

Online submission

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

Submitter No.	S339
Submitter Name	Mark Alderson
Submitter first name	Mark
Submitter surname	Alderson
Submitter is contact	Yes
Email	marknz@live.com
Wish to be heard	Yes
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		

To the mayor and all of Nelson's current counsellors.

Subject: Submission on Proposed Plan Change 29 –

I do not support any part of Plan Change 29, with specific emphasis on questioning the need for high density in Nelson, and the potential socioeconomic impact on our community.

As this is the biggest plan change the council has ever undertaken, it is more important than ever that they approach this professionally and objectively.

As a resident who deeply values the well-being and sustainable growth of our city, I believe that a comprehensive and transparent consultation process is essential for any proposed changes to the urban landscape. It is my hope that my concerns, alongside those of other residents, will be given the thoughtful consideration they deserve.

My key Concerns with Plan Change 29 are:

The need for High Density in a city of this size.
Nelson is a historic city, rich in a variety of cultures and interests that attracts thousands of visitors every year. As current inhabitants of this city, we must be mindful of the decisions we make right now, not just for us but for our future generations. With conflicting information used by the council, regarding data, actual population growth, and considering the previous government guidelines on social housing and the way towns and cities in New Zealand should action this. I question

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the council's processes and logic regarding intruding High and Medium Density into the wider residential areas of the city.

Existing High-Density Housing:

I am concerned about the current distribution of high-density housing and its composition in terms of ownership. Understanding the proportion of owner-occupied, rental, and short-term rental properties (such as Air B&B) within high-density housing areas is important for gauging the community's residential stability and sense of place. An example would be the city's current high-density housing. Creating holiday homes or short-term residential second homes does not benefit the economy or the residents. It is not a reason to destroy communities. I fully support all additional housing, be it social or otherwise that enhances and supports the community.

Request: Update all the data to ensure the correct information is being used in any plan changes. If this then finds there is a need for an increase in density, then more options become available. Might I propose that if required, look firstly at medium to high density in the city centre (light purple area on the council's Plan Change 29 map) only. There are many examples of unused commercial properties that would be ideally suited for development. We can see in other cities throughout the country where shared commercial and residential developments benefit the city and its residents. (Sections of Rutherford Street between Hardy and Halifax for example).

With conflicting information by the council, regarding data, actual population growth, and considering the previous government guidelines on social housing and the way towns and cities in New Zealand should action this. I question the council's processes and logic regarding intruding High and Medium Density into the wider residential areas of the city.

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This direction would help to revitalise the city, something I know residents of Nelson are passionate about, and keep intact the rich cultural diversity of its neighborhoods.

Changing Sun/daylight angles and reducing the square meter size of housing sections.

Nelson is the Sunshine city attracting families from all over the world. They come for a better quality of life and living. We have all seen the negative impact of high density in other towns and cities not only in New Zealand but across the world. People choose to move to cities like Nelson because of the light and space it provides, thanks to its current building regulations. In many places across the world high density housing, in particular tall buildings (buildings over 11 meters) are being removed.

Request: Based on the inadequate need for high density and the years of studies, we should be retaining the current building angles. All housing should enhance current neighborhoods and not overshadow them. Current sunshine/daylight angles were created to enhance the quality of people's lives. This can still be achieved with proper planning.

My other areas of concern are:

Lack of Adequate Consultation: The Draft Plan Change 29 if enacted has wide-ranging and significant effects on the character and identity of Nelson. The current consultation process for Proposed Plan Change 29 has been insufficient in providing all affected residents with the opportunity to engage in

Plan Change 29 map) only.

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meaningful dialogue with planners and Elected Members. The initial submission period was not long enough to allow people to make considered responses to the documentation. Going forward with this process, I implore the Nelson City Council to prioritize transparent communication and accessible avenues for public input to ensure that the voices of our diverse community are heard and considered before the Draft plan Change process goes any further. (Facebook should not be the only media used)

Request: a more in-depth explanation for this course of action. Residents deserve the right to access these decisions. Include in this explanation, how qualified the council and its members are to decide on such complex processes. One paid expert to complete any report is insufficient and undemocratic. Lastly, why did the council take the mandatory tier option when Nelson/Tasman is not required under the government proposal?

Social Housing and Quality of Life: While considering changes to our city's planning, it is imperative that the social housing needs of our community are addressed comprehensively. I urge the Council to incorporate provisions that prioritize accessible and affordable housing options, particularly for vulnerable and marginalized populations. Our city's character is enriched by its diversity, and ensuring a range of housing options will contribute to a more inclusive and equitable society. The documentation provided with the Draft Plan

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Change 29 does not address this issue, merely the number of additional housing units that could be added.

Request: The council to visit and make sure all the information used in Plan Change 29 is correct and up to date.

Economic impact

The Analysis does not address the effect this Draft Plan Change 29 would have on Nelson's broader economy. It may be that this level of intensification in residential areas will make the city much less attractive to visitors, investors, potential employers, and employees and will adversely affect the amount of projected housing demand. Certainly, in the area of tourism, the proposed High Density in residential areas will have a negative impact on visitors to what has been a historic city, famed for its colourful streets and safe, welcoming neighborhoods.

Request: Economic analysis is required to address the effects of proposals on the wider economy of Nelson.

Proposed Social Demographic and Socioeconomic Impact: The introduction of high-density housing raises questions about the intended social demographic. It is important to clarify whether these changes are designed to attract a specific socioeconomic group and how this aligns with the needs and aspirations of the broader community. I am particularly concerned about the potential impact of introducing high-density housing on disposable-income households, as this could adversely affect local businesses, especially the

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hospitality industry. Sufficiency of Infrastructure: Any proposed changes must be carefully assessed for their impact on our city's infrastructure. It is essential to evaluate whether our transportation, utilities, and public services can adequately support the increased demands of a growing population. Neglecting this aspect could undermine the quality of life for current and future residents. Schooling Capacity: With potential population growth, it is crucial to address the capacity of our local schools. A thorough analysis of the impact of Proposed Plan Change 29 on schooling capacity is vital to ensure that our educational institutions can continue to provide a high standard of education and accommodate the needs of the community.

Lastly, the panel selecting process looking into Plan Change 29

I strongly do not support the council's current proposal to have only three members on the committee who will make final recommendations to the council. Also as a resident of this city, I do not fully endorse the current candidates selected for this committee.

Request: a minimum of five members for this group. As there is no one member of this current council who is sufficiently qualified in this subject, the most professional course of action would be to choose three independent members from across New Zealand and the two remaining positions should be anonymously selected from the council. As to the Mayor's point, add a local touch.

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In conclusion, I urge the Nelson City Council to address these multifaceted concerns comprehensively as part of the planning process for Proposed Plan Change 29. By fostering an inclusive, informed, and consultative approach, we can collectively shape a future for Nelson that prioritizes community well-being, social equity, and sustainable growth.

Thank you for your time and consideration. I look forward to witnessing the Nelson City Council's commitment to engaging with residents and addressing these critical matters.

Sincerely,

Mark Alderson

cc: Mayor Nick Smith

The entire Council, who have a duty of care for all residents in Nelson.

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Online submission

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Submitter No.	S340
Submitter Name	John Hugo
Submitter first name	John
Submitter middle name	Nicholas
Submitter surname	Hugo
Submitter is contact	Yes
Email	johnhugo@hotmail.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
Entire Plan Change	General opposition	Oppose		

John Hugo

Johnhugo@hotmail.co.nz

23/10/2023

Nelson City Council P.O. Box 645
Nelson 7040 New Zealand

Subject: Submission for Plan
Change 29 - Infrastructure,
Costs, Off-Street Parking,
Development Height/Area
Concerns, and Developer's Levy

To the Members of the Nelson
City Council,

I oppose all parts of the current
plan.

I am writing to express my
concerns and provide input on
Plan Change 29 and its potential
impacts on the current residents
of our city. While I acknowledge
the need for urban development
and improvement of
infrastructure, it is imperative
that the well-being and
livelihoods of the existing
residents are given due
consideration during this
process.

The proposed Plan Change 29
has the potential to bring about
positive changes to our
community. However, it is
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following aspects, associated
costs, potential consequences,
and additional financing
considerations that may
significantly impact the lives of
current residents:

1. Transportation Infrastructure:
The introduction of new
developments and increased

I do not support any part of this
current plan

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23/10/2023

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current residents:

1. **Transportation
Infrastructure:** The
introduction of new
developments and increased

population density may exert pressure on the existing transportation network. As a result, increased congestion, longer commute times, and a potential strain on public transportation services might occur. It is crucial to allocate resources towards the enhancement of roadways, pedestrian pathways, and public transport services to mitigate these issues. If all the population were riding bicycles and using buses there would still be chaos on the roads at peak times. Why Hill Street in Richmond and Suffolk Road in Nelson are not connected as one baffled me completely and has since I chose to make my home here. It would surely make sense to have 3 routes between the two areas?

2. Water and Sewage Infrastructure: With the expansion of urban areas, there will be a greater demand for water and sewage services. Ensuring that the current water supply and sewage systems can adequately support the increased demand is vital. Upgrades and expansions may be necessary to prevent water shortages, ensure water quality, and manage waste effectively. How much redevelopment of the current wastewater facility is required if the HDZ became fully developed as per current plan 29 in a 15 year period?

3. Utilities and Energy Infrastructure: As the population grows, the demand for utilities such as electricity, gas, and internet services will rise. Infrastructure upgrades to accommodate this demand should be carefully planned to prevent service disruptions and maintain the quality of life for existing residents.

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4. Education and Healthcare Facilities: As the city evolves, it is crucial to consider the availability and accessibility of education and healthcare facilities – is the new Hospital really going to address the proposed population growth? Additional residential developments may lead to increased pressure on existing schools and medical centres. Investments in new facilities or expansions may be required to cater to the growing population.

5. Community and Recreational Spaces: Preserving and enhancing community spaces, parks, and recreational areas is essential for the overall well-being of the residents. As the city expands, maintaining these spaces and creating new ones should be a priority to ensure that residents continue to have access to a high quality of life.

6. Off-Street Parking for Cars, Bicycles, and Mobility Scooters: With the increase in population and housing developments, it is vital to consider the provision of adequate off-street parking options for various modes of transportation. This includes sufficient spaces for cars, secure bicycle parking, and designated areas for mobility scooters. Proper planning for parking infrastructure will contribute to reducing on-street congestion and ensuring accessibility for all residents. In my area if our property and the immediate neighbouring properties are developed with 6 (six) storey towers – on 200 sq metres each meaning 87 apartments - and assuming 4 persons per apartment, and the four persons each have one bicycle then you

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7. Excessive Height and Area of Development: Any proposed development's height and area must be carefully evaluated to prevent overshadowing, loss of privacy, and disruptions to the existing urban landscape. Ensuring that new developments blend harmoniously with the surrounding environment and adhere to established guidelines is crucial for maintaining the character of our city. I cannot understand the need for 6 (six) storey developments on 200 (two hundred) square metre sections in the current residential areas. Three storey townhouse style development around open spaces would make more sense in residential areas currently proposed as HDZ. Check out 5/25 Latimer Square in Christchurch as an example of a comfortable 3 (three) storey home in a well planned development. I can see a future in Nelson and for Nelson if this sort of 3 storey townhouse planning were implemented as the HDZ.

8. Developer's Levy for Financing: Given the extensive nature of proposed changes, it is reasonable to consider implementing a developer's levy to help finance the required infrastructure enhancements and community facilities. Such a levy can serve as a dedicated funding source to support the long-term sustainability and well-being of both current and future resident's needs (drinking water supplies, wastewater removal/treatment, power supplies, roading upgrades for more buses)

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9. Cost Implications for Current Residents: While urban development is necessary, it's important to consider the potential financial burden on existing residents. Increases in rates, fees, and other associated costs should be transparently communicated and minimized wherever possible.

10. Development Agency: It is rather imperative that a development agency IS set up as dropping ugly developments all over our town in a piecemeal fashion will detract from the overall appearance and desirability of Nelson as a place to live. Not having a development agency is in my opinion a cowards cop out of the responsibility regarding the development of our city. Can we not simply start in the CBD as there will soon be a plethora of empty space as business continues to fly to out of CBD/town developments.

I urge the Nelson City Council to thoroughly assess the potential impacts of Plan Change 29 on the current residents and take proactive measures to address these concerns. Engaging in open dialogue with the community, conducting comprehensive impact assessments, and implementing mitigation strategies will be instrumental in ensuring a smooth transition and sustainable development.

Can I also ask how can a panel to decide the final outcome of submissions be considered independent if the majority are already quoted in public as supporting Plan 29 as it currently stands.

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Thank you for your attention to these critical matters. I appreciate your dedication to the well-being of our city and its residents.

Sincerely, John Nicholas Hugo

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S341

Voided

Online submission

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Submitter No.	S342
Submitter Name	Christopher Cunningham
Submitter first name	Christopher
Submitter surname	Cunningham
Submitter is contact	Yes
Email	chris@sketchbox.org
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
Residential Zones	High Density Residential Zone	Oppose in part	The proposed High-Density area around Tosswill road and Tamaki street is deeply unsuitable. - The current development of this area is low-density and relatively widely spaced. Building 6-story blocks in this area would be a dramatic and stark change of character. - The hill is steeply sloping, with Tamaki st having a gradient of around 20%. Tall buildings on the hillside will loom over those lower down the slope, and cast extremely long shadows across all the buildings lower down the hillside in the mornings. - Tosswill road is narrow, fairly steep, and winding. It is unsuitable for heavy / additional traffic. - The bottom of Tamaki street (along with the adjacent lower edge of the proposed zone) is a large steep bank, with steps for pedestrians. Adding vehicle access here would be very difficult. If a high-density area is required in Tahunanui, moving the proposed High-Density zone onto the flat area alongside Tahunanui Drive, between the proposed commercial areas on the west side and in the flat area south of that on the east side would make a lot more sense. - These areas already have a more developed character, and high-density housing would fit in better with the proposed taller commercial developments - Building on the flat would remove the exaggerated looming/ shadowing that would result from building on the hill. - As it would be directly on the State Highway, the problems with narrow / winding / steep side streets are avoided.	That Tahunanui hills be zoned no higher than Medium-density, with the proposed High-Density zone from the hill around Tosswill Road and Tamaki Street being removed.

RMA Submission Form for Publicly Notified Plan Change 29

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

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

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

OFFICE USE

Submission No: S343

Date Received Stamp:

20/10/2023

NDOCs No: 539570224-16501

*Required

Submitter Details

Full Name*	MARK ANTHONY FIELDING
Organisation	ECOTECT LTD.
Contact Person	MARK FIELDING
Postal address*	
Telephone*	
Email*	mark@ecotect.co.nz

Trade Competition*

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

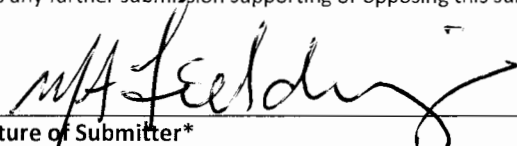
- ☒ I/we **could not** gain an advantage in trade competition through this submission.
- ☐ I/we **could** gain an advantage in trade competition through this submission. *if yes, please complete the following:*
- ☐ I/we **are** directly affected by an effect of the subject matter of this submission that: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

Council Hearing*

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

Public information

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


Signature of Submitter*

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

18-10-23
Date*

RMA Submission Form for Publicly Notified Plan Change 29

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

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

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

My submission is*:

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

That this proposed plan change 29 is about providing for future population increase in Nelson and to some extent, to provide more affordable accommodation options.

I maintain that the proposals to increase residential density in the examples illustrated are flawed.

That there are better, more affordable solutions to address population increase and higher density zoning.

My solutions, explained in detail on attached pages, also demonstrate how the character of Nelson is maintained, how bulk and location rules can be maintained as current, and how all predictions can be fulfilled with very simple and affordable solutions.

Please read attached typed pages.

RMA Submission Form for Publicly Notified Plan Change 29

I seek the following decision from the Council*:

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

To Scrap Plan Change 29 entirely
To diligently study any alternative
Solutions and discuss all pros-
and cons to determine if such
Solutions will adequately address
the projected population increase.
To then consider allowing a change
to the existing NRMP to allow
any solutions without a Resource Consent
and allow a change to 50% site
coverage on sites larger than 400m²
in Standard Residential Zones that
currently have a 40% coverage rule.

Note:

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

NELSON CITY COUNCIL; PLAN CHANGE #29

Alternative Solution Suggestions

1. I am a **licensed architectural designer** based in Nelson since 1980 with 49 years' experience in the construction industries and with over 30 years as director of my own company. I have completed well **over 2000 residential and commercial building projects** all over New Zealand. I have received multiple national and local **design awards**. I started my career in 1974 with the then Ministry of Works in Tauranga.
2. I think the premise of Plan Change 29 to **'go upward'** is **flawed** – I'm sure, instead, we can **'go inward'**. **My proposal to alleviate** potential population growth and housing needs for Nelson, - as **an alternative** to most of the proposed new rules included in Plan Change 29, - is to **maximize and promote** the use of **Secondary Minor Dwellings** on **existing residential properties**.
3. While commonly called **'Granny Flats'**, such small dwellings can provide **affordable housing solutions** for **single** persons, young **couples** and small **families**, as well as aging **grandparents**. I myself live in a **15m2 studio apartment** with my son's family in the house above.
4. Now while so called **'in-fill' development** is **part of** the proposals for Plan Change 29, and while such development has been **an ongoing strategy** for developers and builders in New Zealand now for decades, there are **still many difficulties** under existing legislation in most centres, to allow such development to proceed **without undue cost or 'red tape'**.
5. Auckland City Councils **Unitary Plan**, since around 2016, has cleverly adopted easier paths for **allowing secondary minor dwellings** on **existing** sites, in order to **ease pressure on housing needs** and on their **choked transport infrastructure**.
A few years ago the Auckland City Council, in conjunction with Prefab NZ, launched a **design competition** for teams to come up with ideas **for prefabricated small dwellings between 30m2 and 65m2**.
6. I was involved with a **team in Nelson** including a manufacturer, a structural engineer, students and tutors from **NMIT** and myself as licensed building designer.
Our submission **failed to make the final 12 winners**, - perhaps because we were particularly focused on **practicality** and **cost effectiveness**, rather than on architectural style. – However this housing model being adopted by Auckland City Council seemed to be a perfect solution not just for Auckland but for Nelson and Richmond also.
7. **I sent letters** to both Nelson City Council and Tasman District Council after this process, asking if their proposed RMA plans were **considering allowing** such **secondary minor dwellings**. I did receive a **reply letter** from the **planners at TDC** stating that they already had such changes for some of the older suburbs in Richmond, but that each application would **need Resource Consent** and that **development contribution levies** would be applied to each application.
They were vague on **whether rates would be increased** for such properties.
Nelson City Council made **no response at all**.

So now I am suggesting **Plan Change 29 be thrown out** and instead make these changes, listed below, **to the existing NCC Resource Management Plan**.

These changes outline the benefits that could be realized. There are **actually no 'cons'** that I can think of – none that can't be sorted anyway, without needing such a major change to the streetscapes of Nelson City.

1. No change to existing Daylight controls; which continue to effectively protect neighbours from new developments blocking daylight admission.
Note that Plan Change 29 **eliminates** the road boundary daylight control, which protects public spaces from shading, and it also **eliminates** the Daylight Around control, which provides for small steep sites where daylight over controls are too restrictive. I say that **no change** to daylight Controls is warranted, **leave it be**.
2. No change to yard **Set-backs** from boundaries. At present anyone can build right **up to the boundary** in any Nelson residential properties, provided that **daylight controls** are maintained and that a **fire rated wall** is constructed within 1m from a property boundary.
Plan Change 29 provides for a 1m setback yard to all properties, but there is no need for this, the existing set back rules work fine to protect neighbours.
3. Change to **50% site coverage** (as per Plan Change 29). This **will allow easing** for the implementation of additional minor dwellings that I am proposing.
This would be **limited to residential zones** that are currently restricted to **40% site coverage**. The Wood and other higher density areas would remain at 30% which can be raised to 33% with a discretionary Resource Consent.
4. No change to **existing required car parking spaces** but with a requirement for **1 extra car park** for a new secondary minor dwelling. However such new car spaces (of 15m² minimum) would **not be added to site coverage** unless a garage or carport was built on such. Also any carparks not inside buildings, that are already included in site coverage, **would be removed from site coverage**. Also carparks could be arranged **one behind the other**, as current.
5. Suggestion that a **Resource Consent is not required** unless bulk and location requirements were breached. Similar to Plan Change 29 edicts. However if a Resource Consent was required for any breach of rules, then **affected neighbours would need to sign off** on such; unfortunately this has been relaxed significantly in recent years.
6. **No increase in the proportion of rates** that are based on **land value**, - as land value will not change. However I grant that a second minor dwelling on an existing site with an existing dwelling, would need to be charged rates for infrastructure services and perhaps levies if any.

7. Acceptability for a **contribution to Infrastructure development levy**, of say a flat fee of \$5000. **This is fair** as additional buildings in existing residential areas do put pressure on drainage pipes and such and in some cases roads.
8. Building size to be limited to between a **30m2 Studio** unit up to a **60m2, 2Bedroom** unit. All provided a 50% site coverage rule was adhered to and all other bulk and location rules adhered to.
9. A Secondary Minor Dwelling (SMD), would not only **cater for an increasing population**, regardless of whether such statistical predictions are accurate, but primarily will provide **truly affordable housing**, especially for young growing families that otherwise find it impossible to get on the house ownership ladder. My son is 39, with a wife, both professionals, with 2 kids and they haven't a hope!
10. **Potential build costs** for smaller simple dwellings could be **as low as \$50k** for a 30m2 Studio apartment, especially **if partly owner built** as is provided for in the **NZ Building Act**. A two bedroom 60m2 unit, could be built for around \$150k. Off-site and **prefabricated buildings** could also reduce costs and definitely time frames, which have a flow on effect of **reducing cost while renting**.
11. **Note that this is significantly affordable because there is no land cost at all.**
12. Usage of such secondary minor dwellings would not be restricted to family members. Such could also be **rented out for an income** stream, which still provides for additional housing needs. A condition however would be that such a unit could not be sold and the site **not permitted to be subdivided** – even at some future date. - Current proposals for such applications (all requiring a Resource Consent) are **subjected to discretion** by planning staff, who consider if the proposal as built, would meet future subdivision rules.
This has no logic in my mind when a current proposal would work fine as presented if on the same property - but would be declined because it would not be possible to subdivide at some future date. Surely that would be the responsibility of the owner to agree to at the time of application. This type of thinking may have changed.
13. Construction would be limited to **piled foundations** for future potential **removal or replacement** of the building. This allows for subsequent owners wanting more yard space or wanting a larger unit. It also allows for a seller to remove the building for use on **their next property** or to sell it at a profit.
14. **Small to medium** construction companies could spring up in town to cater for this growing trend, just as they have done for the Tiny House Movement – and those could also be allowed too if **connected to services** on site and if compliant with bulk and location rules. Thus local building companies will add to the **local economy** instead of large corporates building multi-storey steel and concrete boxes **taking profits elsewhere**.

15. This solution is **perfect for young families** either renting or wanting to own. Perhaps banks could allow a 10% deposit for these buildings or a sliding scale, but either way, deposit amounts could be **no more than \$15k** for a 2BR SMD of 60m². Perhaps Council could lobby local banks or provide guarantees for such.
16. The Plans included in the appendix of this submission, are for a modular prefabricated building system. A Studio Apartment at 32m², a 1 BR unit at 43m², a two bedroom unit at 56m² and a different 2BR unit at 60m². These are just some examples of possible designs. These affordable, prefabricated small dwellings can be made from locally milled timber and other local suppliers. Such supply lines keep profits in Nelson and incur the least pressure on the environment through minimal transportation. There are many design variations that can also be built quickly on site - as these are **very simple structures**.
17. Such **modular designs** can be adopted so that **building size can be increased** as needs increase; like with a growing family. While perhaps not suitable for a family with older children, these solutions could adequately house young families **for at least 5 years**. By that time, with the **low accommodation costs**, savings and sale of the Secondary Minor Dwelling, a substantial deposit could be realized for a larger home elsewhere in the city.
18. The NZ Government through MBIE allows for a '**Multiproof**' consenting system where by a company building **several similar builds a year** can apply for MBIE to issue a building consent for those plans. Then the only aspects the local council needs to check is **planning rule adherence**, ground strength and **service connections**. They must also process this within **10 working days** as opposed to 20 working days for regular building consent applications. Thus saving time and money. Local prefab housing companies and their customers will benefit from this lower cost and faster consenting system.
19. Smaller homes are **easier to heat** and so the new H1 energy efficiency requirements could easily be met at design stage. This leads to **lower heating bills** and these new homes will also have **lower maintenance costs** too, than an old house.
20. These light timber frame homes using **local materials** like naturally durable NZ grown timber weatherboards, have much **lower embodied energy** than a large permanent steel and concrete tower block. They have less cost to the buyer and much less cost to the environment with significantly less CO₂ emissions spent.
21. This proposal allows perhaps, for **2 to 4 additional beds per property**. A property of over 400m² that can cater for a Secondary Minor Dwelling **without breaching** bulk and location rules. A double bed provides for 2 beds, so even a studio dwelling can provide 1-2 additional beds.

22. A **conservative estimate** of **half** the residential properties in Nelson that are currently in the 40% site coverage zone, - say **around 10,000 households**; with an additional secondary minor dwelling, could provide an average of 3 more beds per site. That then totals about **30,000 new beds** for the city of Nelson within a few years. (Nelson stats from 2013 show 18,500 households.)
In 2020, Nelson's **population was 52,900**, so this proposal could effectively provide for a **50% rise in population** within a few years – without **any** upward development..! – and low to middle income Nelsonian's will be able to afford this.
23. Large company developers and construction companies, along with other industries like architects, resource management consultants, quantity surveyors, engineers, geotech engineers and land surveyors, would **not** benefit from such small scale lightweight building solutions. Of course none of those considerations are within the reasons for Plan Change 29, so no issues to worry about there then.
24. My proposal is simple; **keep the existing rules** apart from a 10% site coverage increase. Maintain the **existing character of Nelson** as we don't want it looking like ChCh, Auckland or Wellington. It is a main reason we all live here.
Use **existing properties** to sensitively **increase bed numbers** with low profile, small lightweight **removable dwellings** that are priced to **allow young people** (or old like me) to buy or rent them.
This will address both the **population increase concerns**, whether accurate or not, and most of all **address true affordability** while also addressing **sustainable building methods**. **Thank you very much.**

APPENDIX:

1. Auckland City Council **Unitary plan guidelines** for secondary minor dwellings in Auckland. NOTE: I am using this as an example but I think Nelson could reduce the minimum site size for such development to 400m² provided rules are adhered to.
2. Architectural **plans as examples** of secondary minor dwellings. From 32m² up to 60m². These are designed as prefabricated dwellings but they could just as easily be constructed on site.
3. Two photos of a 1BR secondary minor dwelling built in Cambridge as a built example.

APPENDIX #1

AUCKLAND CITY COUNCIL UNITARY PLAN DESIGN MANUAL

UNITARY PLAN APPLY THE RULES

Use the **Building Envelope Checklists**
to apply the rules to your own project



SINGLE HOUSE ZONE

DETACHED HOUSE + MINOR DWELLING UNIT

Version 2
June 2017

Building Envelope Checklists

SINGLE HOUSE ZONE: DETACHED HOUSE + MINOR DWELLING UNIT

This booklet is part two of a series of tools that have been created by the Auckland Design Manual team, to help you navigate the Unitary Plan and work out what you can build on your site. Use it alongside the Easy Guide to the Unitary Plan to understand the rules, and learn how to apply them.

UNDERSTAND THE RULES

APPLY THE RULES

WORKED EXAMPLES

The purpose of the Building Envelope Checklists is to help you to apply the residential standards to your own project. You can use these checklists to establish your basic building envelope, and visualise the development potential of your site. We then recommend you work with a designer to create your final design.

This guide covers the core standards you must meet to build a permitted development (i.e. does not require a resource consent). Development outside of these rules is still possible, but you will have to apply for a resource consent before you can get your building consent.

The Building Envelope Checklists are a supplementary resource, and you'll still be required to refer to the Unitary Plan to ensure that you comply with the statutory requirements. You can use this guide to support your understanding of the new residential standards that are set out within the plan. Please note some of these standards are under appeal, and may be subject to change.

Drop into an Auckland Council service centre and talk to a duty planner if you need further help with interpreting the standards.

ABOUT THE AUCKLAND DESIGN MANUAL:

The Auckland Design Manual is a fantastic free resource that's been created to help you through your design concept and development phase. It's a practical guide that sits alongside the Unitary Plan. If the Unitary Plan is your rule book, think of the Design Manual as your 'how to guide.' You can use it for inspiration and guidance, it will help you to visualise what you can build in Auckland.

The Design Manual can support you through the following stages of your development process:

- Inspiration for what you could build on your site
- Understanding the rules
- Developing a design

1

WHAT IS ON YOUR SITE?



IDENTIFY THE FEATURES ON YOUR SITE

Identify the features on your site, and the constraints that you have to work with.

For example:

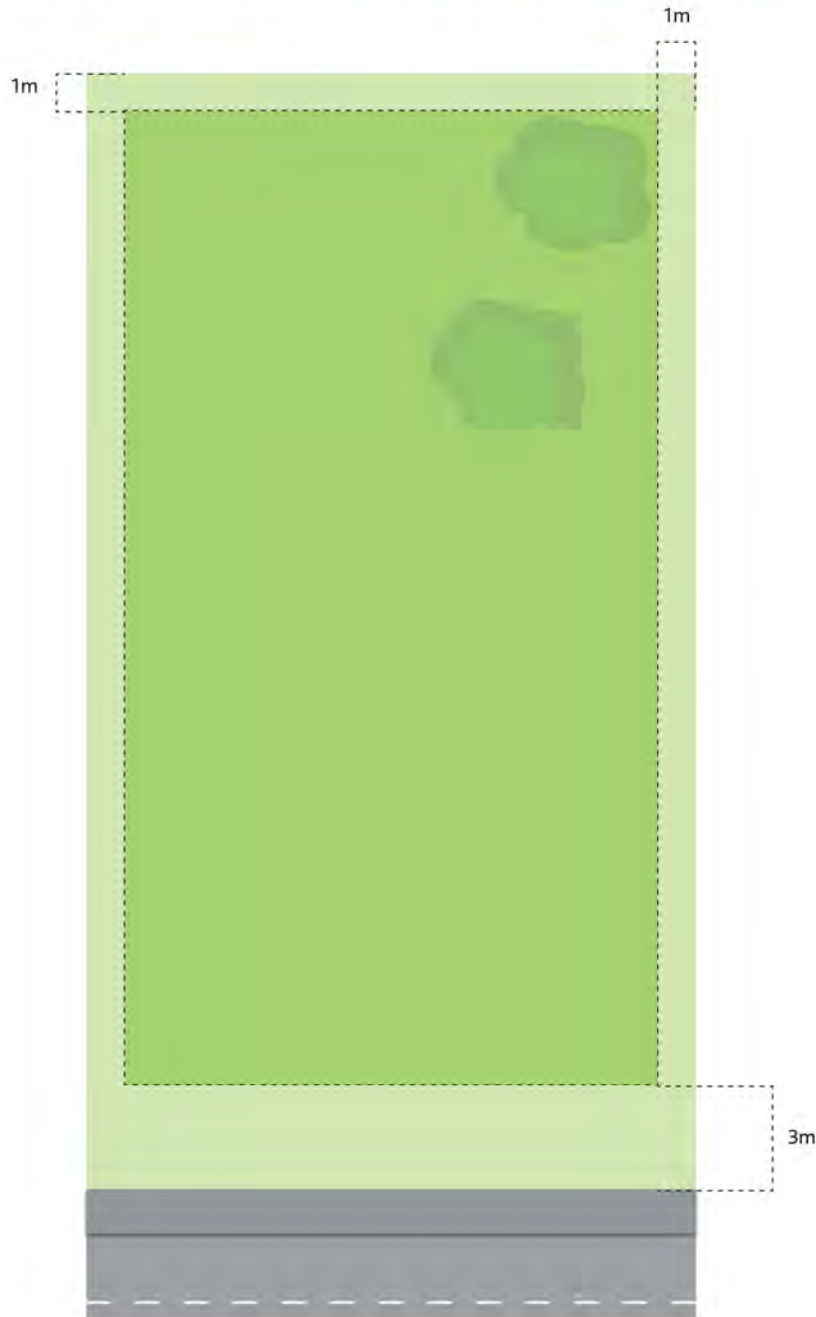
- Slope
- Existing trees
- Existing site access
- Orientation of the sun
- Streams & Waterways (overland flow paths)

These can all be assets to your site, and it usually pays to work with what you've got, rather than investing in expensive earthworks.

There may be other plan overlays on your site, so at this stage it may be a good idea to look at the Unitary Plan, or to give Auckland Council a call and speak to a planner.

2

APPLY YOUR YARD STANDARDS



MARK OUT YOUR YARD STANDARDS

Yard standards mark out the area that you are not allowed to build into. Your yards can be bigger than this, but they are not allowed to be any smaller.

Your minimum yard standards under the Unitary Plan are:

- 3m from front boundary
- 1m from both side and rear boundaries

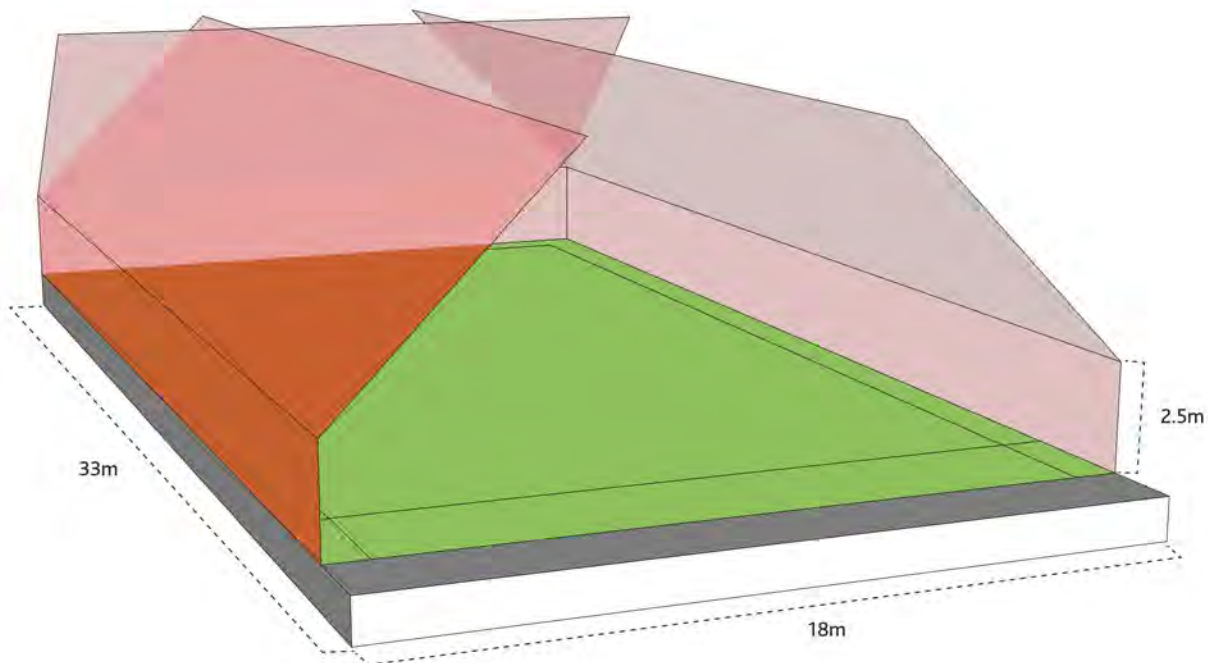
3

APPLY YOUR HEIGHT STANDARDS



ESTABLISH YOUR BUILDING ENVELOPE

Knowing the Height in Relation to Boundary (HIRTB) control will help you to plan the levels in your design. The angled recession planes will likely have an influence on the roof-line, and how you choose to place your building.



CHECK YOUR MAXIMUM BUILDING HEIGHT

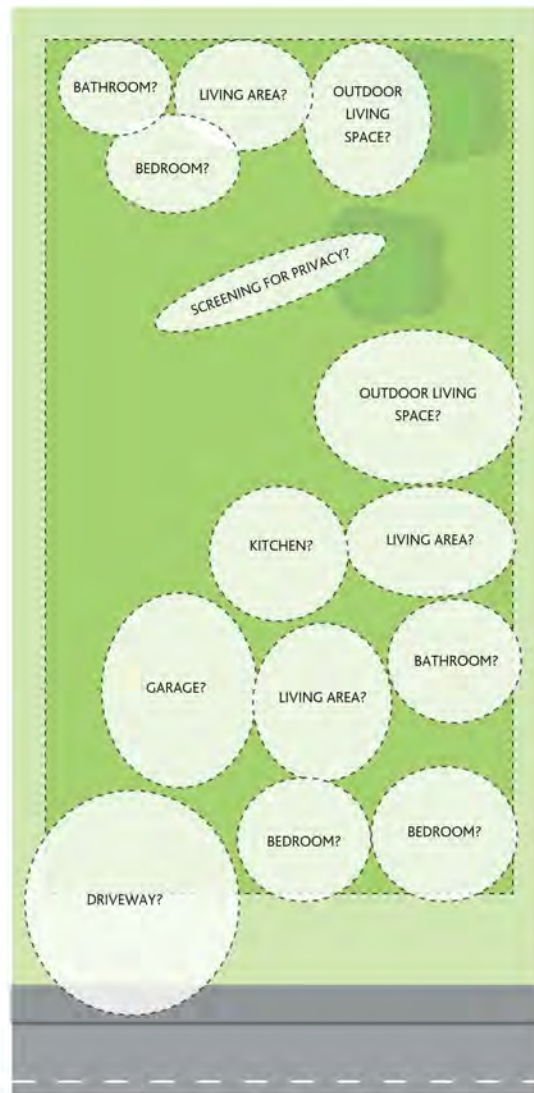
Each zone has different height restrictions. In the Single House Zone the height limit is 8m, plus an additional 1m to allow for the roof form.

Height standards for each zone refer to the maximum height allowed. There are small allowances for roof gables or chimneys – the standards for each zone will explain this.

Measuring height on sloping sites is more complicated, and there are two methods to do this - Rolling Height, and Average Ground Level. We recommend seeking professional advice to see which would work best on your site.

4

PLAN HOW YOU'LL USE YOUR SPACE



KEY THINGS TO CONSIDER WHEN DESIGNING YOUR BUILDING

- Where are your garage and driveway going to go? Remember your front yard must contain at least 50% landscaping
- How many storeys are you planning to have?
- Where will your services go?
- Try to avoid overlooking the neighbours windows and private open spaces
- Think about your outdoor living space - it generally makes sense to have some of your outlook space overlooking your outdoor living area
- Consider your access to sun throughout the day. Is your site north-facing?
- What will your house look like from the street? An attractive property has more value.

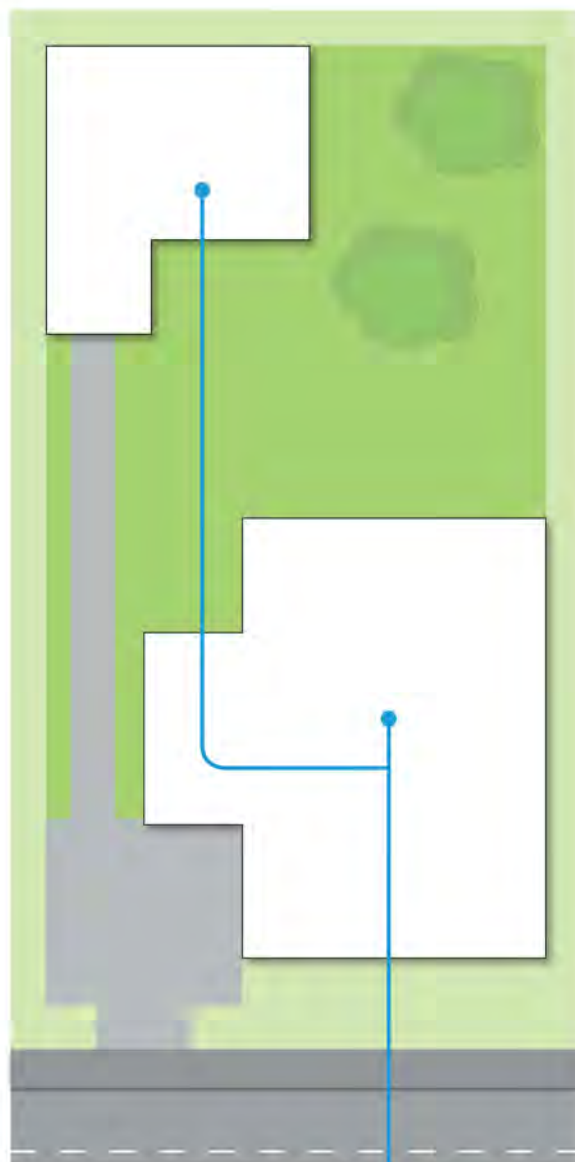
5

PLACING YOUR BUILDING

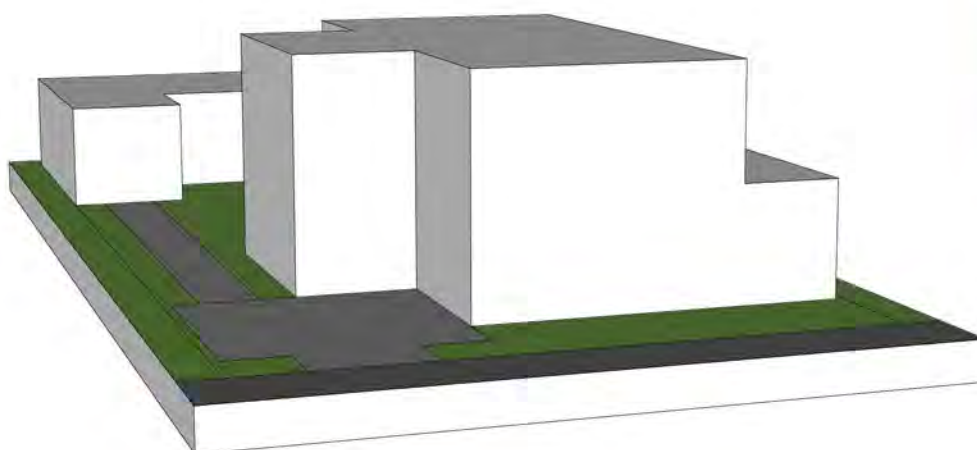


ESTABLISH YOUR BUILDING COVERAGE

- Test your potential building coverage by applying the other standards such as daylight, outlook space, landscaping etc.
- Make sure you have enough space for your outdoor living areas.
- Start to consider your roof line at this point.
- Make sure your minor dwelling unit is less than 65m²
- Both buildings are included in the building coverage percentage.

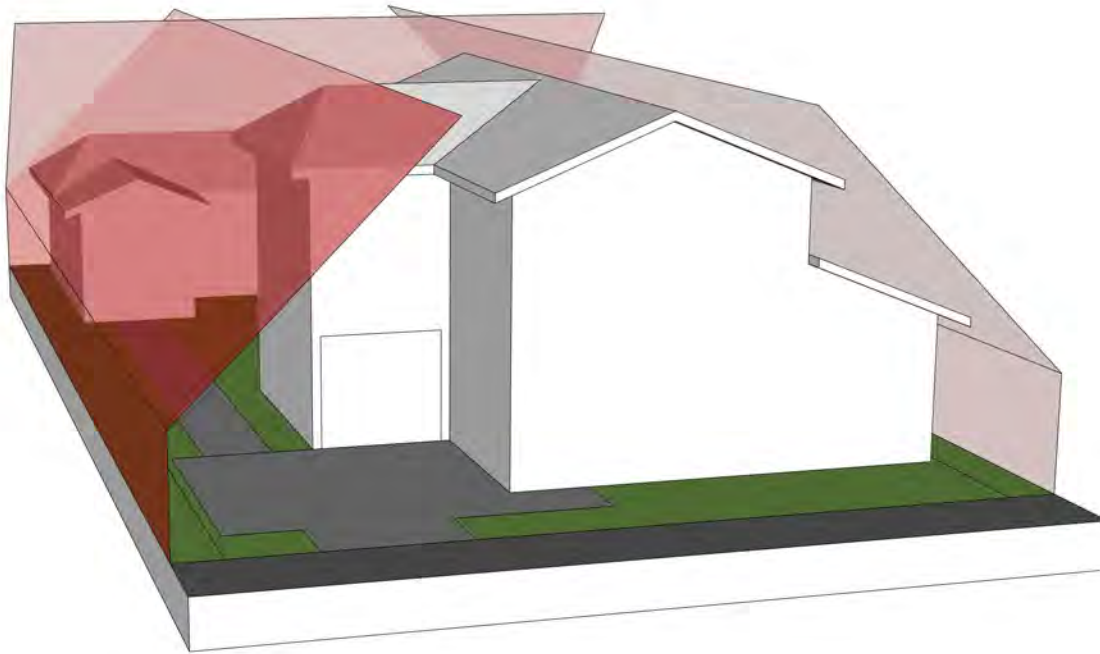


MAXIMUM
35%
BUILDING
COVERAGE



6

CHECK YOUR HEIGHT STANDARDS



MAKE SURE YOUR BUILDING FITS WITHIN THE HEIGHT STANDARDS

- Check your height standards. Is your building under the maximum height for your zone?
- Check your building envelope - does your building sit within the Height in Relation to Boundary controls, or do you need to alter the building form a bit?

7

FINALISE YOUR BUILDING COVERAGE



MAKE SURE YOU'VE COVERED ALL YOUR BASES

Check that you have allowed enough space for:

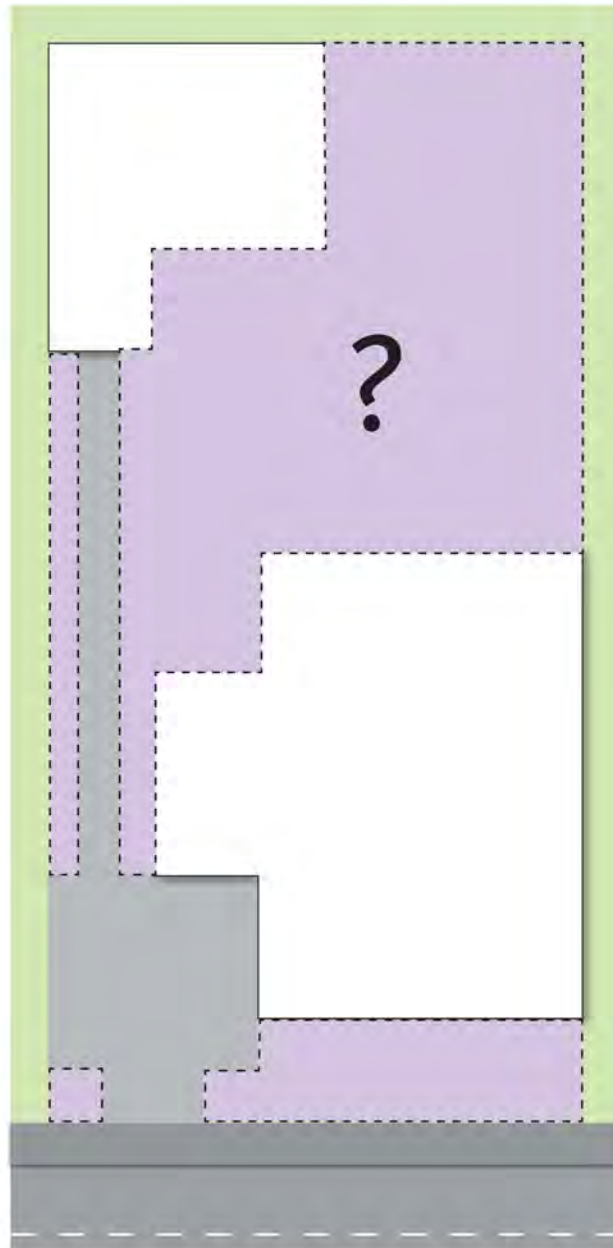
- Outdoor Living Spaces
- Daylight standards between your buildings
- Driveway and parking spaces
- Maintaining privacy and views. Outlook standards don't apply in this zone, but it might be a good idea to think about them anyway, because what your bedroom and living areas look out over is important!

Do any of these factors affect your building coverage?



8

PLAN THE REST OF YOUR SITE

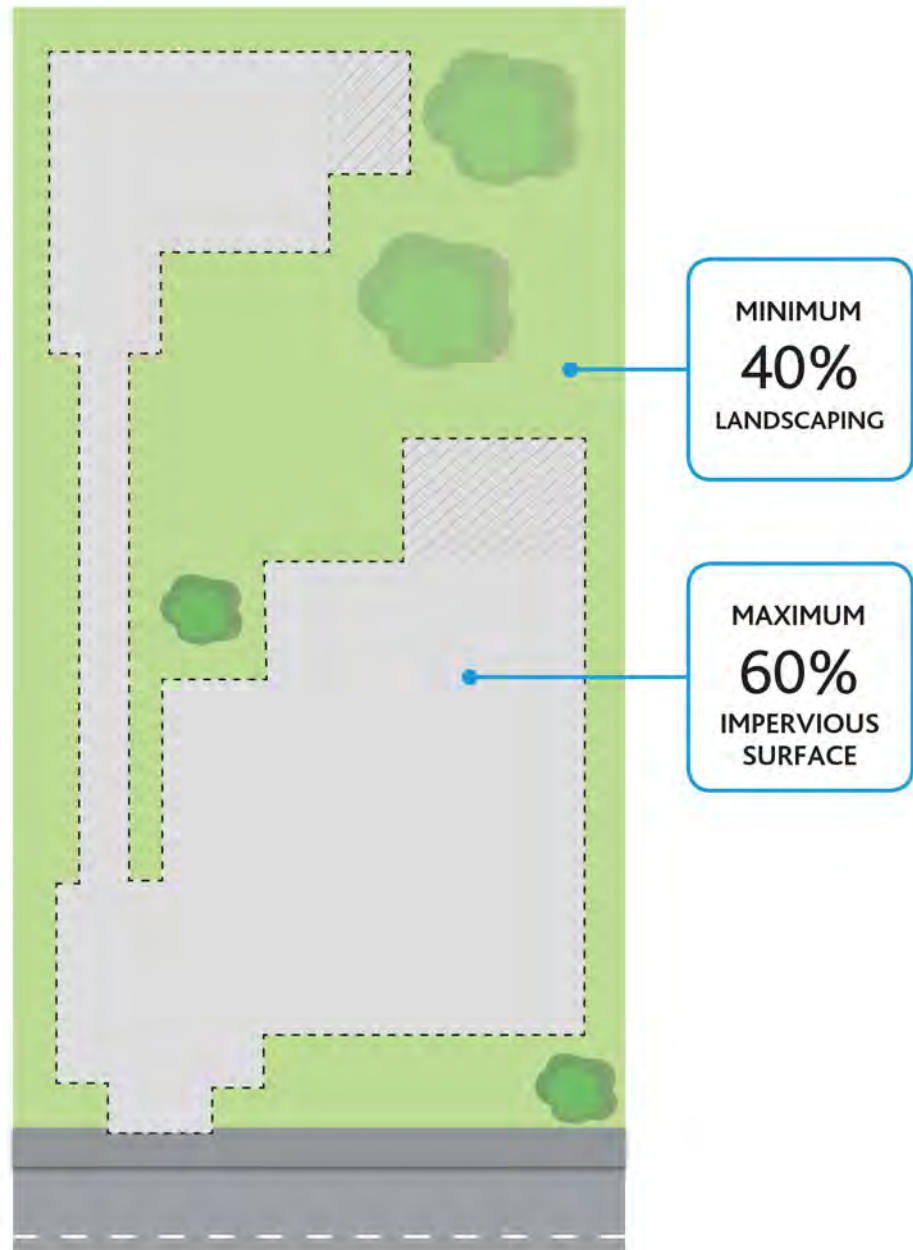


HOW WILL YOU USE THESE AREAS?

- Will you have lawn? Vege gardens? Paved outdoor space? A deck? A pool?
- Remember at least 40% of the site must be landscaped and permeable, including 50% of the front yard
- Consider your access to sunlight - where are your sunny and shaded areas going to be?

9

CHECK YOUR PERMEABILITY



MAKE SURE YOU'VE COVERED ALL YOUR BASES

Your site cannot have more than 60% impervious surfaces - check the Easy Guide for a list of things that can improve your permeability.

At the same time, at least 40% of your site must be landscaped, and contain plants, trees and grass. While 40% is the minimum, and you may want to consider increasing your landscaped area, as it can add more value to your site, and make your property nicer to live in.

10

ONCE YOU'VE COVERED ALL THESE....



YOU HAVE YOUR FINAL BUILDING ENVELOPE!

You have your final building envelope for a permitted detached house with a minor dwelling unit in the Single House Zone.

At this stage, you are ready to start developing a more detailed design in preparation for applying for building or resource consent.



* Can't fit your development into the building envelope? You may still be able to build on your site, but you will have to apply for resource consent as well as building consent. Call Auckland Council to find out more.

YOU MAY ALSO BE INTERESTED IN....

UNDERSTAND THE RULES

Use the Easy Guide to the Unitary Plan to get your head around the residential standards for permitted developments. This guide covers the core standards you must meet to build a permitted development, in plain English with easy to follow diagrams.

WORKED EXAMPLES

The Worked Examples showcase designs that align with the Unitary Plan, to give you clarity around what a great design could look like under the new rules.

DESIGN GUIDES

Delve into the residential design guides to expand your knowledge of how to deliver great value for your project.

These non-statutory guides are based on international best practice standards. Currently the Design Manual has guides for:

- Detached Housing
- Terraces
- Apartments
- Mixed Use developments

Find these great resources at www.aucklanddesignmanual.co.nz



APPENDIX #2

Secondary Minor Dwelling Example #1

32m² Studio Apartment



Mark Fielding

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Cell: 021 158 5024
Em: mark@ecotect.co.nz
Web: www.ecotect.co.nz

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ecotect^{*}
163 CLEVELAND TERRACE • NELSON



Studio Area: 32.32 m²
Deck Area: 11.52 m²



Secondary Minor Dwelling Example #2

43m² 1 Bedroom Minor Dwelling

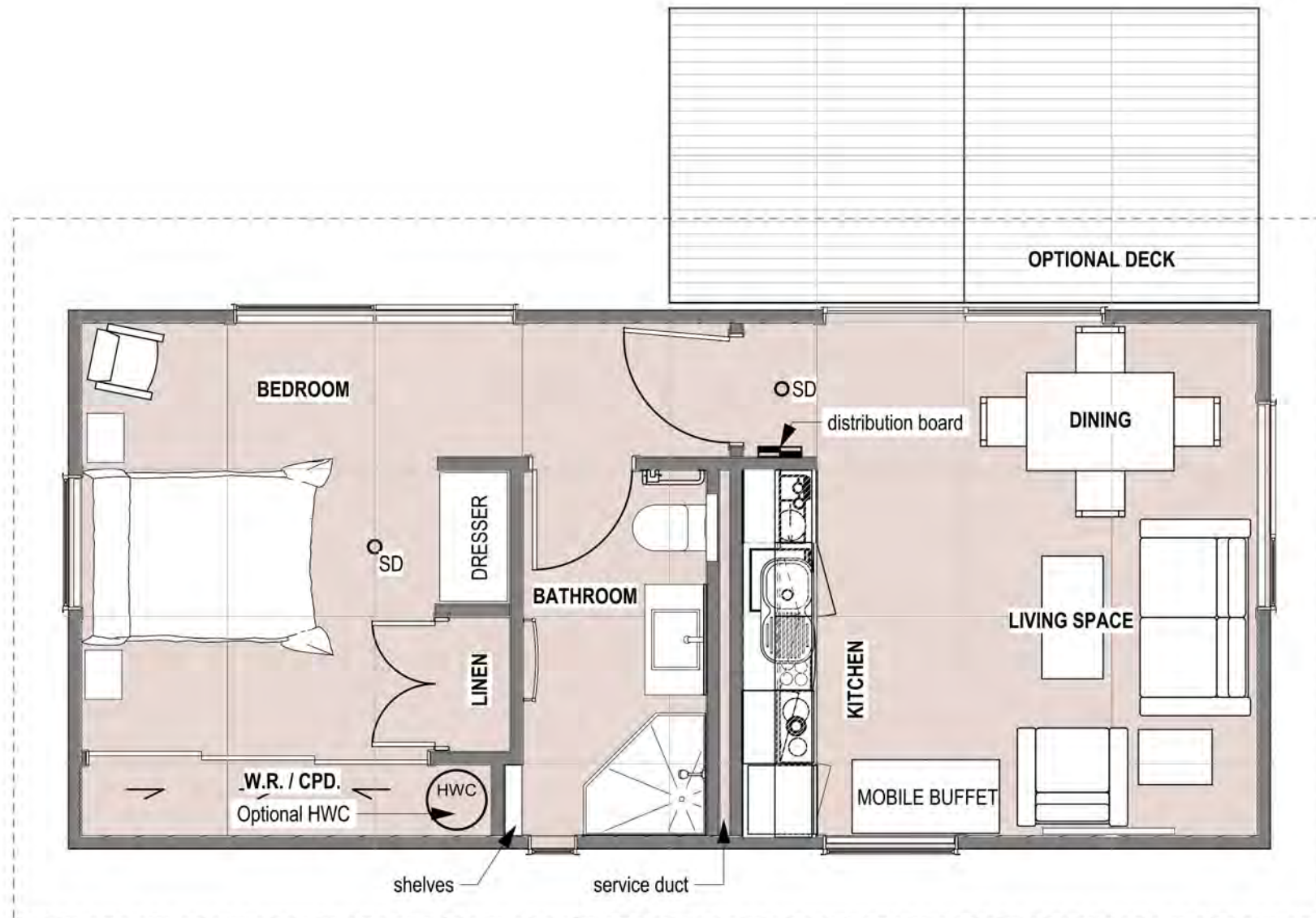


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House Area: 42.84 m²
Deck Area: 11.52 m²

1 Exterior

SITE FIXED ROOFING & FLASHINGS

PRE-FINISHED FASCIA & SOFFIT ASSEMBLIES

OPTIONAL PERGOLA

IGU LOW E
GLAZING
STANDARD

FACTORY
FINISHED DOOR/
WINDOW PANELS

PREFINISHED
BATTENS COVER
PANEL JOINTS

PRE-FINISHED
DOUGLAS FIR SHIPLAP
WEATHERBOARD PANELS

SUREFOOT™ S250
BASEPLATE & MICRO-PILES

PROLAM™ 90x90 H5 PILES

OPTIONAL DECK MODULES
2.4M X 2.4M

PREFINISHED
ALPINECLAD
PANELS

LEVEL ENTRY
THRESHOLD

PROLAM™
H3.2 BEARERS



PREFAB NZ SNUG DESIGN COMPETITION; SNUG #43
SOLABODE MODULAR PREFAB SECONDARY MINOR DWELLING

T8M2-SNUG_1
1:0.719

PERSPECTIVE

Sheet **1** of 32

Model: **#43**

Mark Fielding

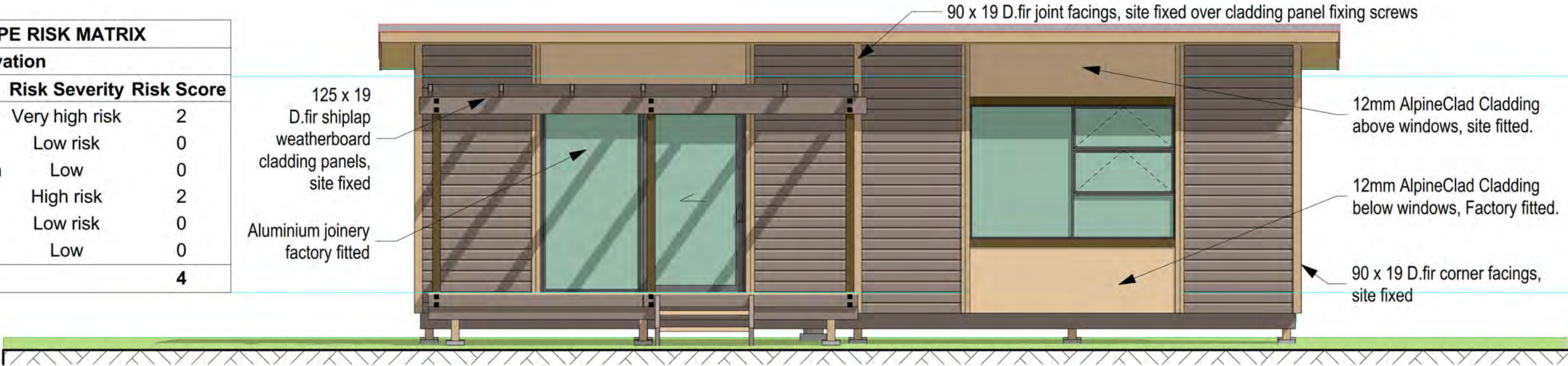
Ph: 03 546 8760
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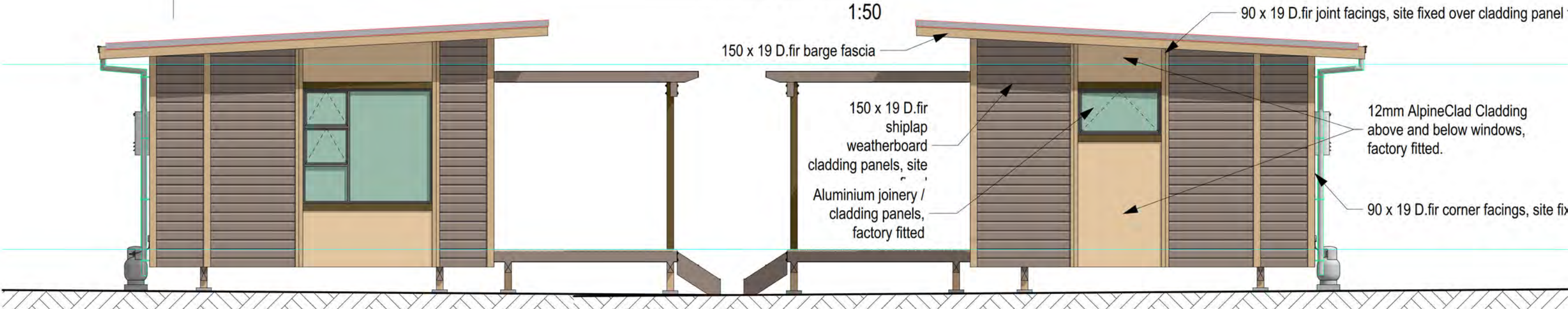
BUILDING ENVELOPE RISK MATRIX		
ALL Elevation		
Risk Factor	Risk Severity	Risk Score
Wind zone (per NZS 3604)	Very high risk	2
Number of storeys	Low risk	0
Roof/wall intersection design	Low	0
Eaves width	High risk	2
Envelope complexity	Low risk	0
Deck design	Low	0
Total Risk Score:		4

Ground Floor



NORTH ELEVATION

1:50

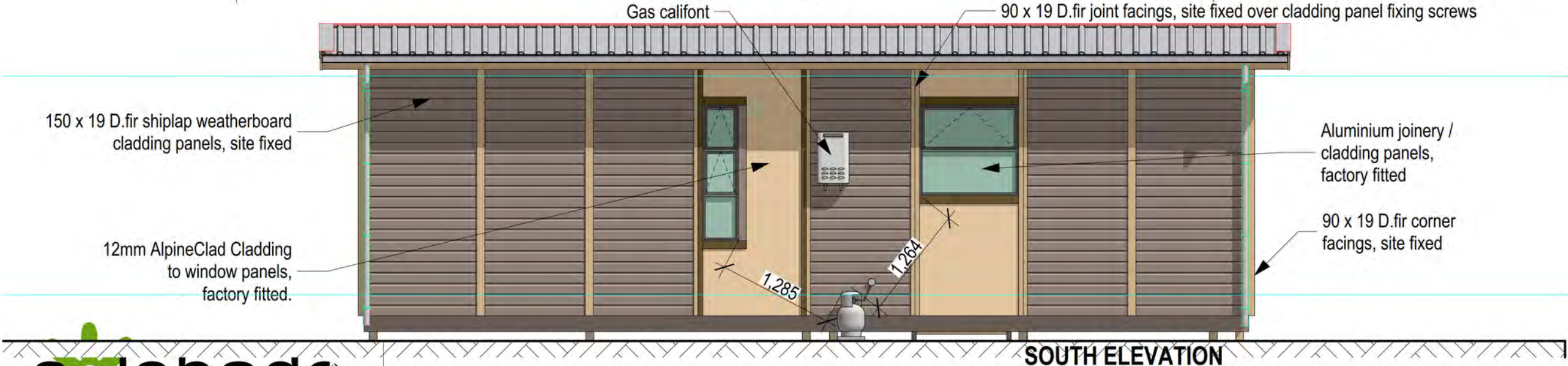


EAST ELEVATION

1:50

WEST ELEVATION

1:50



SOUTH ELEVATION

1:50



PREFAB NZ SNUG DESIGN COMPETITION; SNUG #43
SOLABODE MODULAR PREFAB SECONDARY MINOR DWELLING

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T8M2



ELEVATIONS	
Sheet	13 of 32
Model:	#43





Secondary Minor Dwelling Example #3

47m² 1 Bedroom Minor Dwelling

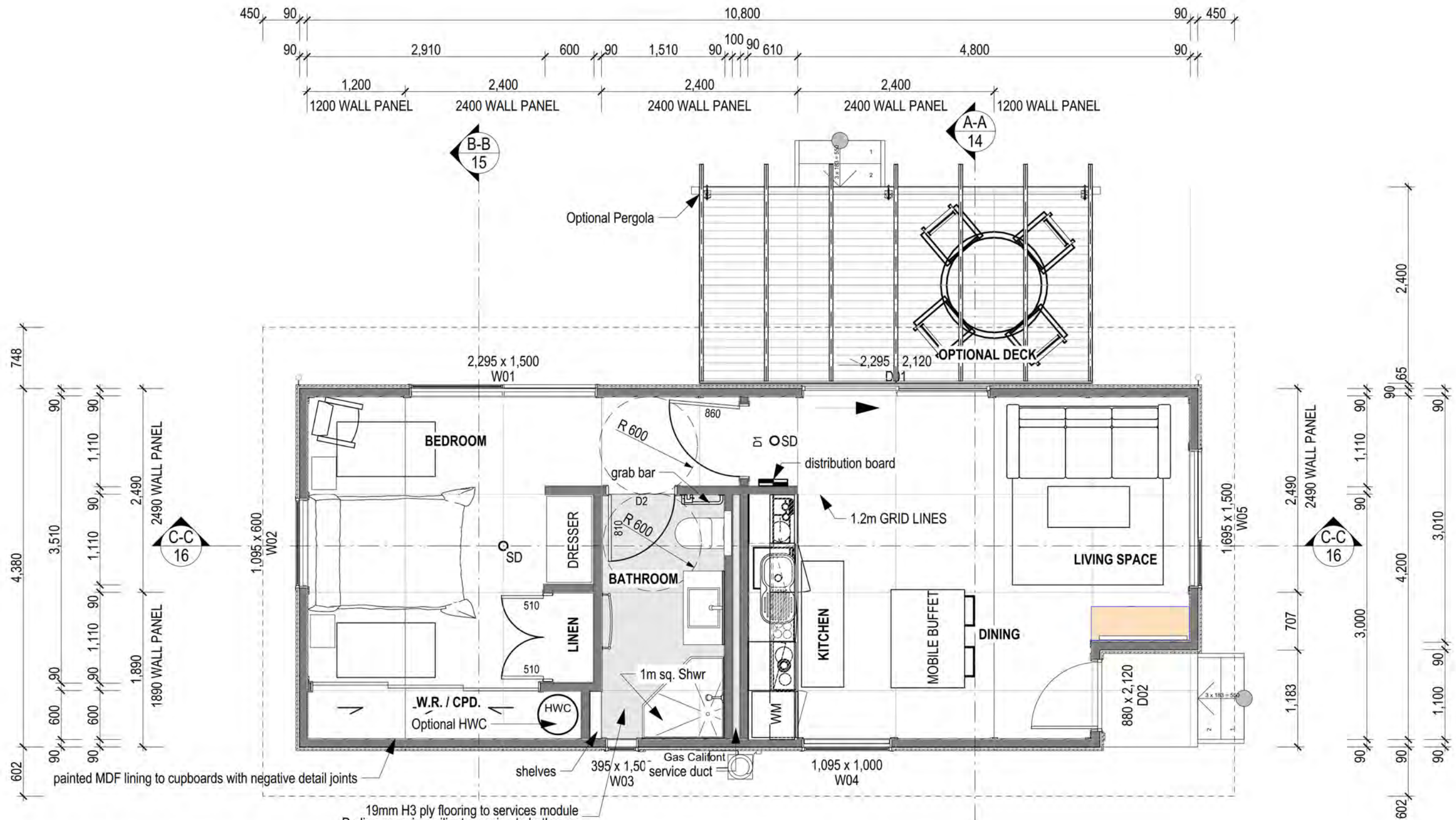


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House Area: 46.70 m²
Deck Area: 11.52 m²

FLOOR PLAN
1:50

SNUG DESIGN; SNUG #47 STYLE B
SOLABODE MODULAR PREFAB SECONDARY MINOR DWELLING

Mark Fielding

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FLOOR PLAN DIMENSIONED	
Sheet	5 of 32
Model:	#47B



BUILDING ENVELOPE RISK MATRIX		
ALL Elevation		
Factor	Risk Severity	Risk Score
Number of storeys	Very high risk	2
Roof intersection design	Low risk	0
Roof depth	Low	0
Roof complexity	High risk	2
Roof sign	Low risk	0
Risk Score:	Low	0
		4

Ground Floor





NORTH EAST PERSPECTIVE

1:117.037



SNUG DESIGN; SNUG #47 STYLE B
SOLABODE MODULAR PREFAB SECONDARY MINOR DWELLING

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PERSPECTIVE

Sheet **1** of 32

Model: **#47B**



D-00

INTERIOR PERSPECTIVE

1:141.180



SNUG DESIGN; SNUG #47 STYLE B
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PERSPECTIVES

Sheet **2** of 32

Model: **#47B**

Secondary Minor Dwelling Example #4

56m² 2 Bedroom Minor Dwelling

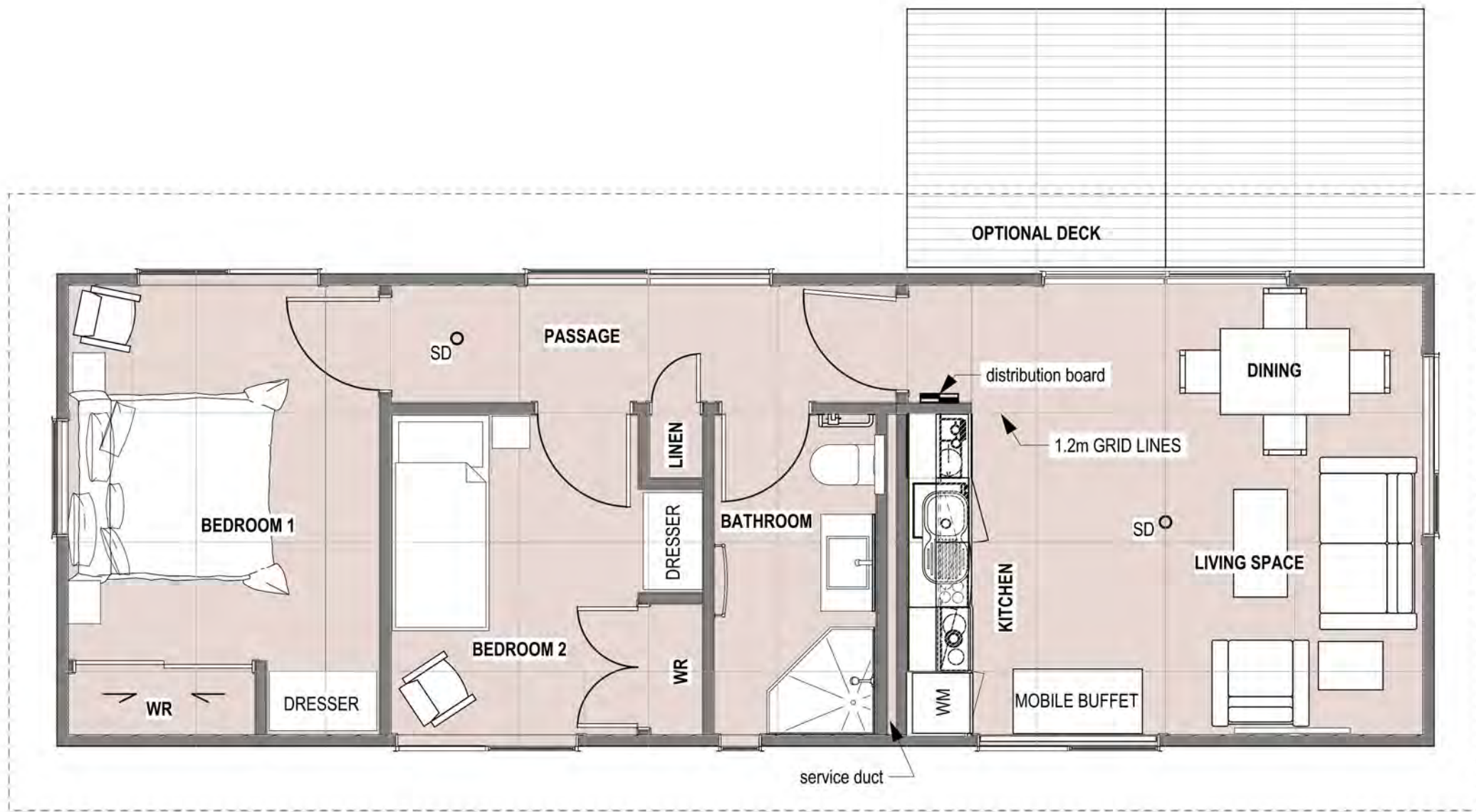


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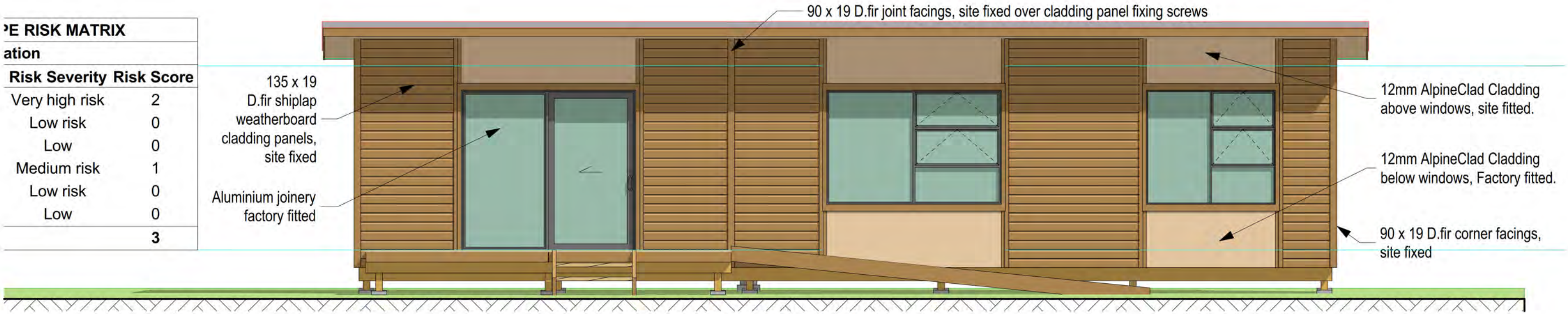
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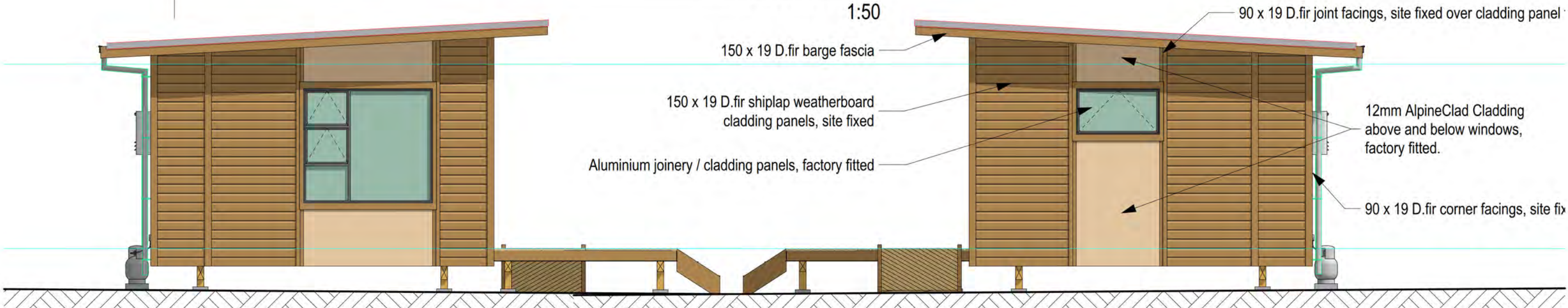
House Area: 55.98 m²
Deck Area: 11.52 m²

RISK MATRIX	
ation	
Risk Severity	Risk Score
Very high risk	2
Low risk	0
Low	0
Medium risk	1
Low risk	0
Low	0
	3



NORTH ELEVATION

1:50

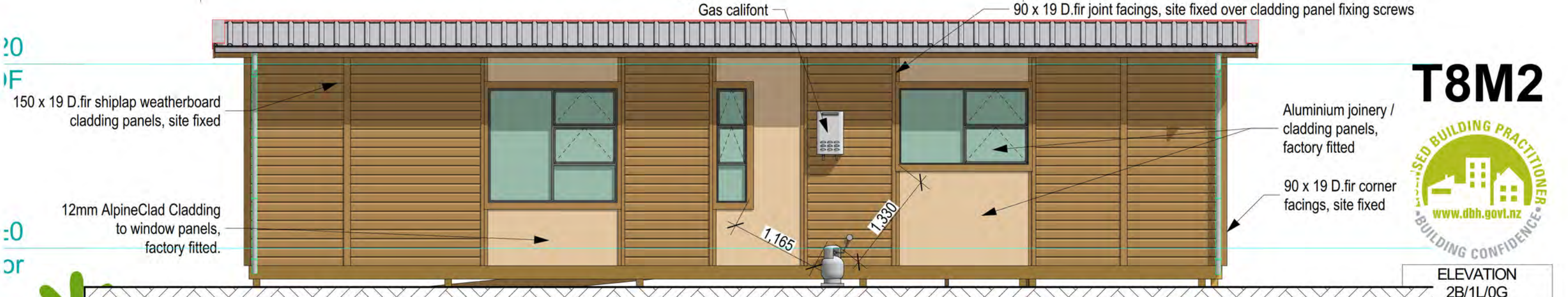


EAST ELEVATION

1:50

WEST ELEVATION

1:50



SOUTH ELEVATION

1:50

PREFAB NZ SNUG DESIGN COMPETITION; SNUG #56
SOLABODE MODULAR PREFAB SECONDARY MINOR DWELLING



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T8M2



ELEVATION	2B/1L/0G
Sheet	13 of 32
Model:	#56



Secondary Minor Dwelling Example #5

60m² 2 Bedroom Minor Dwelling

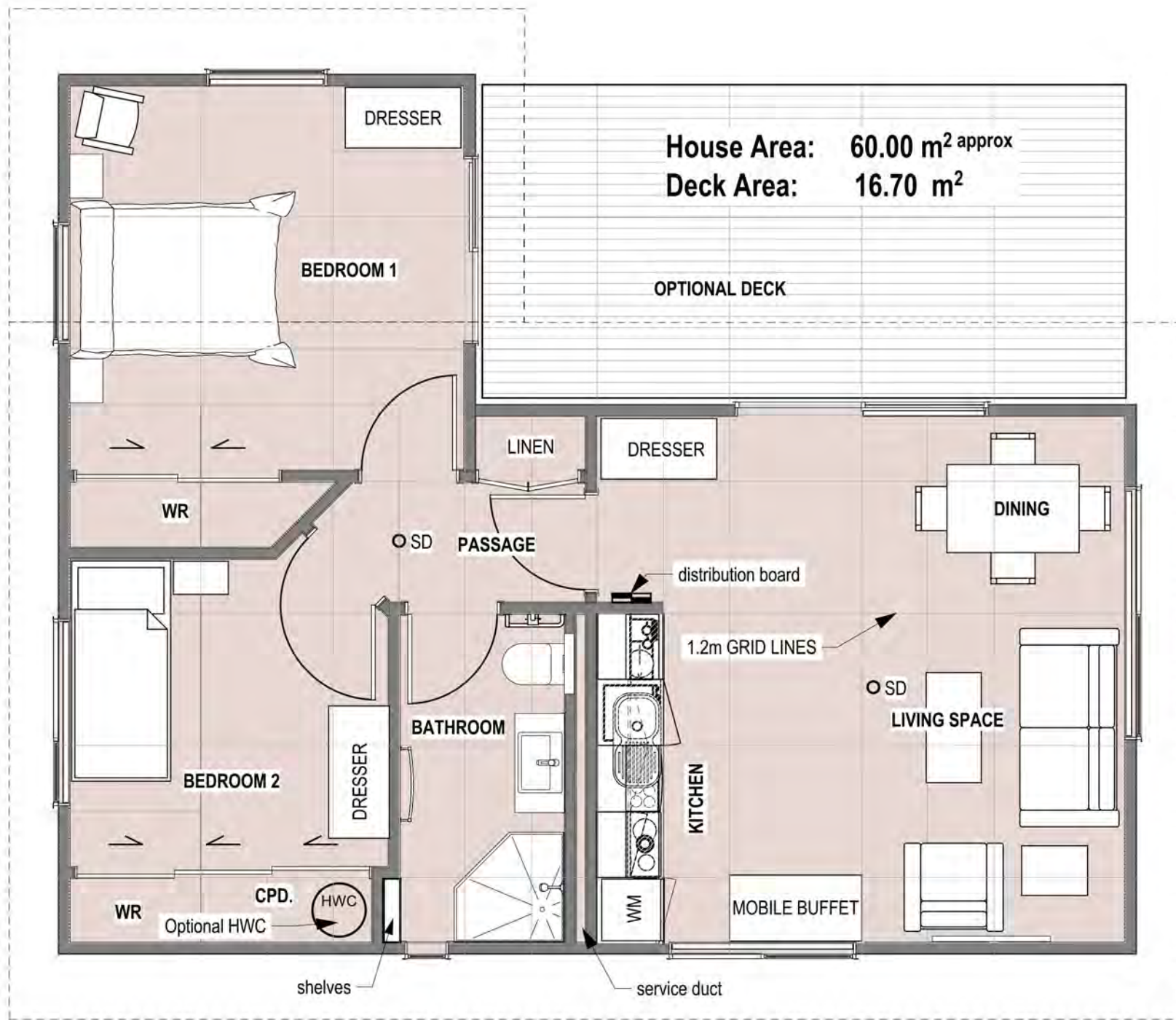


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SNUG 60 v2_render1
1:0.321



SNUG 60 v2_render2
1:0.644



SNUG 60 v2_render3
1:0.645



SNUG 60 v2_render4
1:0.644



SNUG 60 v2_render5
1:0.645

Secondary Minor Dwellings

All Examples and Features



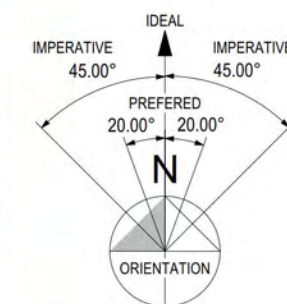
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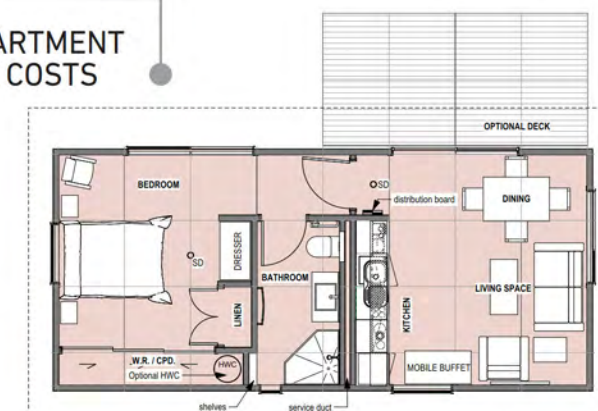
1 Exterior



Snug 32
 STUDIO APARTMENT
 AT \$70K + ON-SITE COSTS

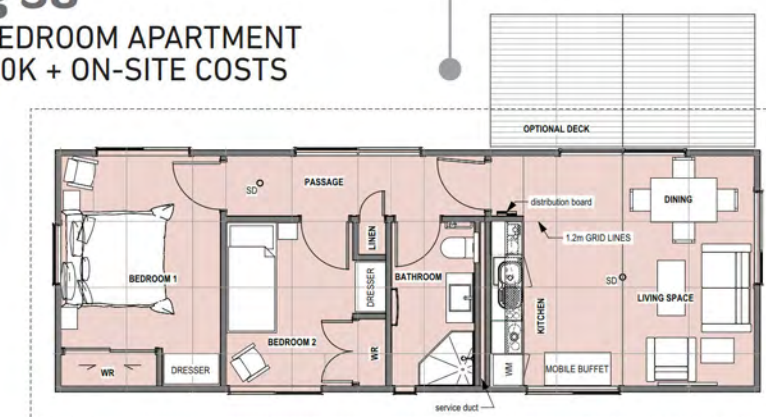
Studio Area: 32.32 m²
 Deck Area: 11.52 m²

Snug 43
 ONE BEDROOM APARTMENT
 AT \$90K + ON-SITE COSTS



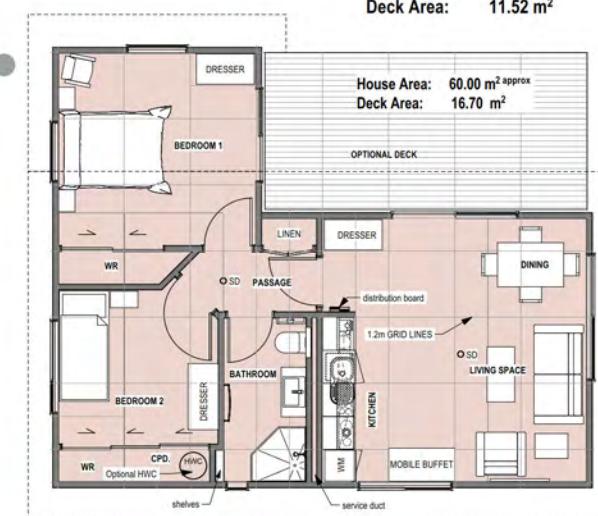
House Area: 42.84 m²
 Deck Area: 11.52 m²

Snug 56
 TWO BEDROOM APARTMENT
 AT \$110K + ON-SITE COSTS



House Area: 55.98 m²
 Deck Area: 11.52 m²

Snug 60
 TWO BEDROOM APARTMENT
 AT \$120K + ON-SITE COSTS



House Area: 60.00 m² approx
 Deck Area: 16.70 m²

Snug 32

In Paint Finish



Snug 43

In Stain Finish

Snug 56

In Stain Finish

Snug 60

In Paint Finish

All Snugs Feature

- Made almost entirely of one material; durable, chemical-free Douglas fir timber.
- Attractive yet simple, comfortable yet energy efficient, modest budget minor homes.
- Locally sourced, natural and healthy, sustainable materials & components.



T8M2

2Interior

Colour
Palette

Cabinetry

MDF
Ceiling

Internal
MDF Walls

Douglas
Fir Wall
Lining

Douglas
Fir T&G
Flooring

PRE-FINISHED MDF CEILINGS TO ROOF CASSETTES

PREFINISHED MDF INTERIOR WALL LININGS

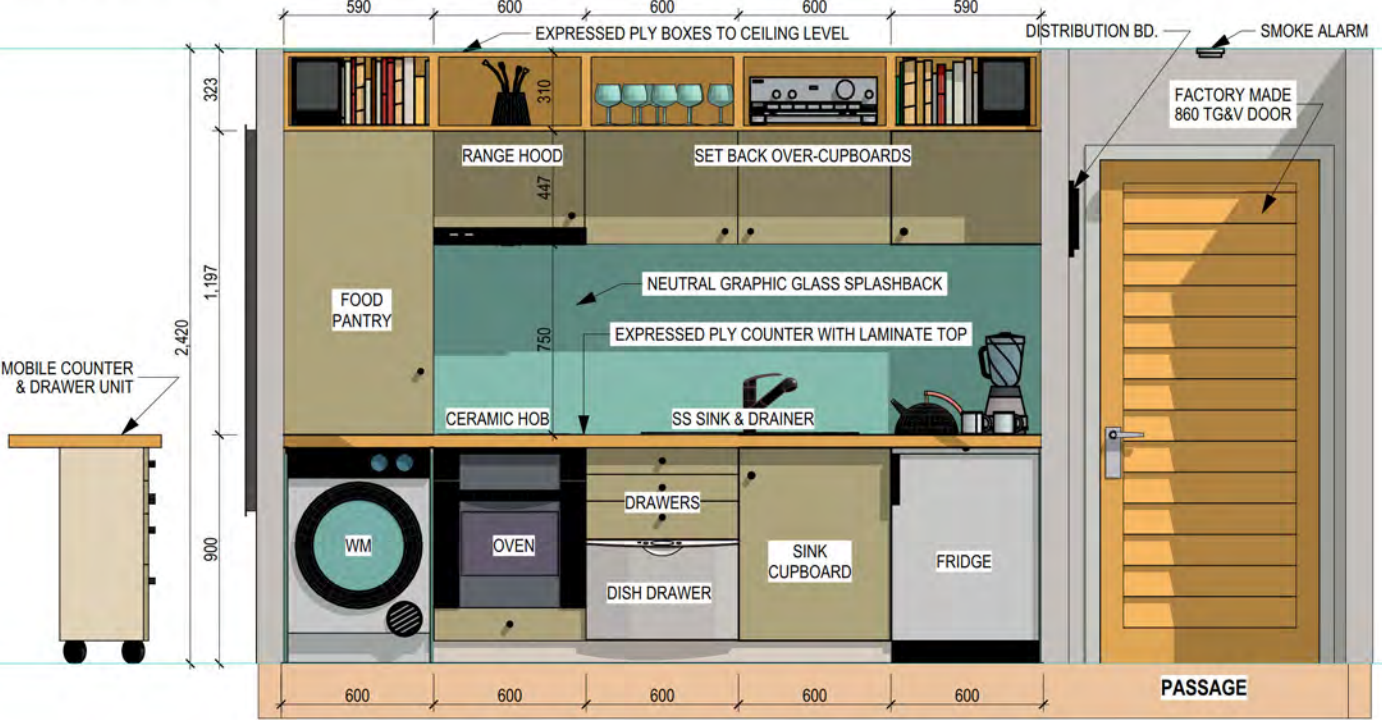
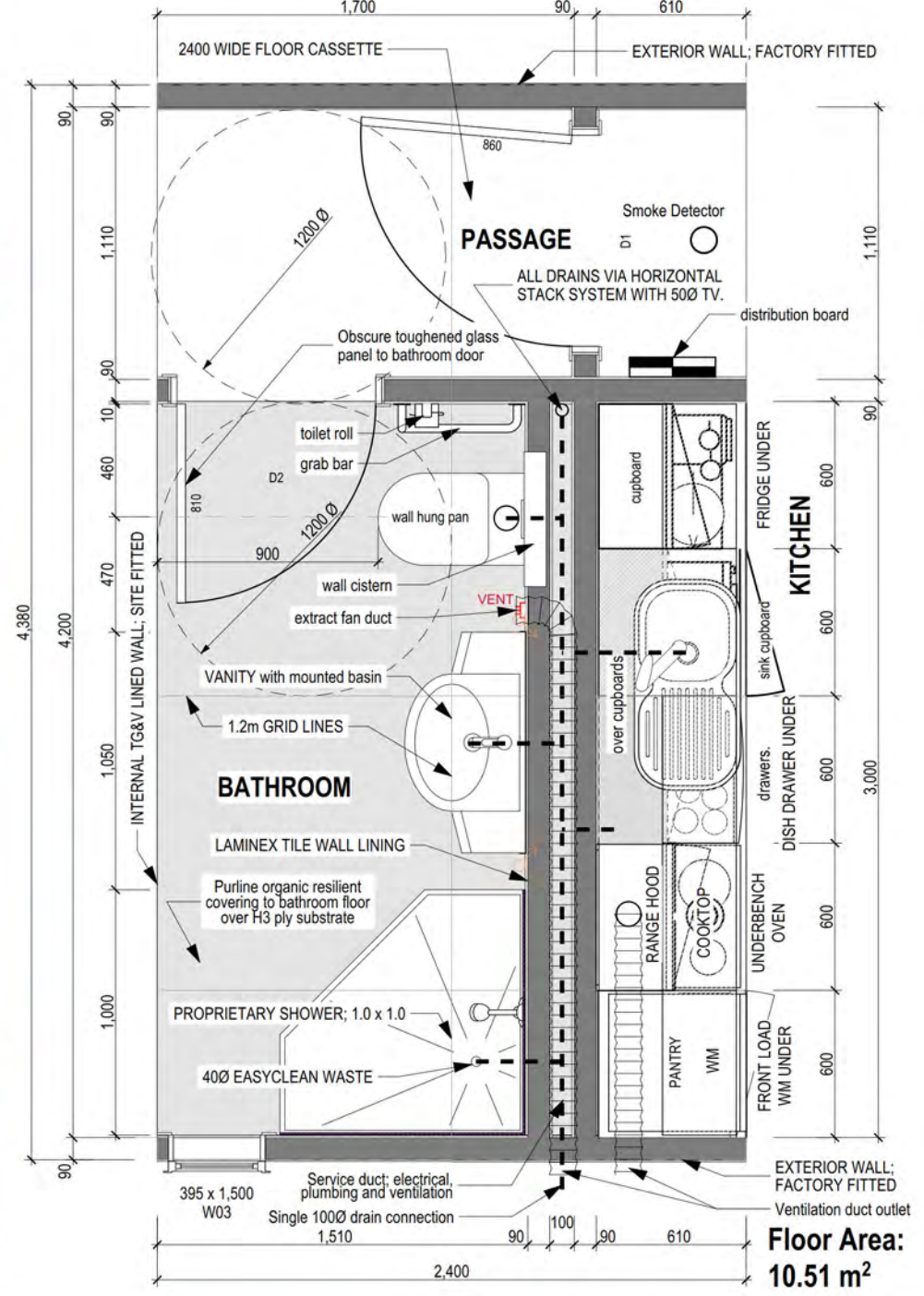


MOBILE COUNTER & DRAWER UNIT
TO EXTEND KITCHEN AMENITY

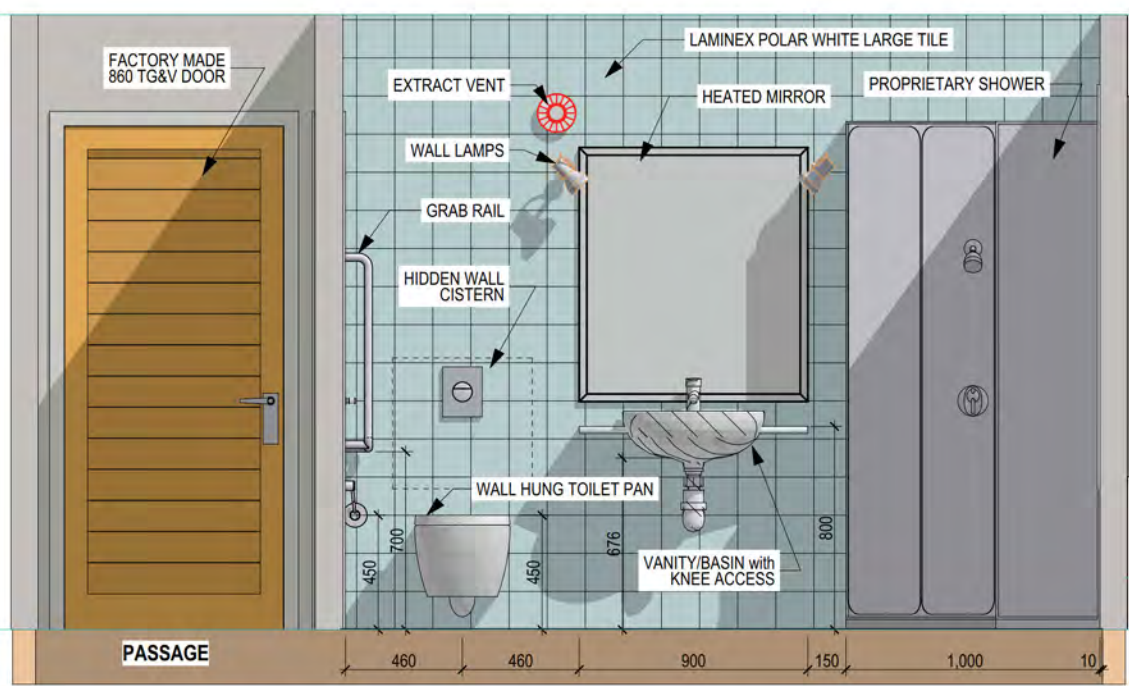
SERVICES MODULE IDENTICAL
TO EACH SNUG MODEL

DARK STAINED & OILED
DOUGLAS FIR T&G FLOORING

'BLONDED' DOUGLAS FIR
TG&V INTERNAL WALL LININGS



Services Module Kitchen Elevation



Services Module Bathroom Elevation

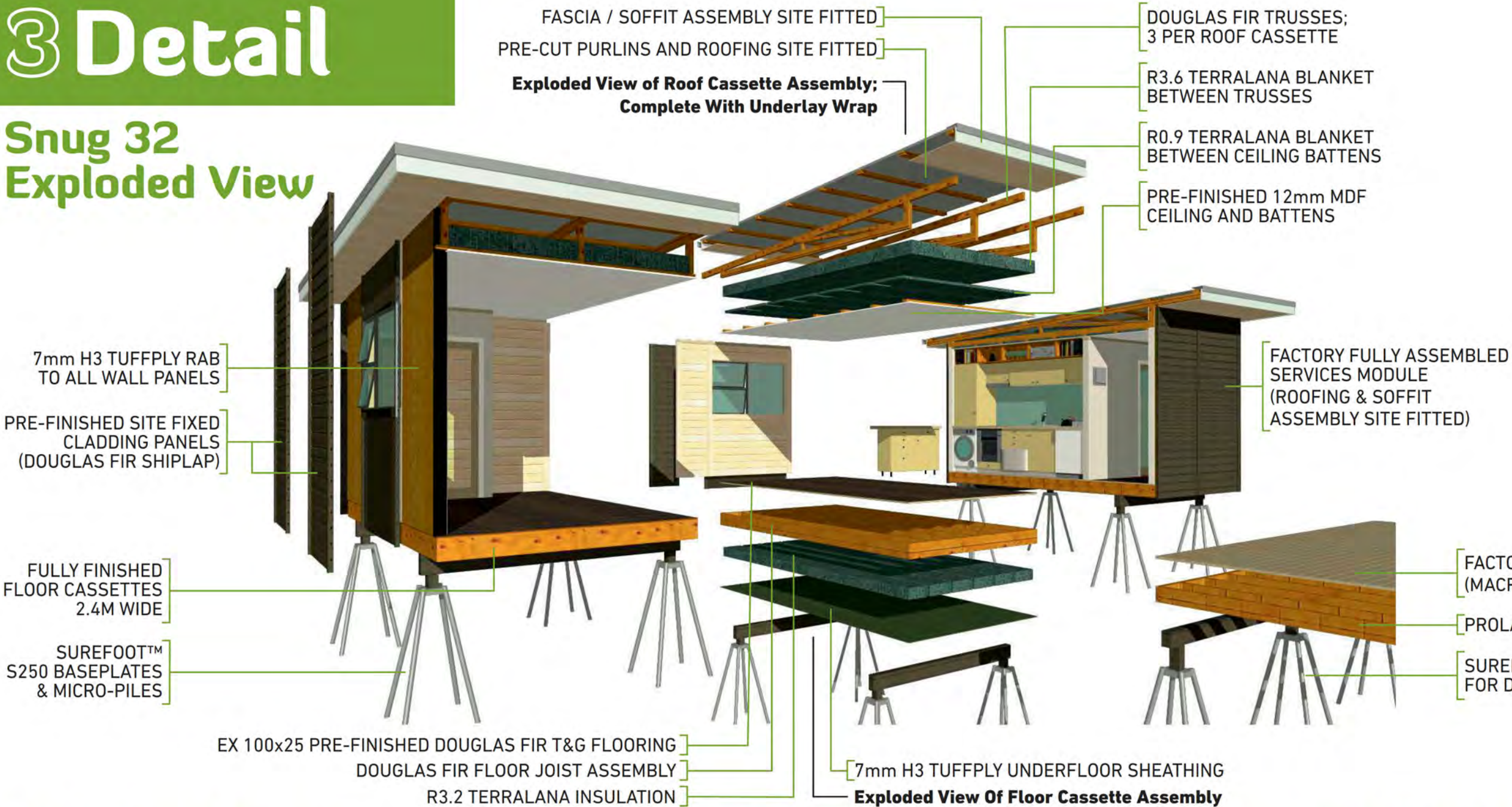
Factory Finished
One Piece
Services Module



T8M2

3 Detail

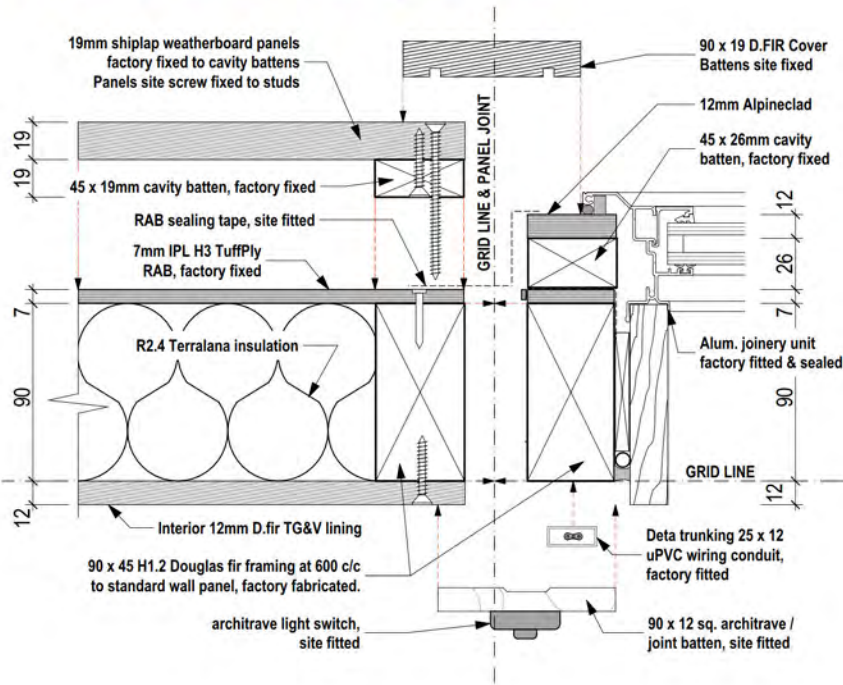
Snug 32 Exploded View



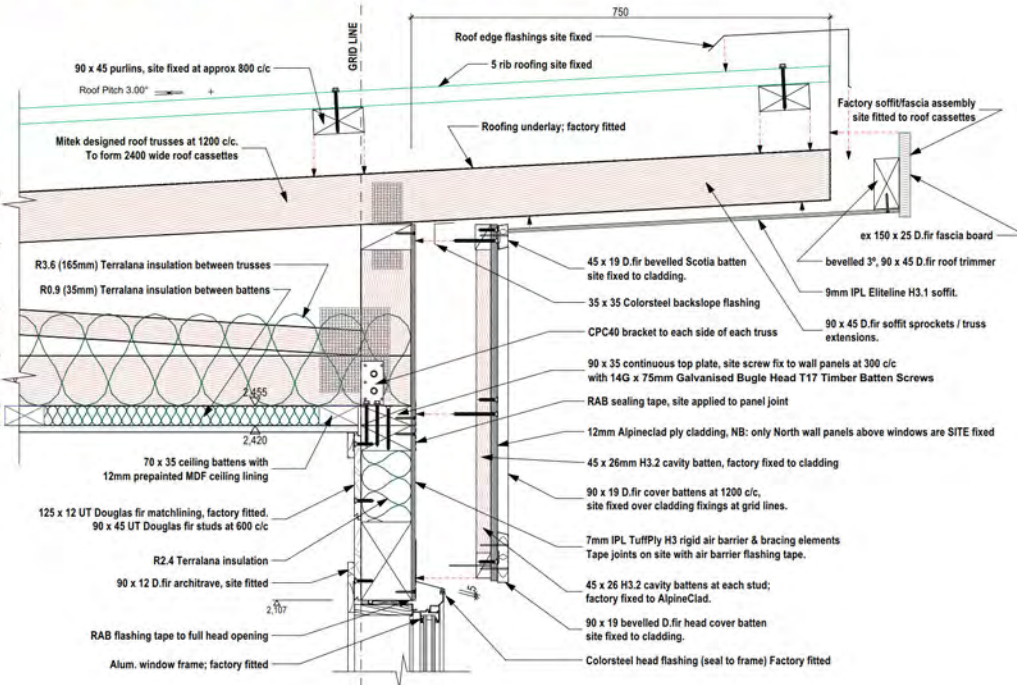
On Site Works Program

- Day 1:** Foundations and site services completed.
- Day 2:** Truck unloads directly onto bearers; building closed in.
- Day 3:** Purlins and roofing fitted, flashings & soffit assemblies fitted.
- Day 4:** Cladding panels fixed, joint battens and trim fitted.
- Day 5:** Services connected and commissioned, move in.

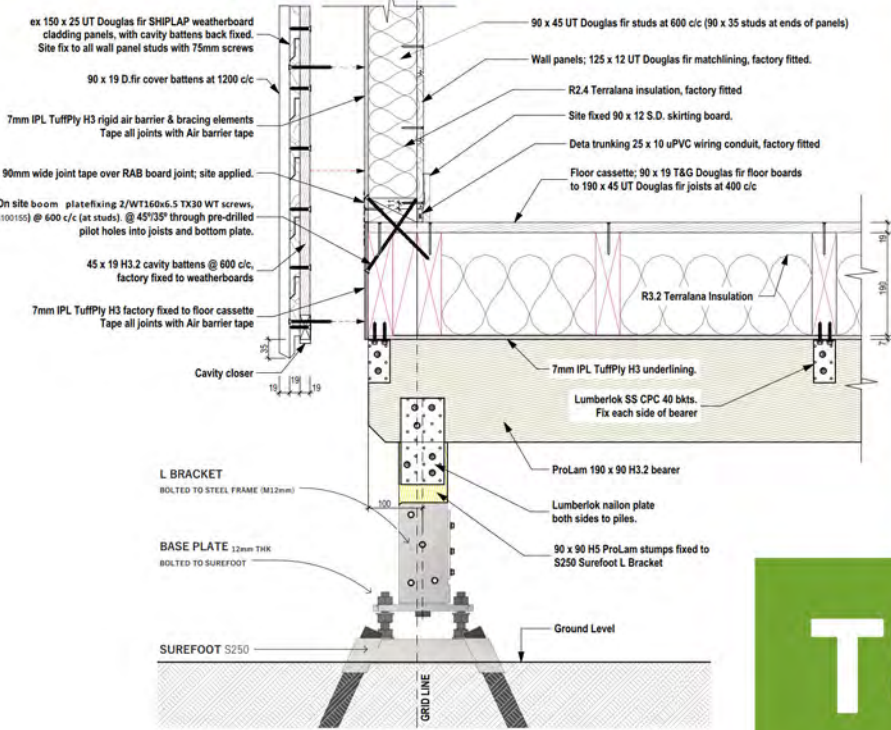
Wall Panel Joint



Roof / Wall Joint



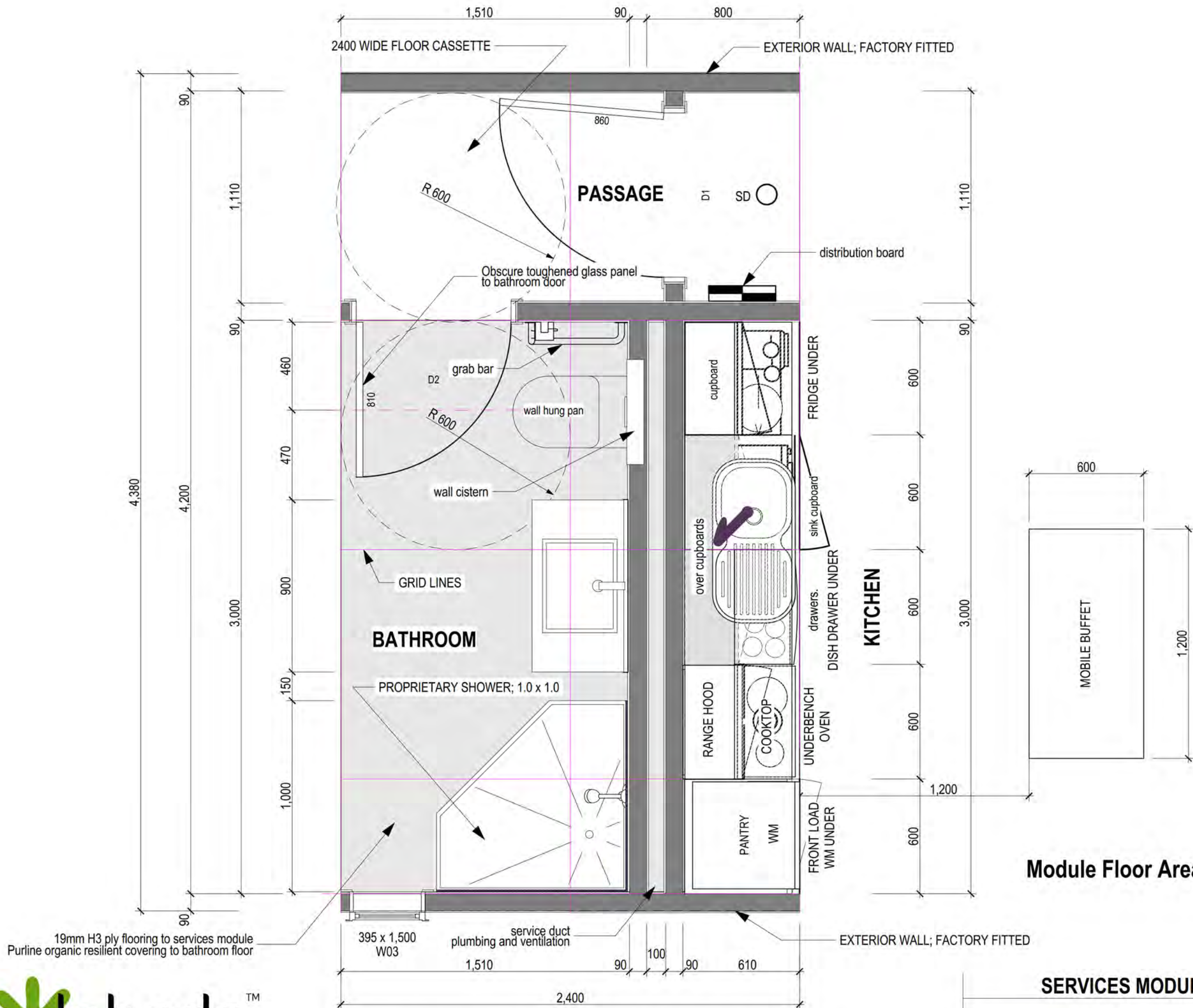
Floor / Wall Joint



Partner Suppliers



T8M2



Module Floor Area: 10.51 m²



PREFAB NZ SHUG DESIGN COMPETITION
SOLABODE MODULAR PREFAB SECONDARY MINOR DWELLING

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FLOOR PLAN DIMENSIONED	
Sheet	3 of
Model:	SERVICES MODULE

SERVICES MODULE FLOOR PLAN
 1:20

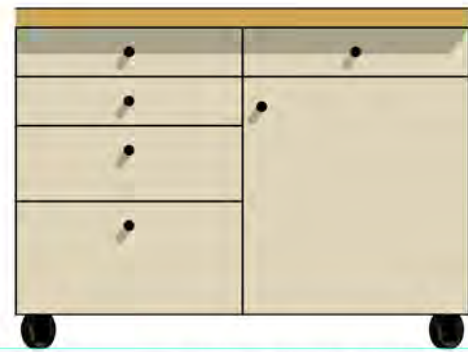


SERVICES MODULE KITCHEN PERSPECTIVE
1:1.421



SERVICES MODULE BATHROOM PERSPECTIVE
1:2.678

MOBILE KITCHEN COUNTER
1:20



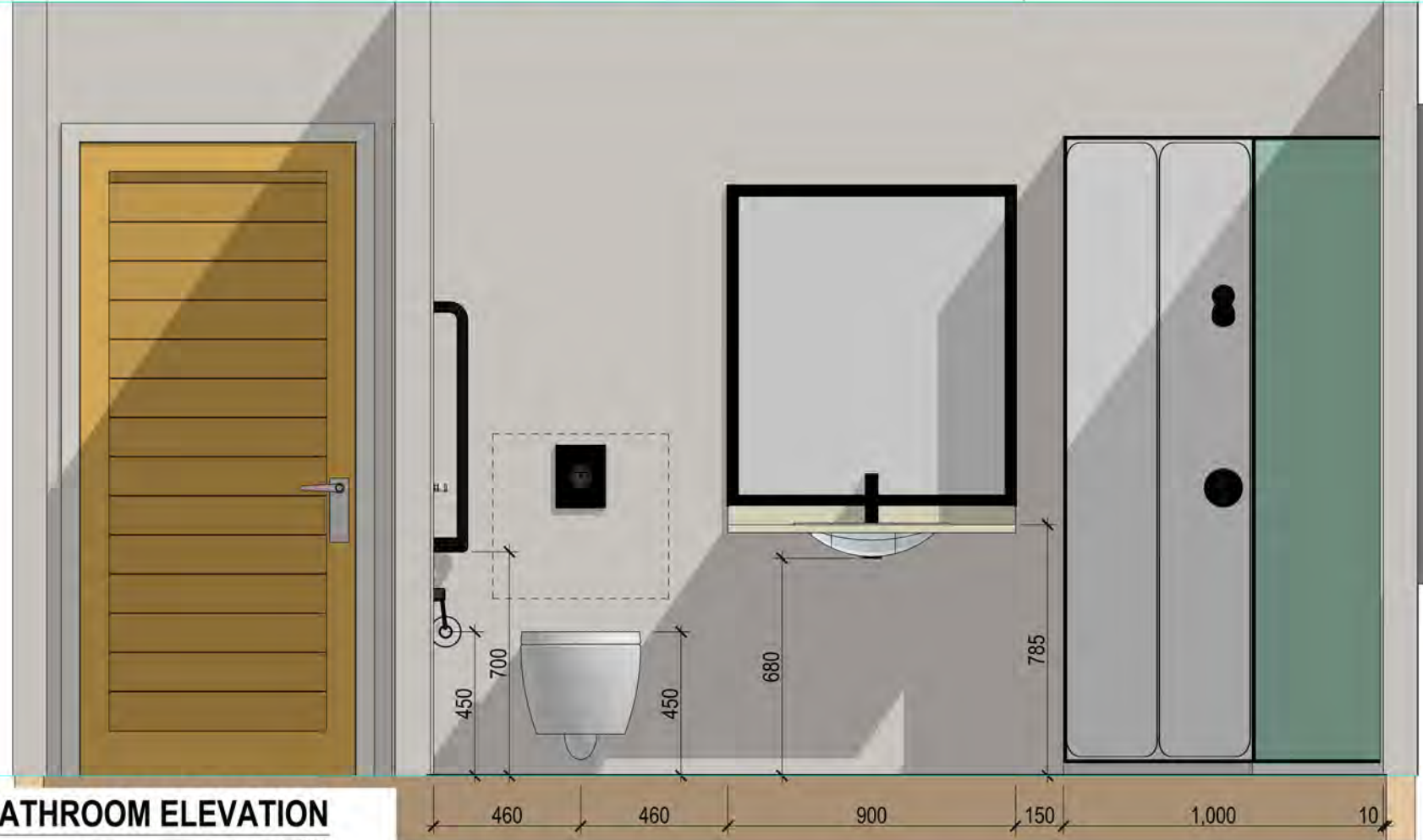
END ELEVATION
1:20



SERVICES MODULE KITCHEN ELEVATION
1:20



SERVICES MODULE BATHROOM ELEVATION
1:20



Secondary Minor Dwelling Example # 6

30m² 1 Bedroom Minor Dwelling

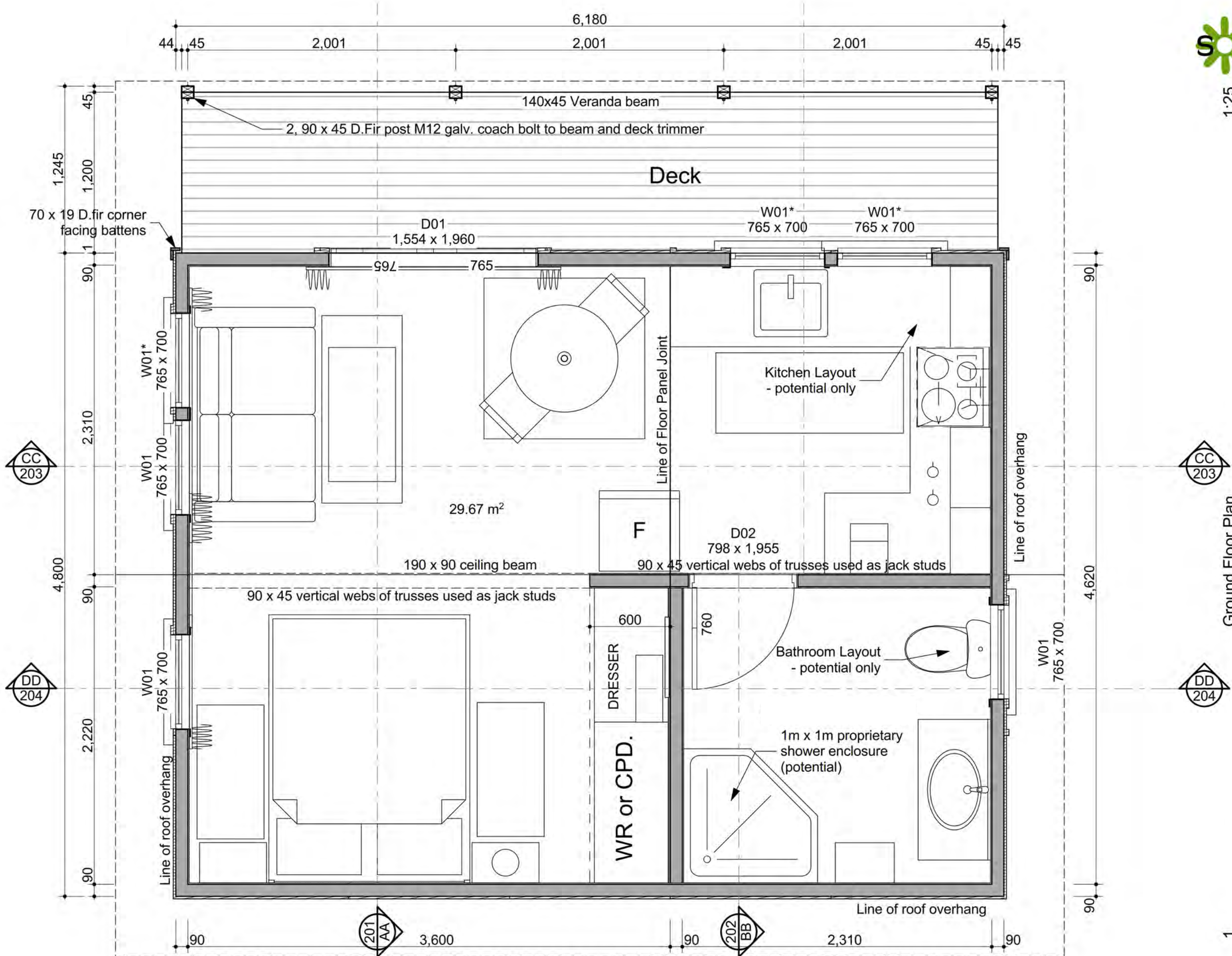


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NORTH PERSPECTIVE



Sheet Index	
Layout ID	Layout Name
101	3D Views
102	3D Views
103	Foundation/Floor Framing Plan
104	Floor Plan

Sheet Index	
Layout ID	Layout Name
105	Wall Panel Plan
106	Wall Panel Elevations
107	Bracing Plan
108	Roof Plan

Sheet Index	
Layout ID	Layout Name
109	Roof Framing Plan
201	Cross Section AA
202	Cross Section BB
203	Cross Section CC

Sheet Index	
Layout ID	Layout Name
204	Cross Section DD
301	Elevations
401	Floor Details
402	Floor Details

Sheet Index	
Layout ID	Layout Name
403	Roof Details
404	Roof Details
405	Roof Details
406	General Details

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www.ecotect.co.nz

PROPOSED SECONDARY MINOR

SHEET TITLE: 3D Views
REVISION #:
ISSUED: 21/02/2022
PROJECT #: 1904262



EAST PERSPECTIVE



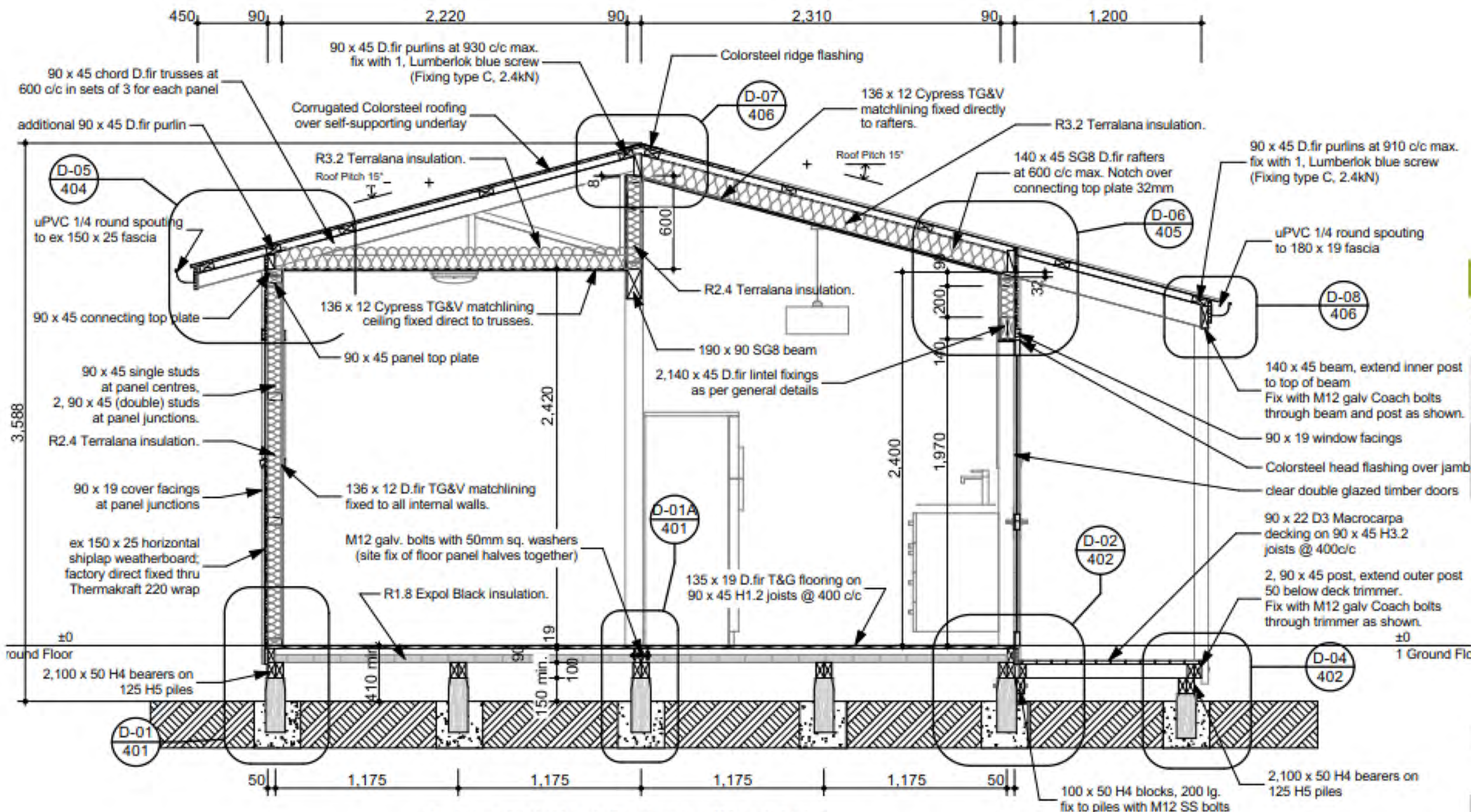
ECOTECT LTD
 163 Cleveland Tce. Nelson
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 CELL: 021 158 5024
 mark@ecotect.co.nz
 www.ecotect.co.nz

PROPOSED SECONDARY MINOR

SHEET TITLE:	3D Views
REVISION #:	
ISSUED:	21/02/2022
PROJECT #:	1904262

SHEET 102





The timber piles shall be cut off no closer than 150 mm to finished ground level provided the supported bearers are treated to H4.

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PROPOSED SECONDARY MINOR

SHEET TITLE:

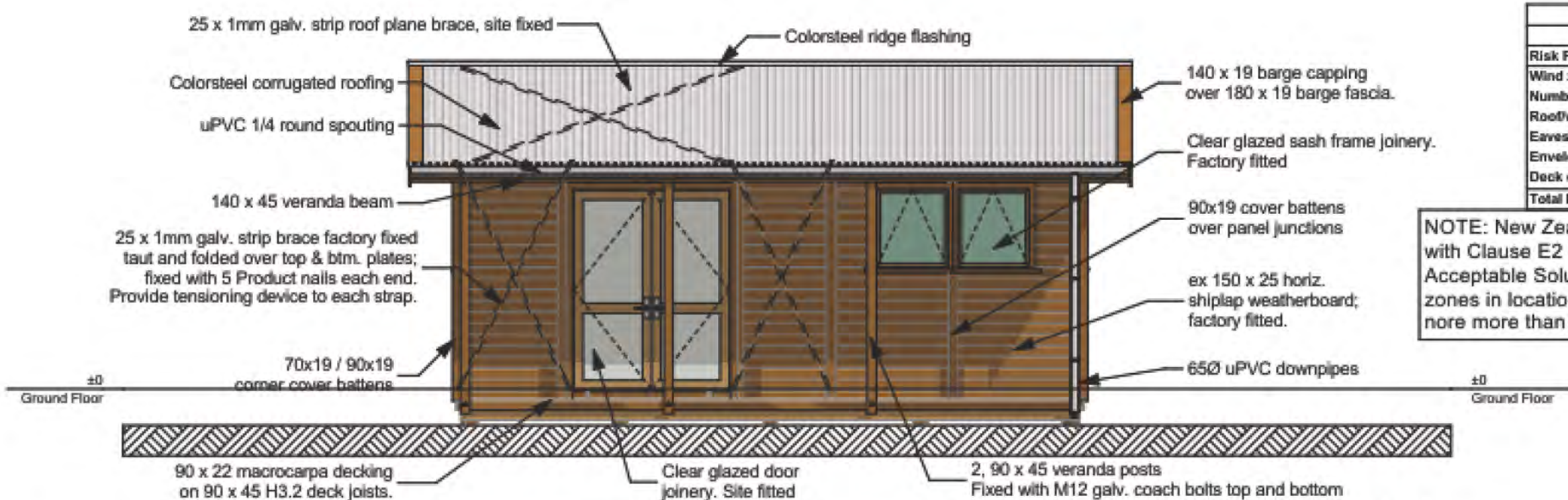
Cross Section AA

REVISION #:

ISSUED: 21/02/2022

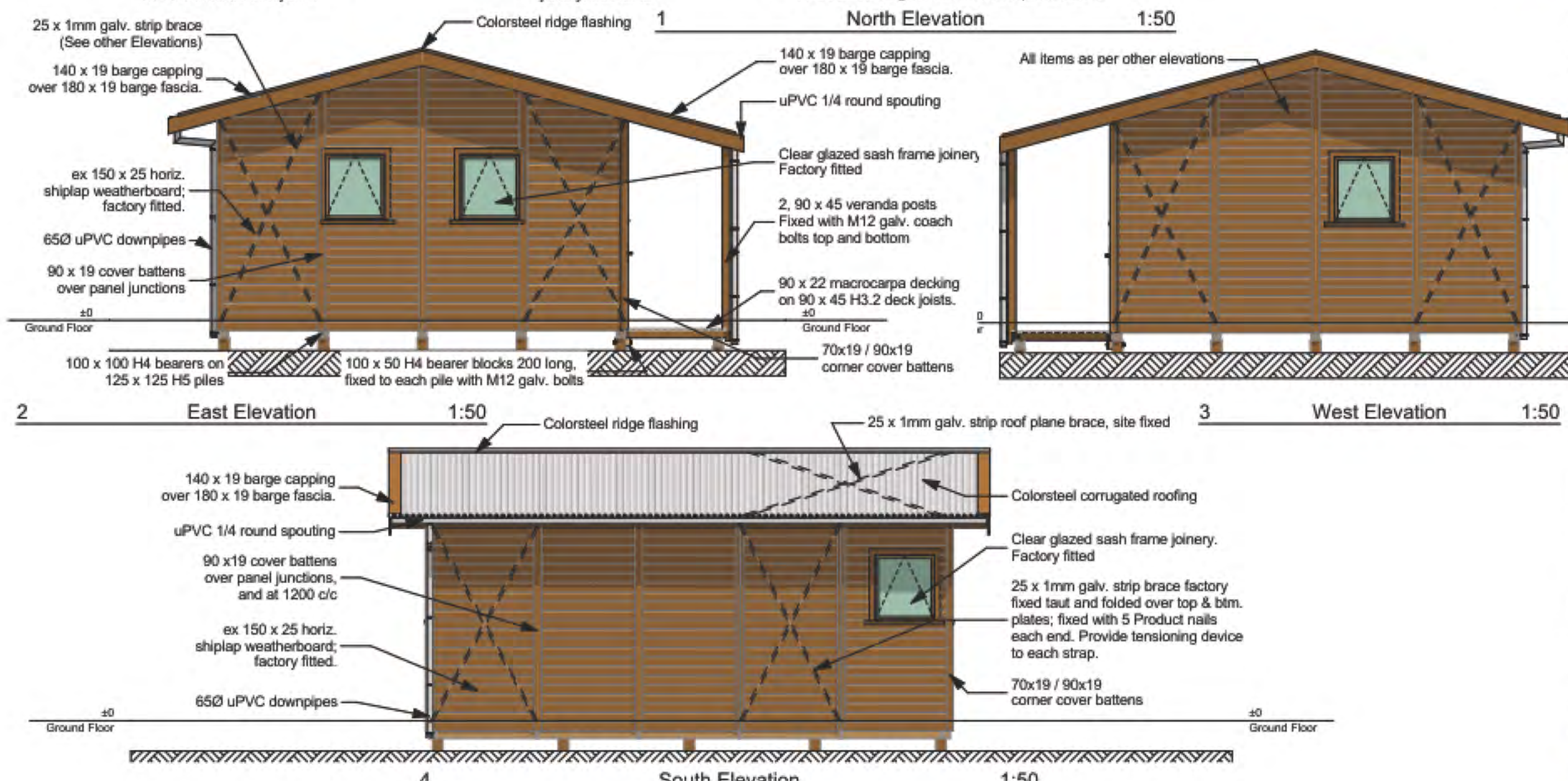
PROJECT #: 1904262

201



BUILDING ENVELOPE RISK MATRIX		
ALL Elevations		
Risk Factor	Risk Severity	Risk Score
Wind zone (per NZS 3604)	Very high risk	2
Number of storeys	Low risk	0
Roof/wall intersection design	Low risk	0
Eaves width	Medium risk	1
Envelope complexity	Low risk	0
Deck design	Low	0
Total Risk Score:		3

NOTE: New Zealand Building Code compliance with Clause E2 (Weathertightness) and Acceptable Solution: E2/AS1 is achievable if wind zones in locations where this cabin is sited, is more more than MEDIUM (IE: 37 m/s Max.)



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PROPOSED SECONDARY MINOR

SHEET TITLE:

Elevations

REVISION #:

ISSUED: 21/02/2022

PROJECT #: 1904262

301



APPENDIX #3

Secondary Minor Dwelling Built Example 42m² 1 Bedroom Removable Dwelling



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Deadline: 31/10/23 4pm to:

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

Marion Satherley

Phone:

Email: marionawayfromhome@gmail.com

Signature of Submitter:

Date:

I, along with Peter own a rental property on Suffolk Road in Stoke.

I **COULD NOT** obtain an advantage in trade competition through this submission. I **DO NOT WISH** to be heard in support of my submission.

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

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

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

2) Hearing Panel

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

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

3) NCC's Population forecasts

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

4) Design Lead and Not Developer Lead Growth.

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

5) Sunlight Recession Planes and Shading Effects

- a) Sunlight is a **CRITICAL** part of living in Nelson. It is not called the 'Sunshine Capital of NZ' for no reason. It is well documented that people relocate to Nelson because of the Sun and accept reduced wages called 'Sunshine Wages' for that privilege.
- b) TDC even 'Encourage the Sun into your home'. See <https://www.tasman.govt.nz/my-property/building-and-alteration/heating-and-insulation/energy-efficiency-and-heating-your-home/>
- c) All existing houses built prior to and under the current daylight admission rules will be subjected to the loss of sunlight amenity under PC29 with the following effects: -
 - i) Increased levels of mental health illness, anxiety and stress.
 - ii) Reduce the level of physical well being. It is a known fact that sunshine is a natural source of Vitamin D to build immunity. Without good levels of vitamin D the population will become sicker.
 - iii) Increased levels of damp homes with associated mould and mildew and respiratory illnesses.
 - iv) Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.

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

6) Privacy and Outlook

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

7) Intensification

- a) I strongly oppose the High-Density Residential Zone. It is by no way in character or in keeping with any existing 'Low Rise' Nelson residential suburb and beyond the MDS legal mandate.
 - i) I ask Council to remove HDRZ from the plan completely.
 - ii) I ask Council to apply the new General Residential Zone equally across the entire Nelson district on the introduction of PC29, on the basis that AP15 Daylight Admission protection rules will apply to all pre-existing properties, unless the owner gives written approval to the contrary.
- b) I am strongly opposed to all new 'Green Field' developments being used for only single storey dwellings as it is a complete underutilisation of land that can accommodate increased intensification.
 - i) I ask Council to ensure a maximum of two storey dwellings be built on all new green field developments. Eg Golden Elms in Toi Toi, Ngawhatu Valley and Marsden Valley.
- c) Building holiday apartments that sit empty for long periods, does not solve our intensification, growth and affordability dilemma, and yet it locks up our valuable housing resource. Eg Rocks & Haven Road has many empty apartments.
 - i) I ask Council to consider solutions to mitigate against new-build empty holiday apartments.
- d) I oppose the increase of residential units beyond 4, as a **restricted discretionary** activity that does NOT require notification and written approval from neighbours.

- i) I ask Council to ensure that more than 4 units requires notification, to restrict large 'out of character' accommodation blocks spanning multiple sections, and taking up lots of on street car parking spaces, popping up in a residential street, without warning.
- e) Bigger older properties, could be better utilised and help with our growth if they were more easily allowed to be divided into multi-dwellings.
- f) Building inner city apartments that offer an alternative solution to 'retirement villages', can free up the bigger homes for new families to occupy. The 'retired' occupants may also be less likely to be reliant on a vehicle, which may more closely suit the growth model desired.
- g) Designing Inner-City roof gardens and balconies with green spaces for commercial hospitality use or places for apartment living residents to relax and enjoy the Nelson Sun.
- h) Incentivise rate paying residents to demolish or relocate their house in favour of replacing more units on the same section providing they comply with the suitable character or heritage of the neighbourhood.

8) Progressively Phased Intensification

- a) Firstly, Inner City should be the starting place to have the most significant intensification, before forcing it onto the residential neighbourhoods, this can give more time to complete a better design vision for our residential neighbourhoods.
 - i) I ask Council to make better utilization of Car Only spaces, by developing them into shared spaces, with Accommodation overhead. 'Nelsust' highlights 44% of the Inner City as Car only spaces.
 - ii) I ask Council to retain para ICd.11 'The zone enables and encourages an increase in the density and diversity of quality housing in the City Centre by enabling residential activity above ground floor level. It is expected that over time, more people will choose to live in the City Centre because of its easy access to offices, shops, entertainment and varied open spaces and experiences'.
- b) Secondly, City Fringe would be the next zone to phase in for intensification.
 - i) I ask Council to negotiate and/or incentivise Industry and car yards to relocate, to less essential land that can be better used for accommodation.
- c) Finally, the Residential Zones would be the last area to be phased in, by working out from the City Fringe Zone (and Central Stoke).
 - i) I would support Medium Density Residential Zones (3 storey 11m high) progressively expanding from the CBD (and Central Stoke) **if required and over time**, providing AP15 Daylight Admission Protection rules remain in force for existing properties.

9) Intensification in hazard zones

- a) I ask Council to apply no greater than General Residential Zoning rules in all Hazard overlays, because these areas have been assessed as vulnerable.

b)

10) On-street carparking

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

11) Social Housing

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

12) Infrastructure

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

To:

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

Submitter:

Full Name: Leonie Allen

Address:

Telephone:

Email: info@parkergallery.nz

Signature of Submitter:



Date: 21/10/2023

Delete as applicable: -

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...

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- (2) I strongly support the inclusion of Daylight and Sunlight policy statement Para RE2.3.i: The reception of daylight and sunlight to each household unit is a critical component of residential amenity that provides warmth and energy efficiency, and is vital for outdoor activities such as gardening and recreation. To ensure shading effects are minimised, and to ensure there is sufficient space around buildings to allow the admission of daylight to the site, this Plan has provided for daylight controls on all side and rear boundaries. The policy also applies to larger non-residential buildings such as schools or halls. The basic premise is that the daylight and sunlight received on a residential site should be no different whether or not the neighbour is residential. This philosophy applies whether the building is on an adjoining site or across a street.

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- a) I strongly oppose the High-Density Residential Zone. It is by no way in character or in keeping with any existing 'Low Rise' Nelson residential suburb and beyond the MDS legal mandate.
 - i) I ask Council to remove HDRZ from the plan completely.
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RMA Submission Form for Publicly Notified Plan Change 29



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

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

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

*Required

Submitter Details

Full Name*	Andrew Herbert & Carol Ward		
Organisation			
Contact Person	Andy Herbert		
Postal address*			
Telephone*		Email*	andy.herbert@xtra.co.nz

OFFICE USE

Submission No: S347

Date Received Stamp:

24/10/2023

NDOCs No: 539570224-16513

Trade Competition*

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

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

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

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

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

Council Hearing*

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

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

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

Public information

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

Andrew Herbert

15th October 2023

Signature of Submitter*

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

Date*

RMA Submission Form for Publicly Notified Plan Change 29

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

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

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

My submission is*:

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

We oppose Plan Change 29 in its entirety.

If the plan change continues in its current or an amended form, these are the issues that we are most concerned about:

1. We do not believe that the effects of this plan change on the natural environment have been adequately considered or addressed. Intensification in land use, including intensification for residential purposes, inevitably places a greater stress on the natural environment. We do not believe that other than for transport emissions, the impact of this proposed plan change on the natural environment has been adequately assessed. We note that council's Section 32 Evaluation Report contains only seven uses of the term "natural environment" in its 297 pages (compared with 160 references to either "urban environment" or "built environment").
2. We do not accept that the assessment of housing development needs in response to future changes such as increases to population, are based on sound information (e.g. demographics, etc) or analysis. Council's evaluation documents (e.g. Housing & Business Capacity Assessment Report 2021) identify a considerable range in possible scenarios for population growth: the rationale for choosing a basis on which to build such a significant change to planning allowances such as Plan 29 is not well justified. Even with the assumptions made within the assessment there are considerable contradictions: the Report 2021 (noted above) describes population growth to 2051 of 11,900 people, a development need of 8,000 dwellings with an occupancy of 2.3 persons per dwelling. Even if the population growth is a correct assessment, this maths does not add up.
3. The effect of the proposed Plan 29 on the residential character and heritage environment of Nelson city will be extreme and we consider to be an unacceptable change. We refer to heritage character in a general sense (not specifically heritage precincts or properties). The proposed increase in permitted building heights in the High Density and Medium Density zones identified in the plan are the more egregious examples of how the character of the city's residential area would be changed by the allowances in this plan. To be a Smart Little City, Nelson must retain the attractiveness of the current built environment. Placing three or six storey buildings within neighbourhoods that are currently predominantly single or two storey

homes will destroy the character. Skilled, adventurous, progressive people will not want to live in such environments.

4. The specific effect of three or six storey buildings on daylight admission to adjacent properties will be extreme. This change will directly negatively affect the property values of any property where impingement of daylight or aspect (views) are affected. The values of all properties where there is a risk of such development may be negatively affected. We believe this is an unreasonable outcome/risk created by this plan change.
5. We are not opposed to intensification per se as a solution to growing housing demand. We do however believe that parking in the residential areas of Nelson is already at capacity and any housing intensification must not shift more parking demand onto the city streets. Street parking already creates safety hazards for at-risk residents, particularly children, the elderly, and those with visual handicaps. These hazards should not be allowed to be increased by any plan change.

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I seek the following decision from the Council*:

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

1. A comprehensive assessment of the impact of Plan Change 29 on the natural environment.
2. Reassess the underlying assumptions about growth in demand for housing in Nelson with critical input / review by external experts in the field of demographics and related areas.
3. Decision by council to instruct that planning better manage the residential character of Nelson and not permit excessively tall buildings be permitted in residential areas.
4. Include the management of vehicle parking so that if house intensification occurs within any plan change process, parking on public roads is not increased.

Note:

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

Online submission

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

Submitter No.	S348
Submitter Name	Rodney Lewis
Submitter first name	Rodney
Submitter middle name	Alexander Paul
Submitter surname	Lewis
Submitter is contact	Yes
Email	roketrod@mac.com
Wish to be heard	Yes
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	My reasons are comprehensively spelled out in my submission. But generally, I oppose any intensification that needs major changes to building sizes, site coverage, or changes to daylight provision requirements.	I want the plan change to be sent back to the planners and then they should seek public input and take notice of objections before formulating any change.

Documents included with submission

Document name	PC29 Submission
File	pc29submission.pdf
Description	Personal submission - 8 pages

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

Full Name: Rodney Alexander Paul LEWIS

Address:

Telephone:

Email: roketrod@mac.com

Signature of Submitter:



Date: 24th October 2023

Plan Change 29

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

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

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

1) The Plan Change 29 Process. I want it acknowledged :

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

stressful and unnecessary.

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

2) Hearing Panel

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

3) NCC’s Population forecasts

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

4) Design Lead and Not Developer Lead Growth.

- a) Nelson is a very special and unique place that needs to be protected with care. It is unlike any other district in NZ. It includes a ‘Low Rise’ City with a collection of heritage and non-heritage character buildings that have attracted people for generations and been a cherished holiday

destination for many New Zealanders.

- b) Residential Neighbourhoods should be protected for future generations to enjoy and new developments thoughtfully designed and planned on a neighbourhood, by neighbourhood basis to maintain the essence of their character.
- c) We need to protect and retain CBD historic facades as an essential part of the character of the Inner City.
- d) Contemporary Black Iron Clad Boxes, built only a few metres from 120-year-old Historic Homes is a thoughtless lack of long-term vision for maintaining the attraction of Nelson for all the future residents and visitors.
- e) Green Spaces, Trees and Landscaping are essential for the look and feel of some of our older neighbourhoods. They help considerably with the wellbeing of the residents and help to provide an essential part of the attraction of Nelson, which must all be considered during developing the growth of Nelson.
 - i) I ask the Council to create a broader level of protection for neighbourhoods beyond the heritage buildings and precincts that still have historic character value from the early settlement years of Nelson.
 - ii) I ask the Council to appoint an Urban Development Agency (UDA) to carefully guide growth and actively facilitate the emergence of cohesive urban neighbourhoods with a variety of high-quality housing choices.
- **5) Sunlight Recession Planes and Shading Effects**
 - a) Sunlight is a **CRITICAL** part of living in Nelson. It is not called the 'Sunshine Capital of NZ' for no reason. It is well documented that people relocate to Nelson because of the Sun and accept reduced wages called 'Sunshine Wages' for that privilege.

- b) TDC even 'Encourage the Sun into your home'. See <https://www.tasman.govt.nz/my-property/building-and-alteration/heating-and-insulation/energy-efficiency-and-heating-your-home/>
- c) All existing houses built prior to and under the current daylight admission rules will be subjected to the loss of sunlight amenity under PC29 with the following effects: -
 - i) Increased levels of mental health illness, anxiety and stress.
 - ii) Increased levels of damp homes with associated mould and mildew and respiratory illnesses.
 - iii) Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.
 - iv) Increased heating costs, air pollution, carbon foot print, are all exasperated due to a large portion of Nelson housing is old, with un-insulated walls and single glazing and open fires were legislated out of use many years ago.
 - v) Reduction in property values and increased financial stress, because the house would be less desirable to live in.
 - vi) Residents, struggling with the cost-of-living crisis may not afford to heat their home.
 - vii) Property owners will be reluctant to invest in making additional new (low rise) infill improvements on their section, with affordable additional units that **COULD** be 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.

6) Privacy and Outlook

Privacy is a critical part of enjoying a property.

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 residenKal units to be orientated towards the street or public open space'.

7) Intensification

- a) I strongly oppose the High-Density Residential Zone. It is by no way in character or in keeping with any existing 'Low Rise' Nelson residential suburb and beyond the MDS legal mandate.
 - i) I ask Council to remove HDRZ from the plan completely.
 - ii) I ask Council to apply the new General Residential Zone equally across the entire Nelson district on the introduction of PC29, on the basis that AP15 Daylight Admission protection rules will apply to all pre-existing properties, unless the owner gives written approval to the contrary.
- b) I am strongly opposed to all new 'Green Field' developments being used for only single storey dwellings as it is a complete underutilisation of land that can accommodate increased intensification.

i) I ask Council to ensure a minimum of two storey dwellings be built on all new green field developments. Eg Golden Elms in Toi Toi, Ngawhatu Valley and Marsden Valley. c) Building holiday apartments that sit empty for long periods, does not solve our intensification, growth and affordability dilemma, and yet it locks up our valuable housing resource. Eg Rocks & Haven Road has many empty apartments.

i) I ask Council to consider solutions to mitigate against new-build empty holiday apartments.

d) I oppose the increase of residential units beyond 4, as a **restricted discretionary** activity that does **NOT** require notification and written approval from neighbours.

i) I ask Council to ensure that more than 4 units requires notification, to restrict

large 'out of character' accommodation blocks spanning multiple sections, and taking up lots of on street car parking spaces, popping up in a residential street, without warning.

- e) Bigger older properties, could be better utilised and help with our growth if they were more easily allowed to be divided into multi-dwellings.
- f) Building inner city apartments that offer an alternative solution to 'retirement villages', can free up the bigger homes for new families to occupy. The 'retired' occupants may also be less likely to be reliant on a vehicle, which may more closely suit the growth model desired.
- g) Designing Inner-City roof gardens and balconies with green spaces for commercial hospitality use or places for apartment living residents to relax and enjoy the Nelson Sun.
- h) Incentivise rate paying residents to demolish or relocate their house in favour of replacing more units on the same section providing they comply with the suitable character or heritage of the neighbourhood.

8) Progressively Phased Intensification

a) Firstly, Inner City should be the starting place to have the most significant intensification, before forcing it onto the residential neighbourhoods, this can give more time to complete a better design vision for our residential neighbourhoods.

- i) I ask Council to make better utilization of Car Only spaces, by developing them into shared spaces, with Accommodation overhead 'Nelsust' highlights 44% of the Inner City as Car only spaces.
 - ii) I ask Council to retain para ICd.11 'The zone enables and encourages an increase in the density and diversity of quality housing in the City Centre by enabling residential activity above ground floor level. It is expected that over time, more people will choose to live in the City Centre because of its easy access to offices, shops, entertainment and varied open spaces and experiences'.
- b) Secondly, City Fringe would be the next zone to phase in for intensification.

i) I ask Council to negotiate and/or incentivise Industry and car yards to relocate, to less essential land that can be better used for accommodation.

c) Finally, the Residential Zones would be the last area to be phased in, by working out from the City Fringe Zone (and Central Stoke).

i) I would support Medium Density Residential Zones (3 storey 11m high) progressively expanding from the CBD (and Central Stoke) ***if required and over time***, providing AP15 Daylight Admission Protection rules remain in force for existing properties.

9) Intensification in hazard zones

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

10) On-street carparking

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

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

11) Social Housing

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

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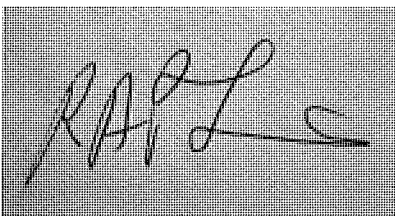
c) High density living for the homeless and vulnerable will not result in healthy outcomes for all concerned.

Careful design controls from the concept stage onwards, will be rewarded in the long run, with less support required by Mental Health Services, Charity Services, Police and Social Services.

- i) I would like to see Council working closely with Kainga Ora, to provide a 'transparent' way of creating new Social Housing Developments that 'Fit' with the long-term design vision of Nelson.
- ii) I would like to see Council have more fit for purpose controls for antisocial behaviour that affects the existing neighbour's enjoyment of their property.

12) Infrastructure

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

A handwritten signature in black ink, appearing to read 'R. A. L. C.', is written on a textured, grey background.

24th October 2023

Online submission

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

Submitter No.	S349
Submitter Name	Sean Walker
Submitter first name	Sean
Submitter middle name	Robert
Submitter surname	Walker
Submitter is contact	Yes
Email	seanwalkerdesign@xtra.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
Entire Plan Change	General support	Oppose in part	While I am in support of urban intensification in n I feel that the plan change in its current form lacks detail and vision. A change of this substance will best be developed with the new NBE Act and address all areas of the environment both social and physical. Many people have commented that they live in Nelson for the sunshine. There isn't enough assurance that this has been considered. A high density zone should include open spaces and sun corridors to ensure its livability, or become an urban jungle. I would like to see urban development in Nelson address climate changes more positively and include dedicated sponge zones, urban forests and green roof initiatives. High density residential should be led from the inner city zone where effects are less subjective. The proposed plan change would permit anyone with a large enough parcel to build to 19m with little or no guidance on amenity values and aesthetics. I think that a change allowing multiple residential units per title and up to 10m high would be an improvement. Some sunlight controls to ensure the effects of shading are not extreme. Yard setbacks should be done away with and an outdoor living requirement allowing for decks with orientation to the best sun and views. Encourage developers to provide landscaped areas for community use to mitigate higher building height. A sense of community values needs to be brought back into the design brief. Historic areas require more certainty around protection or they will be allowed to deteriorate losing historic values with them.	I do want to see a new high density zone developed within walking distanc of the city center.

Received: 24/10/23
Sub No: 5350
NDocs: 539570224-16575

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

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

Environmental.planning@ncc.govt.nz

Submitter (Complete details below):

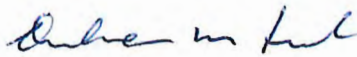
Full Name: Andrew Martin Lush

Address:

Telephone:

Email: amlush@actrix.gen.nz

Signature of Submitter:



Date: 23rd October 2023

Delete as applicable: -

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

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

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

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

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

6) Privacy and Outlook

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

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