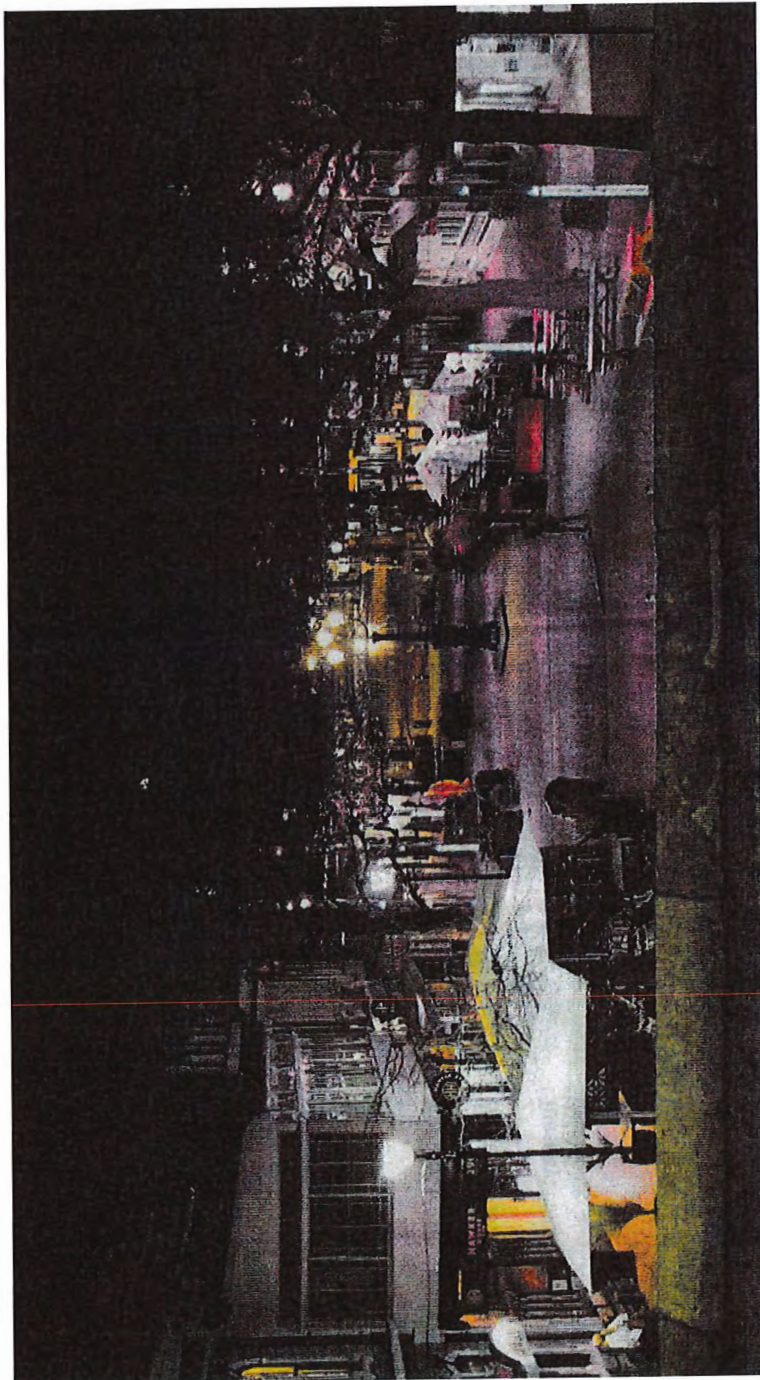
- post war housing
- post war commercial buildings,
- industry,
- health and social services,
- social organisations,
- military,
- schools,
- transport and communications,
- post war churches,
- significant Nelsonians,
- significant architectural styles; and
- ethnic minorities.

Historic precincts previously recommended to the NCC in 2011



APPENDIX 6

Photo of viewshaft Nelson Mail October 6, 2023. A popular view published many times.



Received: 25/10/23
Sub No: 5386
NDACS: 539570224-
16590

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: ERIC RICHARD PETER Address: Telephone: Email: ERJOPETER@GMAIL.COM
--	---

- ☒ 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

21/10/2023
.....
Date

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

Tuesday 19th September

30 OCTOBER

Received: 30/10/23
Submitter: S387

Submission Form for Nelson City Council Notified Plan Change 29

To:

Submitter:

Senior Planning Administrator

David Edwin Bennett

RMA Plan Submissions NCC

P O Box 645

Nelson

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

Plan Change 29

I Oppose the Plan Change; and particularly the following

The plan changes have been brought about by (as I understand) a recognition of the National Policy Statement for Urban Development – which may have been mandatory for Tier 1 cities but only voluntary for Tier 2 cities. While it is understood that consideration needs to be made for future development the “Consultation” process has been reversed – whereby the public should have had input into the design and not the other way around whereby the council has come up with a design which it pushes around with comments that it is “consultation” and you will be able to have your say.

Then Council comes back at the public later and say – you didn’t object or comment at the first stage.

Proposal of Plan Change 29

The Plan Change is out of “context” with the scope and extent of what could be considered a beautiful and functional city.

The proposed relaxations on building heights does not fit with the wishes of the populace.

An example would be the favorable comments and feelings now gained from the examples of the Christchurch re-build where the expressions that the city feels a better space now that the extreme high rise has not been replaced.

The extent that the high density areas have been expanded out from the central city is too large and does not fit with the outcomes residents wish for.

What is wrong with this Plan –

The central business area was disclosed to be up to 6 stories in height – but the mayor was talking about 7 to 8 stories latterly. Even six stories in height is excessive except in a very small area of the central business area.

Mod: 539570244-17065

The allowance of three stories with minimal set-back from boundaries in the high density residential areas is excessive. Also the aspect of the council revising the daylight angles away from the current model – without wide public notification and commentary shows it is not acting in the best interests of the ratepaying public.

Some of the core elements upon which the plan is founded – is that the plan takes its lead from the visions of a walking public that is based around a 15 minute walk from amenities.

One fundamental oversight is that this council has not given forethought to the implications of climate change and rising sea levels especially when central government has given rise to the probability of having a Managed Retreat Policy in regard to infrastructure and improvements.

So the Council is putting itself in a position of having the “cart before the horse” in creating a huge development problem from which it will have to walk away from and set the populace up for huge expense or future losses.

Zoning areas-

The high density residential areas should not be expanded and neither should three story cart blanch development be allowed with the new proposed revised daylight angles.

Solutions to the provisioning of housing and the development of the city -

A higher density build could be established by the lessening of the existing site coverage rules, the allowance for increased numbers of units on sites (sections), limiting the building heights to 2 stories and maintaining the current daylight angle and set-back requirements.

If the central city blocks need to be developed the six stories only in the centre of the two large carpark blocks – with a mix of lower floor carparks with over-head residences.

Around the street frontages around the above – three to four level buildings.

Development outside the ring-road block limited to the current commercial zoning and with the provision of notification and public feed-back.

No three level development in the residential zones – unless it is on large format blocks of land and designed in accordance with the current daylight angles in mind and is open to consultation – open honest and where affected parties have the ability to have input on design before consents are granted.

Fundamental proposals and outlines before large scale and expensive development decisions are allowed for -----

Furthermore the council should address the climate change effects and come up with a plan or at least a proposal to address the projected sea-level rise effects.

Will you have a plan or will you retreat? How is the current infrastructure going to be maintained?

Both sewerage treatment plants are very susceptible to a moderate sea-level rise.

Areas of the existing city are very susceptible to sea and flooding events right now! Gloucester St, Vanguard St, Wakatu Square - even the Trafalgar/ Halifax intersection is vulnerable – if the right (wrong) mix of events occur.

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

Submitter Signature



Date

30/10/2023

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: David Edwin Bennett
Address:

Telephone:
Email: davidandpam.db@gmail.com

Received: 30/10/23
Sub No: 5387
Notes: 539,570 224 -
18089

☒ 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

1. the creation of a High Density Residential Zone (HDZ), that has a max height greater than 12m, as it is not mandated under NPS-UD 2020
2. the loss of the existing protection for sunlight to all properties, because it is a 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 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 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

Please see additional submission from the above

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

Please see additional submission from the above

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

Submitter signature

Date

30/10/2023

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

Online submission

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

Submitter No.	S388
Submitter Name	Gary Calderbank
Submitter first name	Gary
Submitter middle name	Andrew
Submitter surname	Calderbank
Submitter is contact	Yes
Email	gary.calderbank70@gmail.com
Wish to be heard	No
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose		Abandon plan 29 changes and seek better advice on urban growth/densification to suit the specific needs of the Nelson community without allowing developers to destroy its physical and cultural landscape.

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.

1) The Plan Change 29 Process. I wish to declare:

a) That I have found it difficult to digest the total impact 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 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.

f) NCC appears to have failed to take account of the findings of the report commissioned by NCC and TDC in 2021 called Housing We'd Chose by m.e Consulting (Document reference: TDC 002.21 HWC Tasman Nelson) which analyses housing preferences of the population. The report clearly indicates on page 33 that 3 of the top 5 preferences for both Nelson and Tasman urban residents are:

- i) Sunny location
- ii) Freehold title
- iii) Stand-alone dwelling

The current proposal for multi-level, multi occupancy buildings cannot meet any of these requirements.

2) Hearing Panel

I object to the make-up of the hearing panel, which only has representatives who voted against Councillor Courtney's proposal to withdraw PC29 at the 14th September Council meeting. This demonstrates a negative bias towards the review of information which will be submitted by the public.

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

3) NCC's Population forecasts

These are crucial in determining the scale at which Nelson needs to enable intensification and growth. The forecasts used by NCC are not Statistics NZ medium projections but are over inflated and do not accurately reflect the data provided by NZ's statistical authority. The Statistics New Zealand, Subnational Population Estimates 30 June 1996 – 2020 are supplied on p16 of the Housing We'd Chose by m.e Consulting report commissioned by NCC in 2021.

- i) I ask the Council to use projection forecasts provided by the National Statistics body as recommended by the NPSUD Capacity 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 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

Sunlight entering and being harnessed in the home is essential for healthy and sustainable design, 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/> . There are other factors

to consider within the application of PC29,

a) Existing houses built prior to and under the current daylight admission rules may be subjected to the loss of sunlight amenity under PC29 with the following effects: -

- i) Increased levels of mental health illness, anxiety and stress.
- ii) Increased levels of damp homes with associated mould and mildew and respiratory illnesses.
- iii) Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.
- iv) Reduction in property values and increased financial stress, due to the house being less desirable to live in.
- v) Residents, struggling with the cost-of-living crisis may not afford to heat their home.
- vi) Property owners may 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 affected neighbours give 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 affected 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.

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'.
- iii) Repurpose the existing under occupied inner-city buildings into upper-level accommodation with retail/office space underneath
- iv) Consider adding accommodation options above the existing large retail complexes such as Whakatu Car Park, Montgomery Square and Vanguard/St Vincent St Rebel Sports/Briscoes.

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) Incentivise rate paying residents to demolish or relocate their house in favour of placing more units on the same section providing they comply with the suitable character or heritage of the neighbourhood.

ii) Incentivise existing residential owners to infill in a sympathetic manner on existing larger sections, by removing the development levies and additional rate charges.

9) On-street carparking

a) Increased intensification will result in more on-street car parking and the narrow streets of Nelson will become a hazard to pedestrians, mobility scooters, cyclists, refuse collection and Emergency Service vehicles. This will cause fracturing of neighbourly relations and communities.

i) I ask Council to provide a 'Comprehensive car parking management plan' as strongly encouraged by Policy 11 of the NPSUD 2020, to mitigate against these issues.

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

iii) I encourage the inclusion of ground floor parking underneath new CBD developments to mitigate some of the impact of intensification.

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.

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) Many of the recommendations above could provide options for social housing without negatively impacting on existing residents.

11) Infrastructure

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

In summary, I do not believe that PC29 is a fair or workable solution to our current housing issues in the area. It has the potential of creating environmental detriments to existing residential dwellings and lacks a transparent control mechanism to create the housing needs of the future (i.e affordable, sustainable housing vs wealthy / holiday homes). It appears to be developer focussed than than community focussed and removing the current individual resource and planning consent processes that protect the greater community is a dangerous precedent to set. I firmly believe that the RC and BC processes can be streamlined to allow houses to be built quicker and at a lower cost to the end user but the broad brush PC29 is not the solution and should be scrapped.

Documents included with Submission

Document name: Plan change 29 submission Gary

File: planchange29submission36ga

Description: Letter to NCC re opposition to plan change 29

Online submission

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

Submitter No.	S389
Submitter Name	Elizabeth Dooley
Submitter first name	Elizabeth
Submitter middle name	Ann
Submitter surname	Dooley
Submitter is contact	Yes
Email	elizdooley@hotmail.com
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General support	Oppose in part	This would give disabled, children, elderly, everyone a chance to relax in a pollution free zone, shopping, dining communicating with each other face to face.	Regarding the City Centre as explained in your plan, could this area be made free of traffic other than necessary restocking deliveries. These deliveries to be made by electric vehicle.
Suburban Commercial Zone	Suburban Commercial Zone	Oppose in part	Removal of petrol tanks, etc, would remove a hazard. The freed up space would make excellent apartment blocks, medical centres, indoor recreational facilities, disability clinics and centres. (bearing in mind the importance of total access to and in these places.	Please consider moving car yards and any garages to the suburban commercial zone. They are not relaxing, inner city activities.

Entire Plan Change	General support	Oppose in part	to enable maximum sunlight (as opposed to daylight) to be enjoyed by people who's properties join these buildings on this side. To show consideration to neighbours in this situation. We need an attractive city that attracts tourism and residents, and if it is badly planned, we will fade away as an attractive venue.	(a) Please ensure that the new buildings are located in the South side of their building site (b) please ensure all apartment buildings have a green area and a play area - hopefully this space could be shared by different apartment blocks accessing this area (c) without an overall plan, the city centre and adjoining residential areas will be developed by developers who have no interest in Nelson City itself, so it is imperative that nothing is started until we have a street plan laid out.
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Documents included with submission

None

Online submission

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

Submitter No.	S390
Submitter Name	Thomas Currie
Submitter first name	Thomas
Submitter middle name	Edward
Submitter surname	Currie
Submitter is contact	Yes
Email	tomcurrie37@gmail.com
Wish to be heard	No
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Residential Zones	High Density Residential Zone	Oppose	I am concerned that the high density buildings will impact sunlight, privacy, garden productivity and solar panel production. Nelson has a small area of older character houses and this has the potential to damage the aesthetics of the area. I would like to see intensification in the CBD where other residential properties are less likely to be affected.	I am opposed to the proposed high density zone. The central residential area should be preserved with character which this will damage. I am opposed to the removal of provisions that allow for non-notification. I think select areas and in particular parts of CBD should have higher density buildings and apartments.

Documents included with submission

None

Online submission

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

Submitter No.	S391
Submitter Name	Thomas Croker
Submitter first name	Thomas
Submitter middle name	Campbell
Submitter surname	Croker
Submitter is contact	Yes
Email	tom@tmltd.co.nz
Wish to be heard	No
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Residential Zones	Medium Density Residential Zone	Oppose in part		I oppose both the housing density (3 units per site) and seek that this is reduced to 2 units. I also oppose the height restriction of 12m (3 storeys) and propose this is reduced to 8m (2 storeys)
Residential Zones	General Residential Zone	Oppose in part		I oppose both the housing density (3 units per site) and seek that this is reduced to 2 units.

Documents included with submission

None

Received: 25/10/23

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

Sub No: S392

NDOCS: 539570224-16592

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: Full Name: JOHANNA MAGDOLENA PETER Address: Telephone: Email: EA.JOEPETER@XTRA.CO.NZ
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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

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

... 21/10/2023
Date

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

Tuesday 19th September

30 OCTOBER 2023

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

Received 25/10/2023

Sub No: S393

NDOCS: 539570224-16594

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: Full Name: <i>Paul Fox</i> Address: Telephone: Email: <i>paulrichardfox@hotmail.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

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

This Proposal is theft - Daylight theft and should not be allowed next to or close to existing single storey structures.

Yes build 2-3 storey units in areas, where single storey dwellings and their owners are not affected.

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

Paul Fox
.....

Submitter

19-10-23
.....

Date

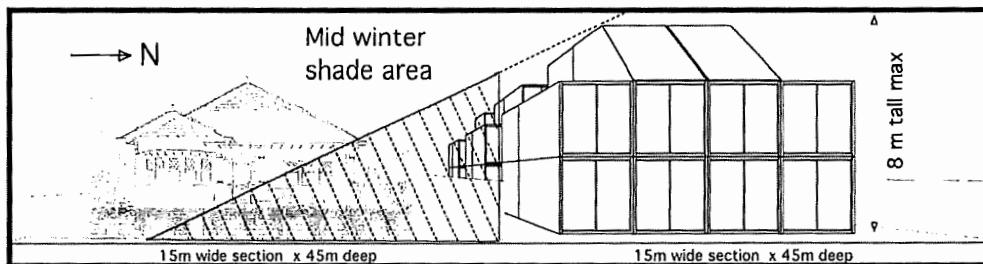
NB: TO BE DELIVERED TO NCC OR SENT TO environmental.planning@ncc.govt.nz by 4.00 pm

Tuesday 19th September

NELSON'S "your sunlight" DAYLIGHT ROBBERY!

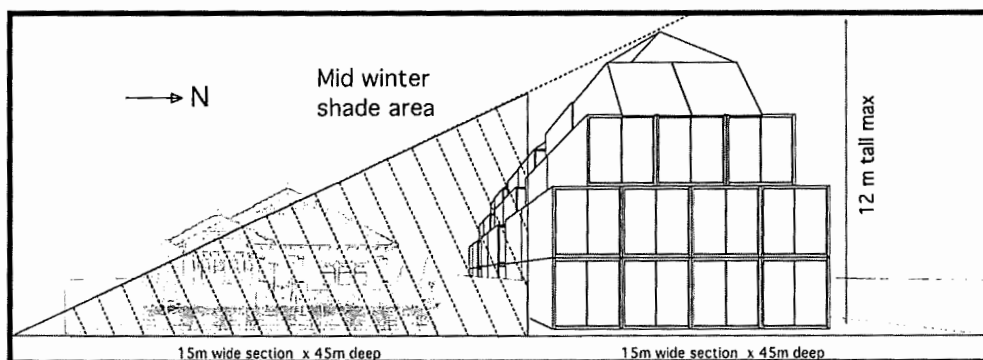
Nelson City Council is planning drastic changes to Nelson's urban environment, giving developers "As Of Right" to build 3 types of mass infill - no input by you!

General Residential Zone - GRZ



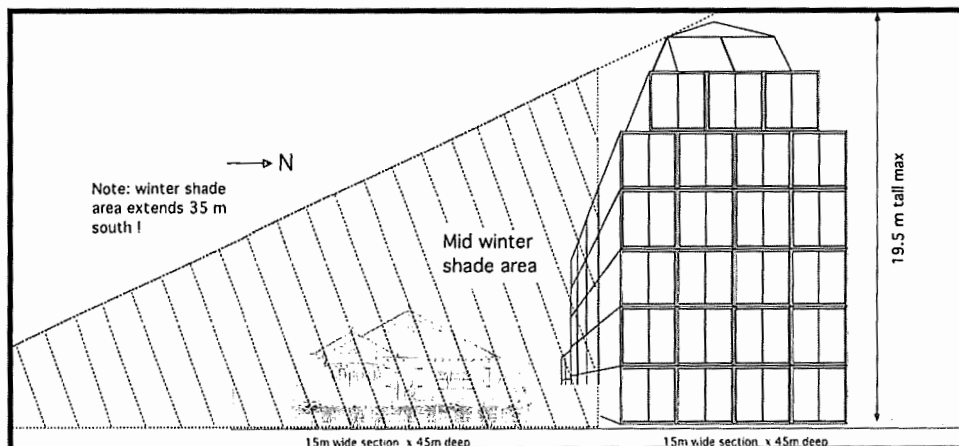
Three x's 2 story houses - 2+ units per building up to 550 sq m of habitable space. Can be just 1 m from lot line - 8 m tall. ~ 45 - 20' containers stacked up on your boundary without ANY say from you!! **NO PARKING REQUIRED**

Medium Density Zone - MDZ



Three x's 3 story houses - 3+ units per building up to 1000 sq m of habitable space. Can be just 1 m from lot line - 12 m tall. ~ 65 - 20' containers stacked up on your boundary without ANY say from you!! **NO PARKING REQUIRED**

High Density Zone - HDZ



Apartment complex - up to 45 units in the building up to 2000 sq m of habitable space - can be just 1 m from lot line - 19.5 m tall approx. ~ 120 - 20' containers stacked up on your boundary !!

**NELSON
NEEDS
YOU TO
HAVE
YOUR SAY !**

Check YOUR
Re-Zoning at
*Shape Nelson
-ePlan*

*"MAKE YOUR
VOICE HEARD"*

Submissions

close on Oct. 31st

FaceBook
Stop Plan
29

Email
stopplan29@gmail.com

- NO PARKING REQUIRED

25 October 2023

Received: 25/10/2023
Sub No: S394
NDOCS: 539570224-16597

Nelson City Council
Civic House
110 Trafalgar Square
NELSON

Sent by email: environmental.planning@ncc.govt.nz

To Whom It May Concern

Re: Plan Change 29: Offsite manufactured New Builds deemed as Relocatable

We have been made aware that the Nelson City Council (NCC) current Relocated Dwelling rules do not differentiate between delivery of new builds and relocated established dwellings. Therefore there is some confusion regarding the need for resource consent as an offsite manufactured new build is assessed in a similar way to an "old" repurposed dwelling that requires significant renovations to ensure it is habitable and blends into the surroundings. Offsite manufactured buildings should be assessed in the same manner as a new build built onsite in a traditional way.

It is recommended that the NCC clarify the definition of a relocated dwelling to specifically limit it to a re-used building and explicitly exclude new offsite manufactured dwellings from its Relocated Dwelling definition and examples.

The offsite sector is striving to improve the way New Zealand builds and helps to improve productivity & quality and reduce waste. Wider policy settings are supporting the adoption of offsite solutions including the Building Amendment Act 2021, Building for Climate Change and the Commerce Commissions recommendation for an all-of-government strategy to support the offsite manufacturing sector.

Councils play an important role in encouraging the use of offsite manufactured solutions to help improve the build environment so it is recommended that the Council ensure that the pathways for approving such solutions are clear and concise.

There is no trade competition gain through this submission.

Yours sincerely



Scott Fisher, CEO

SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

Received: 26/10/2023
 Sub No: S395
 NDOCs:539570224-16604

To: Senior Planning Administrator RMA Plan Submissions Nelson City Council PO Box 645 Nelson 7040	Submitter: Full Name: <i>ANDREW SULLIVAN</i> Address: Telephone: Email: <i>agbsullivan@hotmail.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

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

*I oppose any building of 3 stories or more outside of Nelson CBD (Trafalgar, Halifax, Collingwood, Selwyn St boundaries) utilisation of land inside this area should be prioritised over any suburban areas.
 Sunlight is not the same as daylight. I live in Nelson because of its high sunSHINE hours. This should be protected for all rate payers!*

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

A co-ordinated plan involving an official planning committee, made up of residents, a council to plan for future growth in a co-ordinated manner. Not leaving decisions on Nelson's future to developers! individual land owners.

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

AGBSullivan

Submitter

25/10/2023

 Date

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

Tuesday 19th September

Online submission

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

Submitter No.	S396
Submitter Name	Arnold Ayre
Submitter first name	Arnold
Submitter middle name	Benedict
Submitter surname	Ayre
Submitter is contact	Yes
Email	b.ayre@outlook.com
Wish to be heard	Yes
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
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Entire Plan Change	General opposition	Oppose	Nelson city has been identified by many of its citizens, often after travelling to many places both in New Zealand and overseas, as offering the best environment for them to settle. It offers a special blend of city and outdoor living, is known for its arts and crafts, its access to mountains and sea, and its friendly outdoor living style. Heritage is about more than just a handful of nominated streets and buildings. It is about what makes the city as a whole special, and what is passed from previous generations to future generations; from previous city councils, to future city councils. I suggest that the proposed Plan 29 change is likely to irreparably break the link in our heritage.	Reject the plan change in its current form which I understand is only mandated for Tier 1 cities. Put more resources and effort into analyzing the demographic of our current and future housing needs (eg lack of a Night Shelter). Maintain control of the development of our city with an ongoing case by case Resource Consent approach that reflects, preserves, and enhances the character of each individual urban environment thus ensuring Nelson's heritage is preserved. I support the council adopting a Resource Management Plan that caters for our present and future housing needs, also taking into account the likely effects climate change will have on both current and proposed housing developments. I acknowledge that intensification in some areas will be needed to meet these needs. I do not support a plan that devolves responsibility for our residential cityscape to commercial development. I do not support the division of our residential zoning into large chunks that allow, to different degrees, intensive development regardless of detrimental effect on cityscape and neighboring properties. I suggest there are opportunities for intensification without detrimental effects, such as multistory housing against hillsides, multiple dwellings on single sites, and larger developments where the developer has obtained multiple sites. In each case the proposed development should be reviewed with regard to the heritage of the area and effect on immediate neighbors including no change to daylight angle requirements.
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Residential Zones	High Density Residential Zone	Oppose	We live in a proposed High Density Residential Zone. Our lifestyle is based around the our garden as a place of recreation, beauty, and food production. This would be destroyed if we were hemmed in by multi-storey developments on our east and/or north boundaries. (Currently an out of town developer owns land on both.) We have also installed solar panels which have the potential to become compromised. We have lived in this environment for over 35 years; have invested our savings into our property and lifestyle rather than taking overseas trips, buying expensive vehicles etc. This lifestyle has the potential to be destroyed by the proposed plan change, as, I suggest, is the lifestyle of many other Nelsonians. It is possible to locate multi-storey apartment buildings where it does not have this detrimental effect on neighbors, for example the apartment blocks that have been built on the hillside around Haven and Rocks Roads.	The loss of protection of sunlight angles into our houses and gardens
Residential Zones	High Density Residential Zone	Amend	We live in and area where parking is already at a premium and close to a primary school. Safety, and convenience for the current residents need to be considered when large new developments are proposed.	Provision for parking to be part of resource consent decisions. This now not required by law, but if resource consent remained on a case by case basis it could be factored into decisions regarding supporting infrastructure.

Online submission

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

Submitter No.	S397
Submitter Name	Ali Lawley
Submitter first name	Ali
Submitter surname	Lawley
Submitter is contact	Yes
Email	alawley@proton.me
Wish to be heard	No
Joint presentation	Yes
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General opposition	Oppose		Full withdrawal of the proposed plan. Community engagement to create a new one.

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.

1) The Plan Change 29 Process. I wish to declare:

a) That I have found it difficult to digest the total impact 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 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.

f) NCC appears to have failed to take account of the findings of the report commissioned by NCC and TDC in 2021 called Housing We'd Chose by m.e Consulting (Document reference: TDC 002.21 HWC Tasman Nelson) which analyses housing preferences of the population. The report clearly indicates on page 33 that 3 of the top 5 preferences for both Nelson and Tasman urban residents are:

i) Sunny location

ii) Freehold title

iii) Stand-alone dwelling

The current proposal for multi-level, multi

occupancy buildings cannot meet any of these requirements.

2) Hearing Panel

I object to the make-up of the hearing panel, which only has representatives who voted against Councillor Courtney's proposal to withdraw PC29 at the 14th September Council meeting. This demonstrates a negative bias towards the review of information which will be submitted by the public.

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

3) NCC's Population forecasts

These are crucial in determining the scale at which Nelson needs to enable intensification and growth. The forecasts used by NCC are not Statistics NZ medium projections but are over inflated and do not accurately reflect the data provided by NZ's statistical authority. The Statistics New Zealand, Subnational Population Estimates 30 June 1996 – 2020 are supplied on p16 of the Housing We'd Chose by m.e Consulting report commissioned by NCC in 2021.

i) I ask the Council to use projection forecasts provided by the National Statistics body as recommended by the NPSUD Capacity 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) Reduction in property values and increased financial stress, because the house would be less desirable to live in.

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

vi) 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 affected neighbours give 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 affected 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.

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'.

iii) Repurpose the existing under occupied inner-city buildings into upper-level accommodation with retail/office space underneath

Consider adding accommodation options above the existing large retail complexes such as Whakatu Car Park, Montgomery Square and Vanguard/St Vincent St Rebel Sports/Briscoes.

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) Incentivise rate paying residents to demolish or relocate their house in favour of placing more units on the same section providing they comply with the suitable character or heritage of the neighbourhood.

ii) Incentivise existing residential owners to infill in a sympathetic manner on existing larger sections, by removing the development levies and additional rates charges.

9) On-street carparking

a) Increased intensification will result in more on-street car parking and the narrow streets of Nelson will become a hazard to pedestrians, mobility scooters, cyclists, refuse collection and Emergency Service vehicles.

This will cause fracturing of neighbourly relations and communities.

- i) I ask Council to provide a 'Comprehensive car parking management plan' as strongly encouraged by Policy 11 of the NPSUD 2020, to mitigate against these issues.
- ii) I ask Council to use traffic calming solutions that do not lose on-street car parking spaces. Eg. Speed Humps, instead of Choke Points.
- iii) I encourage the inclusion of ground floor parking underneath new CBD developments to mitigate some of the impact of intensification.

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.
- 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) Many of the recommendations above could provide options for social housing without negatively impacting on existing residents.

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.



HERITAGE NEW ZEALAND
POUHERE TAONGA

Tairangahia a tua whakarere;
Tatakihia nga reanga o amuri ake nei
Honouring the past; Inspiring the future

26 October 2023

File ref: 33002-090

Nelson City Council Planning Team
PO Box 645
Nelson 7040
New Zealand

environmental.planning@ncc.govt.nz

Tēnā koe,

**SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON NELSON CITY PROPOSED PLAN
CHANGE 29**

To: Nelson City Council

Name of submitter: Heritage New Zealand Pouhere Taonga (HNZPT)

1. Heritage New Zealand Pouhere Taonga is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historic heritage.
2. This is a submission on Nelson City Proposed Plan Change 29 (PC29).
3. HNZPT could not gain an advantage in trade competition through this submission.
4. The specific provisions of PC29 that the HNZPT submission relates to are detailed in the attached table (Attachment 1).
5. The majority of the HNZPT submission points relates to the proposed changes to historic heritage provisions as part of the proposed changes to introduce more flexibility around housing policies and rules. The management of the Nelson urban area's finite heritage resources is especially important for enabling existing and to enhance the value that the district's residents gain from

living and working in and around historic places. The HNZPT submission points which relate to the Inner City Heritage Precinct align with the recommendation from Dr Ann McEwan that there should be *rules that seek to maintain and enhance the heritage values and historic character qualities of the central business district, including but not limited to upper Trafalgar Street*. (Section 32 Appendix 3K).

6. The reasons for the HNZPT submission are detailed in Attachment 1.
7. HNZPT seeks the decisions as described in Attachment 1.
8. Heritage New Zealand Pouhere Taonga **does wish to be heard** in support of our submission.
9. If others make a similar submission, HNZPT will consider presenting a joint case with them at a hearing.

Ngā mihi



Jamie Jacobs
Kaiwhakahaere Matua / Director Takiwā o Te Pūtahi a Māui /Central Region
Heritage New Zealand Pouhere Taonga

Attachment 1:

Heritage New Zealand Pouhere Taonga Submission Table on Nelson City Proposed Plan Change 29

Address for service

Heritage New Zealand Pouhere Taonga
Takiwā o Te Pūtahi a Māui
PO Box 2629
Wellington 6140
Ph: 04 494 8325

Contact person: Dean Raymond, Kaiwhakahaere ā Takiwā
Email: draymond@heritage.org.nz

Attachment 1 Submission of Heritage New Zealand Pouhere Taonga on Nelson City Proposed Plan Change 29				
Point	Proposed Plan Provision	Support/ Oppose	Reasons for Submission	Relief sought Strike: ~~abc~~ = delete Underline: <u>abc</u> = addition
Chapter 2 – Meanings of Words (Definitions)				
	Sustainable additions	S	Heritage New Zealand Pouhere Taonga supports the new definition of ‘sustainable additions’	Retain this definition.
	Heritage Precinct	S	HNZPT supports the new definition of ‘heritage precinct’.	Retain this definition.
	Seismic Strengthening	S	HNZPT supports the new definition of ‘seismic strengthening.’	Retain this definition.
Chapter 5 – District Wide Objectives and Policies				
	DO4.1.13 Heritage Precincts	S	HNZPT supports this policy referring to heritage precincts	Retain provision
	Policy DO4.1.13.i Heritage Precincts Explanation – list of precincts	S	HNZPT supports the retention of Albion Square as a heritage precinct. This place is included as an Historic Area on the New Zealand Heritage List / Rārangī Kōrero and has high heritage values which meet the criteria for a heritage precinct. It is noted that Richmond Avenue has been added to the list of precincts. HNZPT supports the addition of the Richmond Avenue Precinct.	Retain Albion Square heritage precinct. Retain Richmond Avenue heritage precinct

Policy DO4.1.13.i Heritage Precincts Explanation – list of precincts – Inner City Precinct	O	It is noted that the Central City precincts (Trafalgar, Bridge, and Hardy streets) have been removed. HNZPT opposes the deletion of the Inner City Heritage Precinct. It is noted that Council's Heritage consultant Dr Ann McEwan has made the comment that <i>there is now considerable risk posed, by way of future developments and intensification, to the integrity of the surroundings of scheduled heritage items and to historic character buildings in the central city.</i> (Section 32 Appendix 3K, page 2) Dr McEwan recommends the development of a suite of <i>planning policies and rules that seek to maintain and enhance the heritage values and historic character qualities of the central business district, including but not limited to upper Trafalgar Street.</i> (ibid p.11)	Amend the explanation in DO4.1.13.i to refer to a further inner city heritage precinct: In the Inner City Zone, ~~two~~ <u>three</u> heritage precincts are present: <u>Trafalgar/Bridge/Hardy Streets</u>, South Street and Albion Square.
Chapter 7 Residential Zone			
REd – Description – REd.3	S	HNZPT supports the description, which includes reference to the historic settlement patterns and heritage areas of Nelson.	Retain provision
Objective RE1.1 Densities	S	HNZPT supports this objective to provide for a range of densities in Nelson	Retain provision
Policy RE1.2 – flexibility in development	S	HNZPT supports this policy to allow for flexibility in density and building form	Retain provision
Residential Zone Policies related to historic heritage	S	In the Draft version of Plan Change 29 the following clause was included in the General Residential Zone Policies relating to historic heritage: <i>Require development adjoining heritage precincts or scheduled buildings to maintain or enhance the heritage</i>	Include the following policy in Chapter 7 – objectives and policies: <u>Require development adjoining heritage</u>

			<i>values of the place, having regard to the scale, form and layout of the development.</i> This policy (or equivalent) is absent in the notified version of Proposed Plan Change 29. HNZPT recommends that this policy is retained, so that rules pertaining to development adjoining heritage sites are supported by a relevant related policy.	<u>precincts or scheduled buildings to maintain or enhance the heritage values of the place,</u> <u>having regard to the scale, form and layout of the development.</u>
	RER18T	S	The rules for buildings adjoining historic heritage precincts and sites are supported by HNZPT.	Retain provisions.
	RER.19T	S	The rules for over-height developments adjoining historic heritage sites are supported by HNZPT.	Retain provisions
Chapter 8 Inner City Zone Objectives and Policies				
	Objectives allowing for greater intensification	S	HNZPT in general is supportive of the objectives for intensification in the inner city area, provided that historic heritage values are appropriately recognised and provided for.	Retain provisions.
	ICD.9 The description of the Inner City Zone includes recognition of heritage values	S	HNZPT supports the description including reference to the heritage and architectural significance of many of the inner city buildings.	Retain provision
	IC 2.3 Quality of the Public Realm	S	Clause (h) includes recognition of the historic heritage values of the inner city area	Retain provision.
	IC2.4 Views	O	HNZPT opposes the deletion of this policy statement regarding the importance of views and the landscape setting of Nelson, including the views towards Church Hill.	Retain this section and do not delete as proposed in PC29.

			The growth of trees on Trafalgar Street is not a good reason for deleting the viewshaft provisions.	
IC3 Site Amenity	S		HNZPT supports Objective IC3 which requires site development to be sympathetic to the <i>character of the heritage buildings in the inner city</i>	Retain this Objective
IC3.1 'street wall'	O (partial)		This Policy should be amended to recognise the heritage values of the inner city and their contribution to the streetscape of Trafalgar, Hardy and Bridge Streets. This is reflected in the exemptions, however there should be a positive requirement to recognise this in order to achieve Objective IC3. As such, a clause recognising the heritage values of the inner city, with particular reference to these streets, needs to be included in IC3.1 This recognition needs to be broader than the individually scheduled buildings, and needs to refer to the heritage values of the wider inner city area.	Add the following clause to Policy IC3.2: <u>(d) recognise the heritage values of the inner city and the contribution heritage buildings make to the character of the city.</u>
Inner City – additional policies relating to Inner City Heritage Precinct	O		In order to recognise the importance of historic heritage in the inner city and give effect to the recommendation made by Dr McEwan in the section 32 Report¹, HNZPT recommends adding an additional policy to: • provide for the maintaining and enhancement of the heritage values of the precinct; • recognise that within a heritage precinct, there are contributing and non-contributing buildings; and	Insert the following policy provisions relating to Inner City Heritage Precinct: <u>Ensure that new buildings or additions and alterations to</u>

¹ a suite of planning policies and rules that seek to maintain and enhance the heritage values and historic character qualities of the central business district, including but not limited to upper Trafalgar Street. (Appendix 3K).

		provide an appropriate consenting pathway for more intensive development. All buildings currently included in the Nelson Resource Management Plan heritage schedule should be recognised as contributing buildings. Other recently developed district plans contain relevant and informative provisions relating to inner city heritage areas. The New Plymouth Proposed District Plan (Decisions version) includes a heritage character area in the inner city of New Plymouth. The policy and rule framework adopted by New Plymouth forms a useful precedent for adaptation in the Nelson context. The Wellington Proposed District Plan also has well-considered provisions for heritage areas, covering places such as Cuba Street.	<u>contributory buildings within the Inner City Heritage Precinct are appropriately located and that the overall bulk, form, scale, composition and design of the structure is appropriate, having regard to:</u> <u>compatibility with the form, proportions, materials and setting of existing buildings or items within the heritage precinct;</u> <u>continuity or coherence of the identified special character values, streetscape qualities and geographical features of the area;</u> <u>the impact on the heritage and cultural values of the area and the relationship of</u>
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				<u>the new building,</u> <u>alteration or</u> <u>addition with its</u> <u>setting which</u> <u>contributes to, or</u> <u>is associated</u> <u>with, the heritage</u> <u>and cultural</u> <u>values of the</u> <u>area;</u> 4. <u>whether the</u> <u>addition or</u> <u>alteration</u> <u>contributes to the</u> <u>long-term</u> <u>viability,</u> <u>retention or</u> <u>ongoing</u> <u>functional use of</u> <u>the building or</u> <u>item; and</u> 5. <u>whether the</u> <u>addition or</u> <u>alteration</u> <u>enhances the</u> <u>building or item</u> <u>by returning it to</u> <u>its original form</u> 6. <u>any cumulative</u> <u>effects on the</u> <u>heritage values of</u> <u>the precinct.</u>
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Chapter 8 - Inner City Zone Rules					
ICr37A	O (partial)	The height limit of 25m in the inner city area is appropriate for some parts of the inner city. However, a permitted height standard of 15m is appropriate to manage the adverse effects of high buildings in the inner city heritage precinct of Trafalgar Street, Hardy Street and Bridge Street. Any proposed building higher than 15m needs to be regulated through the consenting process in order to assess any adverse effects that may arise on historic heritage values due to the increased building heights. The clause which considers the <i>effects on the heritage values of adjacent heritage precinct or scheduled buildings</i> is supported. The assessment criteria also needs to include specific reference to the heritage values of the inner city area.	Include a 'carve out' provision with a permitted activity height limit of 15m for buildings in the Trafalgar, Bridge and Hardy Street heritage precinct areas. Retain clause (v) which considers the effects on adjacent heritage places. Add the following clause to ICr37A.4: <u>Effects on the heritage values of the inner city</u>		
ICr37B.3	O (partial)	The restricted discretionary matters listed in this rule should include a matter considering the effects on the heritage values of the wider inner city area. This would enable consideration to go beyond the potential effects on individually scheduled buildings, and would allow for a broader consideration of effects on the heritage of the inner city. The provisions related to assessing the effects of development on adjacent heritage buildings is supported by HNZPT.	Add the following clause to ICr37B.3: <u>Effects on the heritage values of the inner city and the contribution heritage buildings make to the character of the city.</u> Retain clause (iii)		

ICr37B.4 Assessment Criteria	O (partial)	The assessment criteria listed in this rule should be expanded so that the heritage values of the wider inner city area are considered, with particular reference to Trafalgar, Hardy and Bridge Streets. This would enable assessment to go beyond the potential effects on individually scheduled buildings, and would allow for a broader consideration of effects on the heritage of the inner city, including the Inner City Heritage Precincts.. The provisions related to assessing the effects of development on adjacent heritage buildings is supported by HNZPT.	Add the following assessment criteria to ICr37B.4: <u>The effects on the broader inner city heritage values of Trafalgar, Hardy and Bridge Streets, including the impact of the building or alteration on the character and the integrity of the heritage precinct, and the matters contained in the policy on heritage precincts.</u>
ICr.56.5	O	The plan change intends to delete the rule and associated provisions related to the Church Hill viewshaft. One of the reasons provided for this in the 32 Report is that the views 'are now heavily obstructed by the growth of trees along Trafalgar Street'. Individual trees (or groupings of trees) are a less permanent feature of the landscape that hills and plains, and often less permanent than buildings. Judicious trimming of the trees might be warranted to retain the view of Church Hill. This view shaft, as described in the Operative Plan, is a highly significant component of landscape of Nelson. It can be described as an iconic Nelson view.	Retain the operative plan rule relating to the Church Hill / Trafalgar Street viewshaft.
ICr60.1 ICr60.2	S	HNZPT supports these rules as they seek to provide for some minor alteration as permitted, whilst also respecting and	Retain these provisions.

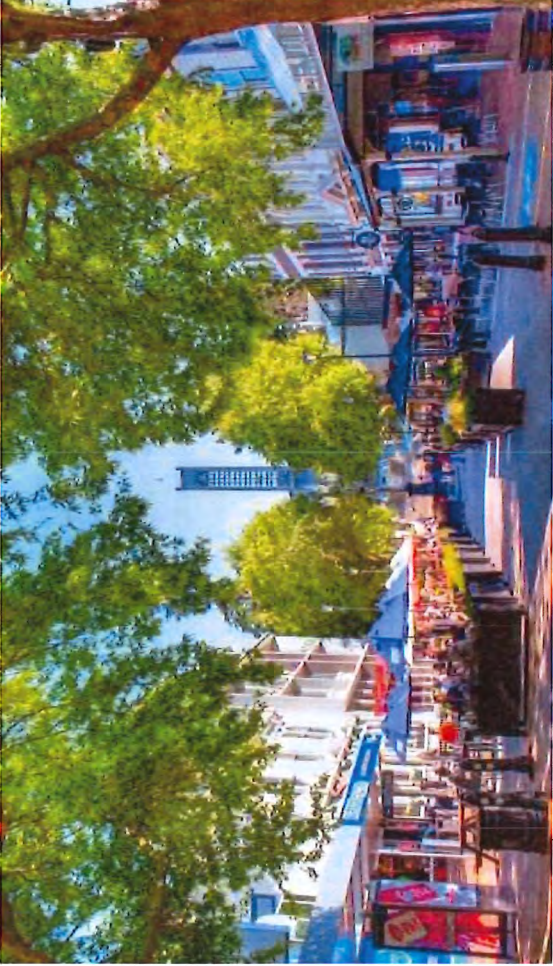
ICr60.3 ICr60.4 ICr60.5 ICr60.6			providing for the heritage values. Specifically, the rules relating to installation of customer connections for network utilities, seismic strengthening, unreinforced chimneys, and sustainable additions are all supported by HNZPT. The rules strike an appropriate balance of allowing essential and desirable changes to heritage buildings, while as much as possible retaining heritage values. The assessment criteria also cover an appropriate range of relevant matters.	
ICr.61		S	HNZPT supports this amendment, which changes the activity status of new buildings on the site of scheduled heritage buildings from Controlled to Restricted Discretionary. Further, HNZPT considers the matters for discretion are appropriate to both provide for and protect the heritage values and provide a consenting pathway where appropriate.	Retain provisions.
ICr.63		S	HNZPT supports the deletion of the reference to Group C places, acknowledging that the Proposed Plan proposed two categories (A and B); both of which are associated with protective rules in the plan.	Retain as proposed.
ICr64.4		S	HNZPT supports the additional clauses relating to the South Street Heritage Precinct.	Retain amendments referring to South Street
ICr.65 Heritage Precincts rules (Inner City Heritage Precinct)		O (partial)	As per our earlier submission points, HNZPT opposes the deletion of reference to the City Centre Precincts. In relation to this point, the following amendments to ICr.65 are needed:	ICr.65 needs to include reference to the City Centre Heritage Precinct. Include the following in ICr.65 (under the Permitted Activity heading):

			1. Include demolition of non-contributing buildings within the Inner City Heritage Precinct as a permitted activity 2. The restricted discretionary rule (ICr.65.4) needs to include reference to the contributing buildings within the Inner City Heritage Precinct This will allow for the protection of historic heritage from inappropriate subdivision, use and development.	<u>ICr.65.3</u> <u>Demolition of non-contributing buildings within the Inner City Heritage Precinct</u> Amend ICr.65.4(a)(i): It is visible from a road or public space within or adjoining <u>Inner City Heritage Precinct</u>, Albion Square and South Street Heritage Precincts; and ...
Appendix 1 – Heritage buildings, places and objects				
Appendix 1 notes	S (partial)		The change from Historic Places Trust to Heritage New Zealand Pouhere Taonga is supported. However the words 'registered' and 'register' need to be changed to New Zealand Heritage List / Rārangī Kōrero. Category I and II (Roman numerals) should also be changed to Category 1 and 2	Retain amendment, with the following amendments: <i>There may be buildings, places or objects that have been ~~registered~~ included on the <u>Heritage New Zealand Heritage List / Rārangī Kōrero that are not included in this Appendix.</u></i> Category <u>1</u> Category ~~II~~ <u>2</u>

				It is important to check the Heritage New Zealand List / Rārangī Kōrero Pouhere Taonga register for any new or changed rankings categorization ...
	Criteria (AP1.1.xiv)	S		HNZPT supports the amended list of criteria.
	Table 1.2b	S (partial)		HNZPT in general supports the revised Table 1.2b. There are a number of minor aspects which should be updated as part of PC29: HPT Rank should be New Zealand Heritage List / Rārangī Kōrero category The Roman numerals should be replaced with '1 and 2'.
	Schedule amendment to names etc	S		The plan change proposes a number of amendments to the names and addresses of places in the schedule. It is important that the places are accurately identified, so that any chance of ambiguity is removed.
	Places deleted from the Appendix 1: 23 Allan Street, category 2, list number 2999	O		The house at 23 Allan Street was constructed in the early 1940s and is part of the architectural legacy of notable local family, the Beatsons. This plastered timber two-storey house is a good example of English Cottage style architecture and has local historic importance because of its links to Nelson's Exclusive Brethren community. HNZPT opposes the deletion of this place in Appendix 1 as it has significant heritage value.
	Places deleted from the Appendix 1: 2 Richmond Avenue, category 2, list number 1580	S		Since this place was first listed in 1982 significant modifications have occurred, which have affected the building's architectural authenticity. Preliminary research into the place's history has not uncovered anything remarkable.
				HNZPT does not oppose removing 2 Richmond Avenue from the appendix
				Amend as follows: ~~HPT Rank~~ New Zealand Heritage List / Rārangī Kōrero Category + and ~~#~~ 1 and 2
				Retain the amendments which provide a more accurate record of addresses and names of properties. Retain this place in Appendix 1.

			2 Richmond Avenue has not retained sufficient values to justify its inclusion in Appendix 1.	
	Places deleted from the Appendix 1: 17 Fifeshire Crescent, category 2, list number 1566	S	Since this place was first listed in 1982 significant modifications have occurred, which have affected the building's architectural authenticity. Preliminary research into the place's history has not uncovered anything remarkable. 17 Fifeshire Crescent has not retained sufficient values to justify its inclusion in Appendix 1.	HNZPT does not oppose removing 17 Fifeshire Crescent from Appendix 1.
	Places deleted from the Appendix 1: 89 Haven Road, category 2, list number 5165	S	Since this place was first listed in 1990 significant modifications have occurred, which have affected the building's architectural authenticity. 89 Haven Road has not retained sufficient values to justify its inclusion in Appendix 1.	HNZPT does not oppose the removal of this place from the heritage schedule.
	Places deleted from the Appendix: 'Fish House' 131 Collingwood Street	S	HNZPT accepts the removal of Fish House from the schedule, as the building has unfortunately been demolished.	Retain amendment removing 131 Collingwood Street from the schedule.
	Places added to Appendix 1: 20 Avon Terrace, category 2, list number 1559 68 Britannia Heights, category 2, list number 9984 93 Champion Road, category 2, list number 1679 223 Waimea Road (former Bishop's residence), contributing place to Bishopdale historic area list number 7475 - Collingwood Street Bridge, category 2, list number 1551 - Former office keeper's house (caretaker's house), contributing	S	HNZPT supports the addition of these places in Appendix 1 because they are entered in the New Zealand Heritage List/Rārangī Kōrero and all have significant heritage value.	Retain these places in Appendix 1

	place to Albion Square historic area, list number 7201			
	Table 1.2c Places with a covenant: • 77 Covent Drive • 79 Covent Drive • 309 Hardy Street • 170-172 Milton Street	O	The proposed plan change continues and extends the flawed approach of omitting places from the Plan provisions which are subject to a heritage covenant. Council has an obligation under the RMA to protect historic heritage; this obligation is not removed by the presence of a heritage covenant, an agreement to which Council is not a party.	Retain these four places in table 1.2a or 1.2b, and delete table 1.2c
Appendix 8 – Church Hill Viewshaft				
	Church Hill viewshaft	O	The plan change proposes to delete appendix 8 from the Plan. The reason provided for this is that the views ‘are now heavily obstructed by the growth of trees along Trafalgar Street’. Individual trees (or groupings of trees) are a less permanent feature of the landscape than hills and plains, and often less permanent than buildings. Judicious trimming of the trees might be warranted to retain the view of Church Hill. This view shaft, as described in the Operative Plan, is a highly significant component of landscape of Nelson. It could be described as an iconic Nelson view. The southern part of Trafalgar Street, the Church Steps, and Church Hill (Trafalgar Street Historic Area – List number 7048) are included in the New Zealand Heritage List / Rārangī Kōrero. The visual and landscape attributes of the area is one of the key components in this listed heritage area. It is the submission of HNZPT that the viewshaft is significant and should be retained.	Retain Church Hill Viewshaft and do not delete as part of PC29.

			<i>Figure 1 Trafalgar Street. Image taken from www.nelsonstasman.nz/visit-nelson-tasman/plan-your-trip/activities/3315-upper-trafalgar-street. downloaded 21/8/2023</i>
Planning Maps – Heritage Precincts			
Inner City Heritage Precinct – Trafalgar Street, Hardy Street, Bridge Street	O	In alignment with the other HNZPT submission points on this topic, HNZPT submits that a Heritage Precinct be established in the Inner City, including the highest heritage value areas of Trafalgar Street, Bridge Street, and Hardy Street. The extent of the Inner City Heritage Precinct should encompass the Operative Plan precincts, but for the sake of continuity should also include the north side of Hardy Street between Trafalgar and Collingwood Streets, and the section of Trafalgar Street between Hardy Street and Bridge Street. The extent of the precinct is illustrated in Figure 2 below.	Amend the planning maps to include the Inner City Heritage Precinct illustrated in this submission point.

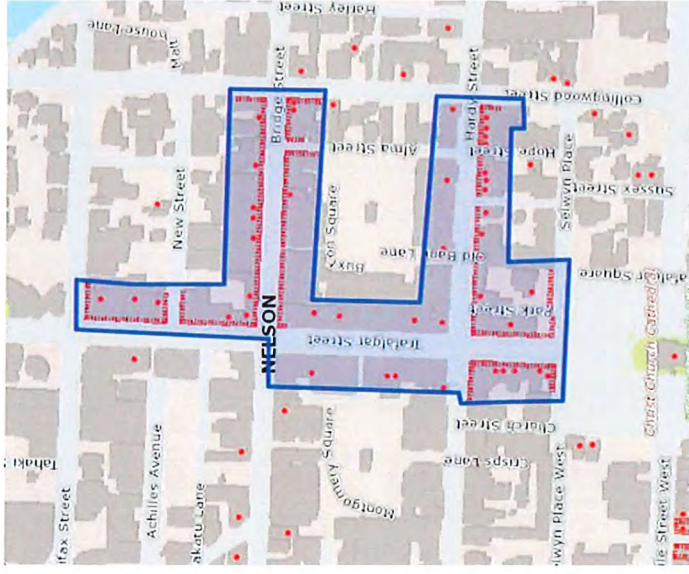


Figure 2: Recommended extent of Inner City Heritage Precinct

It is acknowledged that including a heritage precinct over a portion of the inner city has the potential to reduce the capacity for additional development (including housing) in the city. However, the majority of the Inner City Zone (both IC Centre and IC Fringe) would remain available under PC29 for intensification.

Online submission

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

Submitter No.	S399
Submitter Name	Wendy Drummond
Submitter first name	Wendy
Submitter surname	Drummond
Submitter is contact	Yes
Email	wendyjd10@gmail.com
Wish to be heard	No
Joint presentation	No
Trade competition	I could not gain an advantage in trade competition through this submission.
Directly affected	N/A
Withhold contact details?	No

Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Entire Plan Change	General support	Oppose in part	I support more affordable, sustainable housing & more choice, especially in Nelson CBD. BUT 6 stories are only acceptable where there are other tall buildings. They are not appropriate in Stoke. Nearly 50 % of the CBD is presently car parking, car yards (e.g the new Turners) & roads. Four stories could be as of right in high density, where sunlight is not being blocked for other dwellings. Higher should require consent Distances from boundaries should be re-assessed to ensure buildings don't impinge aesthetically or practically, e.g block sunlight or solar panels.	To review Plan Change 29, taking into account the submissions received & amend accordingly.

Documents included with submission

None

S400

Voided