

# Online submission

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

|                           |                                                                             |
|---------------------------|-----------------------------------------------------------------------------|
| Submitter No.             | S351                                                                        |
| Submitter Name            | Sam Mellor                                                                  |
| Submitter first name      | Sam                                                                         |
| Submitter middle name     | Christopher                                                                 |
| Submitter surname         | Mellor                                                                      |
| Submitter is contact      | Yes                                                                         |
| Email                     | <a href="mailto:sam.mellor@live.co.uk">sam.mellor@live.co.uk</a>            |
| Wish to be heard          | Yes                                                                         |
| Joint presentation        | Yes                                                                         |
| Trade competition         | I could not gain an advantage in trade competition through this submission. |
| Directly affected         | N/A                                                                         |
| Withhold contact details? | No                                                                          |

## Submission points

| Plan section | Provision         | Support/oppose | Reasons | Decision sought                                                                                                                                                                                                                                                                              |
|--------------|-------------------|----------------|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Heritage     | Heritage schedule | Oppose         |         | Former Bishop's Residence at 225 Waimea Road be removed from Appendix 1 Heritage Buildings. (Unconditional rejection of recommendation to "include the building (Former Bishop's Residence) at 225 Waimea Road as a protected heritage item in the Nelson Resource Management Plan (NRMP)"). |

Set out below are the key reasons why we seek an unconditional rejection of the proposed heritage listing of our property:

1. Significant alterations have already been made and approved by heritage New Zealand and NCC

We have just completed a complete renovation of the house including adding to the original floorplate, energy efficiency measures such as fully insulating the house and double glazing the windows, adding a central heating system, adding a basketball court, home gym, cinema room, wine cellar and laundry / utility room. Prior to our purchase, the nature of the house and surrounding areas had been fundamentally altered since the 1925 version the heritage recommendation is trying to preserve – namely enclosure of previously outdoor verandas and loggias, insertion of a swimming pool and conversion of old garage into a pool house.

Essentially, the nature of the property has been so fundamentally altered that it no longer represents the “way of life of the Anglican Diocese of Nelson’s bishops between 1925 and the late 1990s”.

2. Examples of cited heritage construction methods and materials items no longer exist

As part of previous alterations consented to by NCC the coke insulation has been largely removed and replaced with modern fit for purpose (and fire safe) insulation, the corrugated iron roofing was replaced in 1985 and we estimate that less than 50% of the recycled wood referred to is still in situ in the house. The reason given for heritage status simply no longer exist.

3. Existing heritage status of church, specific trees and woodland area sufficient protection

As we have experienced through the above renovation approval process, the existing heritage status of the church and the 14 listed trees provides a significant protection to the house property. It was extremely difficult and took us many bruising years and significant expense to gain approval. No further heritage protection is required.

4. Heritage designation will disincentivise future investment in the property and affect

future value

We have spent a significant amount of money on upgrading the building and grounds and have been extremely good custodians of the property during our ownership. Previous ownership did not have the funds to maintain the grounds or property and it ended up in mortgagee sale. Had the building had heritage status, we would not have bought it as we would not have had the confidence to invest the significant sums of money we have to restore the property and grounds. No consideration has been given to the costs or opportunity costs to the owners as required by case law (Colonial Vineyards) and this has not been taken into account in anyway in the recommendation. The quote below from the Australian Productivity Commission report of 2006 sums the situation here – NCC is looking to us for a free lunch:

"As a consequence, the current heritage system essentially requires property owners to provide, without payment, community-demanded heritage conservation services. This approach entrenches divergences between the incentives faced by owners and the community, and introduces incentives to list and conserve historic heritage places where the benefits are less than the costs of conservation. It also provides an incentive for listing agencies to continue to press for further conservation effort until there are few more benefits to be had – irrespective of the costs involved. Without the discipline imposed by having to pay the costs of heritage conservation, there may be over-provision of the heritage public good, or of particular types of heritage places, resulting in a net cost to the community as a whole, rather than a net benefit."

5. Proposed designation includes modern buildings built after 2010

As proposed, the heritage designation would include the 3 villas in the ground that are of completely modern construction and have no heritage value having been constructed in recent years. This is nonsensical.

6. Proposed designation of whole property (including land) is an over-reach

There is zero justification for marking the

whole land area upon which the building sits as heritage restricted and this shows the desk top nature and underwhelming detail of the work done in preparing the recommendation. Why should lawns, carparks and driveways be heritage items?

7. No public benefit

The general amenity value of the building is limited. It is not visible from the road and the public cannot access it. What public use is being provided by imposing heritage restrictions?

8. Proposed designation negatively impacts business which has key role in Nelson tourism eco-system

We have – at considerable cost - established a successful luxury accommodation business on the property that is essential to the maintenance of the whole site and buildings (including the house and the church) by providing a source of revenue with which to cover the significant annual running costs of the property (rates, insurance, utilities, garden & heritage tree maintenance) as well as invest in maintaining the buildings themselves. A heritage listing of the property will make the running of such business significantly harder due to the extra overlay it will bring to any consents required. As it is, NCC have been extremely laborious to deal with in regards to any approvals required for the business which is surprising given the key role it has in both providing employment and one of only a handful (reducing by the day) of luxury properties in the region that are essential for attracting HNW and UHNW tourists from Europe and North America. These tourists are exactly what the region needs – light touch and high value who spend significant amounts of money when visiting the region (private boat charters, private guided tours, private helicopter flights, eating out at Nelson's best restaurants nightly). We have been directly advised by the key travel agents in Auckland who handle these customers that the absence of a luxury accommodation property such as we are running will mean they no longer put the region on the itinerary of these tourists. This will have a hugely detrimental affect on multiple businesses in the region and will affect employment prospects for many people.

#### 9. Inconsistency of heritage recommendations

The neighbouring property contains the well known and culturally significant "old pottery" and yet no heritage listing has been proposed there. This to us shows an inconsistency of approach between landowners which we would welcome an explanation from NCC.

10. Proposed designation based off a desk top analysis by an out of region (North Island) consultant with no site visit or detailed research and the bishops residence has been in existence since the 1860s (1925 in its current form) and has never been considered for heritage status before – so why now?

As detailed above, the building has changed significantly from the version described in the recommendation and despite having almost 100yrs to do so has never been considered for heritage status previously. Clearly a conscious decisions was made to exclude it at the time that the trees and church were granted such status. The lack of a request to visit the site and view the substantial changes made since 2000 is indicative of a broad brush and cursory analysis from an out of region desk top researcher.

#### 11. Inadequate consultation

The council was provided with this recommendation in August 2021 but has sat on it for almost 2yrs before presenting it to owners. Why such a long delay in providing this information? This does not provide confidence in the process.

#### 12. Suggested Archaeological Significance

As part of the 2022-2023 renovation approval conditions, extensive archaeological investigation was completed and nothing of any historical significance found. Therefore this ground for the recommendation is not supported.

**The Nelson City Council wants your opinion. Please tell us what you think.**

**Please type or print clearly. Remember to read the submission writing guidelines (over) before starting.**

**Name:** Derek Edward Austin & Karen Jane Austin

**Daytime phone** \_\_

**Address** \_

**Organisation represented (if applicable)**

**Do you wish to be heard in support of your submission?** ☐ YES ☐ NO **# of pages** \_\_\_\_\_ *If you do not tick a box we will assume you do not wish to be heard.*

**Public information**

*Submissions to Council consultation are public information. Your submission will be included in reports, which are available to the public and the media.*

**The consultation/proposal my submission relates to:**

Plan Change 29

**Our submissions are:**

**We oppose all parts of the Plan Change that deal with "Residential."**

*We seek that NCC considers the value of protecting residential areas. We would support it if HD7 became MD2; and MD2 became GR2.*

**We oppose Section D or Section C regarding the maximum height of buildings being between 11 and 19.5 metres.**

*We seek that NCC remove Section C and Section D so that the height of buildings does not exceed 11 metres in residential areas.*

*We support a height of up to 19 metres in the Inner City.*

*In regard to Fringe we support something between 11 -19 metres.*

**We oppose NCC's Plan Change 29 because it permits developers "As of Right" to build Medium Density Zone and High Density Zone in residential areas. The reasons are because of the extreme loss of amenities such as sunlight, privacy and views.**

*We seek that NCC remove the developers' "As of Right" clause to build Medium Density Zone and High Density Zone in residential areas.*

**We oppose the HDZ because the conditions lack logic for Nile, Trafalgar, Examiner and Rutherford blocks.**

*We seek that the HDZ be removed from the Nile, Trafalgar, Examiner and Rutherford proposed Blocks.*

| Office Use Only |                    |                           |    |
|-----------------|--------------------|---------------------------|----|
| 24/10/23        |                    | Submission Number<br>5352 |    |
| File Ref        | 59570224<br>-16516 | INITIALS                  | AD |

We oppose the omission of any requirement to provide carparks in proposed developments.

*We seek that NCC creates legislation to ensure that at least one carpark must be provided for each residential unit. Currently, residential streets near the inner city are used for free parking from Mondays to Fridays.*

We oppose the proposed recession angles.

*We seek that the recession angles be 50-55 degrees.*

*We seek that the height of recession angles start at 3 metres.*

We oppose that the Nelson City Council is able to sell property to Kainga Ora for Social Housing and not have the legal right to be able to carefully plan the location of social housing around the city. Social Housing needs to be planned by the NCC so that ghetto areas do not develop.

*We seek that the Nelson City Council regard it as a priority to have responsible governance around the development of Social Housing Planning. We favour the "pepperpot" approach to social housing so that Kainga Ora tenants have stable community support.*

Date 21 October, 2023

Signature Derek E. Austin Karen J. Austin



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

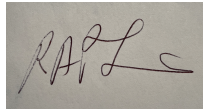
**Full Name: Rodney Alexander Paul LEWIS**

**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 14<sup>th</sup> September Council meeting.
- i) I ask the Council to appoint Councillors from either side of the Sept 14<sup>th</sup> 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 residential units to be orientated towards the street or public open space'.

## 7) Intensification

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

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

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

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

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

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

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

## **8) Progressively Phased Intensification**

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

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

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

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

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

## **9) Intensification in hazard zones**

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

## **10) On-street carparking**

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

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

## **11) Social Housing**

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

b) 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.

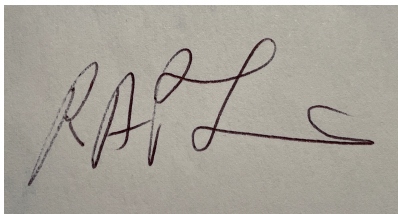
c) High density living for the homeless and vulnerable will not result in healthy outcomes for all concerned.

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.



**24th October 2023**

Received: 24/10/23  
Sub No: 5354  
Docs: 339570224-  
15623

## SUBMISSION RELATING TO PLAN CHANGE 29

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

**Submitter:**

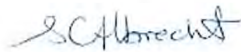
**Full Name:** Sally Catherine Albrecht

**Address:**

**Telephone:**

**Email:** sally\_albrecht@hotmail.com

**Signature of Submitter:**



**Date:** 24/10/23

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...

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

- a) That I have found it difficult to digest the total effect of the proposed PC 29 and its supporting documentation due to its size and complexity.
- b) That I have found PC 29 lack of early public engagement and consultation by Council, with its severe implications towards the well-being of existing rate paying residents enjoyment of their properties, extremely stressful and unnecessary.
- c) That the "neighbourhood meetings" belatedly set up by NCC failed to address or answer any neighborhood specific questions but were rather only for disseminating "high level information" from the Plan Change. These meetings have in no way met the requirement for neighborhood consultation

2) 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 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.

### 3) 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. 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.
- e. With increased density housing and possibly apartment living, increased community green spaces/outdoor lounges are essential
  - **I ask the Council to create a broader level of protection for existing properties and their amenity value beyond the heritage buildings and precincts**
  - **I ask that Council include protection of current green spaces AND create a plan for the provision of additional shared green spaces in all/any increased density zones**
  - **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.**

### 4) Sunlight Recession Planes and Shading Effects

- a. Sunlight is a **CRITICAL** part of living in Nelson, particularly for older homes which rely heavily on sunlight for heating. 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 potentially 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
  - 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.

- 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.
- 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.

#### 5) Privacy and Outlook

- a. 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 residential units to be orientated towards the street or public open space'.

#### 6) Intensification

- a. I strongly oppose the High-Density and Medium Density Residential Zones. 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 ask Council to remove HDRZ and MDRZ from the plan completely.
  - 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 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 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 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.**

#### 7) 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 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.**
  - **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 ask Council to negotiate and/or incentivise Industry and car yards to relocate, to less essential land so that prime real estate 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 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.**

8) Intensification in hazard zones

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

9) On-street carparking

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

10) Social Housing

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

11) Infrastructure

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

## SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29

Received: 12/10/23  
 Sub No: S355  
 Does: S39570224-  
 16534

|                                                                                                                  |                                                                                                                            |
|------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| To:<br>Senior Planning Administrator<br>RMA Plan Submissions<br>Nelson City Council<br>PO Box 645<br>Nelson 7040 | Submitter:<br>Full Name: <b>Bernard Paul Penketh</b><br>Address:<br><br>Telephone:<br>Email: <b>bernardp@hotmail.co.nz</b> |
|------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|

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

**I OPPOSE** the Plan Change; and particularly the following

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

**I SEEK** the following decision from the Council

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

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

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

Other comments or concerns I have about Plan Change 29

The possibility of a 19.5m tall "Kaiinga Ora" building going up in Neale Avenue would in my opinion be bad news for Stoke and its people.  
 If this plan goes ahead I could potentially have a 12m high residence on the property to the north of me, all my sun and views gone. Cars would be parked out on an already narrow road. Cause for concern with drivers having to drive a one lane avenue when cars are parked on both sides of the road. These proposed homes need garages.

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

I agree with local architects, remove uncoordinated site by site developments, have good design which blends in. The proposals would allow for 6 story buildings in some areas. Four stories should be maximum, for Stoke 3 stories max. Allow for tiny homes on properties for granny type accommodation, providing they don't infringe on a neighbours daylight etc

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

**Bernard Penketh**

Submitter

**12/10/2023**

Date

**NB: TO BE DELIVERED TO NCC OR SENT TO [environmental.planning@ncc.govt.nz](mailto:environmental.planning@ncc.govt.nz) by 4.00 pm**

**Tuesday 19th September**

**31 October 2023**

# Online submission

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

|                           |                                                                             |
|---------------------------|-----------------------------------------------------------------------------|
| Submitter No.             | S356                                                                        |
| Submitter Name            | Sarah Yarrow                                                                |
| Submitter first name      | Sarah                                                                       |
| Submitter middle name     | Alison                                                                      |
| Submitter surname         | Yarrow                                                                      |
| Submitter is contact      | Yes                                                                         |
| Email                     | <a href="mailto:sarahstevey@gmail.com">sarahstevey@gmail.com</a>            |
| 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 | This area is in the earthquake fault overlay and liquification overlay. Allowing for intensified residential development in this area will expose the Council (and therefore ratepayers) to significant risk and potential costs in the future.                       | Remove the block of Domett Street/Hardy Street/Tasman Street/Nile Street from the High Density Residential Zone and rezone as Comprehensive Area/Residential Lower Density Area |
| Residential Zones | High Density Residential Zone | Oppose         | Blanket rules will result in ad hoc development with no carefully designed shape and form in existing residential neighbourhoods. Requiring neighbourhood plans means that development can happen in a planned and staged way, with the input of the local community. | Require the development of neighbourhood plans to ensure that development in the new residential zones is fit for purpose and has community input                               |

|                                  |                         |                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                   |
|----------------------------------|-------------------------|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| Entire Plan Change               | General opposition      | Oppose in part | <p>Intensify housing in areas closest to the inner city first. Lets see how that goes before moving into well established low rise residential zones. This will also allow time for development of neighbourhood plans to better plan for intensified residential development</p>                                                                                                                                                                                                                                                                                   | <p>Prioritise intensification within the inner city and city fringe zones, remove High Density and Medium Density residential zones</p>           |
| Areas outside of the Plan Change | General opposition      | Oppose         | <p>There is a housing allocation problem in New Zealand because we treat housing as a capital asset to make money off rather than a fundamental human need/right. There are hundreds of houses in Nelson that sit empty or mostly empty as second homes, Air BnBs etc. The Council should investigate (and advocate nationally) for what rules it could bring in to manage for this and free up this housing. I'm sure there are examples from other countries we could learn from</p>                                                                              | <p>Bring in rules to utilise housing stock in Nelson that sits empty for part or all of the time (second homes that are vacant, Air BnBs etc)</p> |
| Entire Plan Change               | The Plan Change process | Oppose         | <p>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 and have hoped that residents with more time and expertise in this area will make more comprehensive submissions covering my concerns as to the future of Nelson and its ratepaying residents.</p> <p>I think PC 29 is missing key steps and elements in its development (such as neighbourhood plans) that would address a lot of my concerns and therefore has been prematurely put out for public submissions.</p> | <p>Withdraw PC 29 and get Council Planning staff to refine the plan design and then put it back out for public submissions</p>                    |

S357

Voided

# Online submission

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

|                           |                                                                             |
|---------------------------|-----------------------------------------------------------------------------|
| Submitter No.             | S358                                                                        |
| Submitter Name            | Barry Chamberlain                                                           |
| Submitter first name      | Barry                                                                       |
| Submitter middle name     | Charles                                                                     |
| Submitter surname         | Chamberlain                                                                 |
| Submitter is contact      | Yes                                                                         |
| Email                     | <a href="mailto:chamberlain.b.j@gmail.com">chamberlain.b.j@gmail.com</a>    |
| Wish to be heard          | No                                                                          |
| Joint presentation        | No                                                                          |
| Trade competition         | I could not gain an advantage in trade competition through this submission. |
| Directly affected         | N/A                                                                         |
| Withhold contact details? | No                                                                          |

## Submission points

| Plan section                       | Provision         | Support/oppose | Reasons                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Decision sought                                                                       |
|------------------------------------|-------------------|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| Natural Hazards/<br>Climate Change | Slope Instability | Oppose         | <p>The slope instability overlay is inaccurate. There were no instances of instability on the Suffolk subdivision, on either completed lots, construction work in progress, or on consented or as yet undeveloped lots during the Nelson 2022 rainfall event.</p> <p>This overlay does not recognize the existing geotechnical subdivision completion report held by NCC that is site specific, supplied by Tonkin &amp; Taylor.</p> <p>Our property at Stoke has also been issued a Building Consent and Codes of Compliance, by Council, confirming all building and geotechnical requirements have been met.</p> <p>This overlay may affect our ability to insure our home in the future. It will also devalue our property and make it difficult to build any additional structures.</p> | REMOVE the proposed slope instability Area 2 overlay affecting our property at Stoke. |

Natural  
Hazards/Climate  
Change

Fault

Oppose

The fault overlay is poorly defined and there is significant uncertainty regarding the specific fault location. It is therefore a total guesstimate at best. This may greatly affect our ability to insure our property in the future. It will also affect any additional future structures or alterations to our home.

**REMOVE** from our property files the fault deformation overlay.

# Online submission

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

|                                  |                                                                             |
|----------------------------------|-----------------------------------------------------------------------------|
| <b>Submitter No.</b>             | S359                                                                        |
| <b>Submitter Name</b>            | Gabriele Kraft                                                              |
| <b>Submitter first name</b>      | Gabriele                                                                    |
| <b>Submitter surname</b>         | Kraft                                                                       |
| <b>Submitter is contact</b>      | Yes                                                                         |
| <b>Email</b>                     | <a href="mailto:gkraft56@gmail.com">gkraft56@gmail.com</a>                  |
| <b>Wish to be heard</b>          | Yes                                                                         |
| <b>Joint presentation</b>        | Yes                                                                         |
| <b>Trade competition</b>         | I could not gain an advantage in trade competition through this submission. |
| <b>Directly affected</b>         | N/A                                                                         |
| <b>Withhold contact details?</b> | No                                                                          |

## Submission points

| Plan section      | Provision                       | Support/oppose | Reasons | Decision sought                                                    |
|-------------------|---------------------------------|----------------|---------|--------------------------------------------------------------------|
| Residential Zones | Medium Density Residential Zone | Oppose         |         | Designate the entire Tahunanui Hills area as "General Residential" |

When Plan 29 first came to our attention, our neighbourhood at 9 Chamberlain Street, in Tahunanui was designated as "General Residential", noting a few proposed changes to support greater provision for modest housing increase. We didn't have any issues with the proposal.

Just last week, a neighbour, a former town planner for the Tasman District council, pointed out that we were incorrect in our view of the proposal. We either had not looked at the proposal closely enough or something had changed since the plan first went out into the community. We noted that our whole neighbourhood, on the Tahunanui hillside has now been designated as a combination of "Medium and High Density Residential".

Apart from obvious individual concerns regarding loss in property value (we suspect for many, like us, this would be our most significant asset) as impacted by potential loss of views and sunshine, those of us who actually live in this area see a significant increase in housing density here as defying all logic.

We note that areas proposed for an increase in housing density require proximity to amenities, low natural hazard risk and convenient transport access.

While it could be argued that this area has access to Tahunanui Primary School by crossing the busy State Highway 6, the area is a fail on all other counts, as residents here would affirm.

1. Topography - the area here is hillside - this may not be evident when looking at a map on a computer screen. It was very evident in the atmospheric river that passed Nelson last year when the hill above lower Tosswill yielded two slips, closing access into the neighbourhood. (This is directly below the area proposed for High density housing.) Historically, in the early 80's or late 70's, a slip inundated a house

below Chamberlain, towards the Mairi end of the street, which (from memory) may even have resulted in a fatality. With every significant rainfall event many of us are dealing with the results of inadequate stormwater drainage as volumes of water succumb to gravity. Most of the consequences go unreported as we roll up our sleeves and deal to the aftermath ourselves. Again, by way of example in the same weather event mentioned above, our own property had waterfalls coming from the property above us at 9 Rangiora Terrace flooding and covering in 2 cm of silt the areas behind, on both sides of the house and the basement. This example is not limited to us, but stories like this can be repeated by long term residents of the neighbourhood - now designated for greater intensification. In preparing for greater resilience in our communities, why would one wish to intensify building on steep hillsides that are already vulnerable in what seem to be increasing extreme weather events.

2. Infrastructure - Linked to the above, the existing storm water provisions have already demonstrated over time that they are not always adequate for the existing homes, never mind adding to the issue with even more of our permeable green spaces covered with the proposed structures. Additionally the streets in our neighbourhood are for the most part narrow and winding. We have just recently petitioned for and have successfully had speed humps installed, which have significantly reduced both the volume and the speed with which traffic moves through this residential neighbourhood. The last thing we need is for the volume to be increased again as a result of more dwellings packed into this area, once again challenging the safety of current residents. Current new parking bylaws, by which off-street parking provisions are not required in new builds, will further exacerbate the issues on our narrow streets.

5. Access to public transport - while we used to have a bus running a loop which included Tosswill and Stansell Avenues, instead of enjoying a greater range and frequency of this service, we have lost this completely. Now it takes an able-bodied person approximately 20 minutes to access Route 2 on Muritai Street or approximately 30 minutes to access the "Big Blue Behemoth" that now terrorizes drivers and residents on the new Route 4, from the Tosswill/Chamberlain roundabout. This is not a viable option for the aged or for those with young families and groceries to carry, presumably included in the range of intended occupants of any new homes.

Ours is a close-knit, supportive community that works well. A testament to that is not only the above mentioned speed humps, but also our neighbourhood funded AED installed for ready access. Why would you want to destroy a strong, well functioning neighbourhood based on .....???? Well we can't see why this area would suddenly be seen as suitable for greater housing density.

While we can't speak to the advantages or disadvantages of Plan 29 in other neighbourhoods, we are strongly opposed to greater intensification in our neighbourhood.

Residential  
Zones

Please support us in our desire to keep our Tahunanui hillside neighbourhood designated as "General Residential".

Rather than taking a broad brush approach to housing intensification here in Nelson, look at site specific solutions that would take into consideration the topography/geology of each area, impact on current residents, aesthetics and maximizing sun angles.

Let's be creative here and not ruin a great little city.

While there appears to be a shortage of housing/rental homes here in Nelson, I also agree that it makes no sense to be ever-expanding into our green spaces. It also makes sense to provide homes where people have easy access to amenities without always relying on single occupant vehicles.

So while I am not happy with the plan 29 as it has been presented, here are some ideas to consider, based on having lived and travelled overseas:

1. The first area to consider for intensification is our own CBD. We have a number of sad looking buildings in our CBD, some of which are currently vacant. Before building anything with a new footprint, why not redevelop these existing buildings, maintaining current retail and office spaces, but then redesigning upper levels to become attractive apartments with provision for roof-top gardens. This is the only part of our city where it would be appropriate to build up - but not to six stories. Currently the NCC building and the Rutherford hotel stand out (possibly as eyesores). I for one would not like to see these types of buildings proliferate. I would support a maximum height of 4 stories, including the roof-top garden. This type of development could bring a much needed vibrancy to our CBD.

2. In a city of our size and character six story apartments have no place in any of our residential areas. As sections become available, consider low-level townhouses (no more than two stories high), or terraced homes on stable hillsides. Encourage neighbourhood engagement and design competitions.

3. While there are not many larger sections left in our city, there are a few that would be suitable for subdivision or for accommodating more homes - not 3 story monstrosities, but tasteful homes that would blend with the

existing character of each neighbourhood. Currently there are numerous costs, red-tape and barriers facing property owners who could potentially provide for more housing on existing sections. Perhaps the council could offer support, both financial and technical to allow for more homes to be built on these sections. This could include provisions for creative solutions such as encouraging the building of tiny houses and granny flats with support from the council for access, retaining walls, drainage, sewer, fresh water and power.

We love our city and encourage creative thinking to retain all the qualities that make Nelson special.

# Online submission

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

|                           |                                                                             |
|---------------------------|-----------------------------------------------------------------------------|
| Submitter No.             | S360                                                                        |
| Submitter Name            | Colin McBright                                                              |
| Submitter first name      | Colin                                                                       |
| Submitter middle name     | David Arthur                                                                |
| Submitter surname         | McBright                                                                    |
| Submitter is contact      | Yes                                                                         |
| Email                     | <a href="mailto:colinmcbright@gmail.com">colinmcbright@gmail.com</a>        |
| Wish to be heard          | No                                                                          |
| Joint presentation        | No                                                                          |
| Trade competition         | I could not gain an advantage in trade competition through this submission. |
| Directly affected         | N/A                                                                         |
| Withhold contact details? | No                                                                          |

## Submission points

| Plan section       | Provision          | Support/oppose | Reasons                                                                                                                                                                                                                                                                                                                                                                                                                                      | Decision sought                                                          |
|--------------------|--------------------|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|
| Entire Plan Change | General opposition | Oppose         | <p>I support the plan to increase intensification of housing in Nelson to reduce urban sprawl.</p> <p>I am opposed to Plan Change 29 for two reasons:</p> <p>1) Building of six stories are too high for Nelson and there should be a maximum of 3 stories.</p> <p>2) It is not appropriate for developers to build properties without resource consent as neighbours should be consulted if a high property will affect their property.</p> | I oppose Plan Change 29 and would ask the council not to implement this. |

## Documents included with submission

None

# Online submission

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

|                                  |                                                                              |
|----------------------------------|------------------------------------------------------------------------------|
| <b>Submitter No.</b>             | S361                                                                         |
| <b>Submitter Name</b>            | Michael Scott                                                                |
| <b>Submitter first name</b>      | Michael                                                                      |
| <b>Submitter middle name</b>     | John                                                                         |
| <b>Submitter surname</b>         | Scott                                                                        |
| <b>Submitter is contact</b>      | Yes                                                                          |
| <b>Email</b>                     | <a href="mailto:mike@thecatalystgroup.co.nz">mike@thecatalystgroup.co.nz</a> |
| <b>Wish to be heard</b>          | Yes                                                                          |
| <b>Joint presentation</b>        | Yes                                                                          |
| <b>Trade competition</b>         | I could not gain an advantage in trade competition through this submission.  |
| <b>Directly affected</b>         | N/A                                                                          |
| <b>Withhold contact details?</b> | No                                                                           |

## Submission points

| Plan section | Provision               | Support/oppose | Reasons                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Decision sought                                                                                                                                  |
|--------------|-------------------------|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| Mapping      | Natural hazards mapping | Oppose in part | The map shows flood potential coming from the road onto the property near the southern end of the boundary with the road. My experience of heavy rainfall events during the 6 years I have lived at the property is that water comes off the road and down the driveway and does not come in at that part of the property at all. In addition, I am currently levelling out the front berm with a raised edge against the fence. Therefore, the mapping showing the potential for floodwater to come onto the property and under the house does not reflect the reality on the ground. | Remove the breakout of the Flood hazard overlay from Kawai St South onto the southern end of the boundary of 206 that then goes under the house. |

|                   |                                 |                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                  |
|-------------------|---------------------------------|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| Mapping           | Natural hazards mapping         | Oppose in part  | <p>The high flood hazard overlay is showing on an area of the 206 Kawai St South that is above the retaining wall that contains the Wairepo / York Stream. That area of the property is covered in young native forest. The banks in that area are no lower than other areas directly above the retaining walls, including on neighbouring properties. In addition, the forest regrowth in that area is showing the best growth rates of any of the properties along the retaining wall. If the floodwaters were to reach that height, any hazard (either through erosion or being swept away) would be substantially mitigated by the presence of the trees.</p> | Remove the isolated squares of high flood hazard overlay on 206 Kawai St South                                                   |
| Residential Zones | Medium Density Residential Zone | Support in part | <p>The southern end of Nelson South currently only has one small area zoned public open space. This area is directly next to Nelson South Kindergarten and is completely surrounded by houses. The area has no passive surveillance and is not an area that people feel naturally inclined to linger in. With the wider area to be rezoned to Medium density residential, the population of the neighbourhood will increase substantially and areas of private public space will be reduced. It is important that the policy framework acknowledges that public open space will become even more important.</p>                                                   | RE1.7 - Amend the policy to read "...with supporting small scale commercial activities and access to quality public open space." |

|                   |                               |                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                |
|-------------------|-------------------------------|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mapping           | Rezoning                      | Amend           | <p>Nelson South does not have zoned areas of Open Space, apart from a very small playground next to Nelson South kindergarten, which is not fit for purpose, especially given the increasing density that the plan change will enable. The Railway Reserve is heavily used by the community as a linear park. It is a world-class active transport link between Stoke and the Nelson CBD, provides opportunities for exercise, fresh air and quiet contemplation for those living in the area. It also links Victory Primary School, Victory Community Centre, Nelson Intermediate School and businesses in the Victory suburban commercial centre to the community they serve. This should be recognised on the council planning maps.</p> | <p>Amend the mapping over the area of the Railway Reserve through Nelson South to Open Space zone.</p>                                                                         |
| Mapping           | Rezoning                      | Amend           | <p>With the increasing density in the area, the suburban commercial zone should be expanded to include at least the current non-residential activities in the area. Where density is increasing, it is important that people will have more destinations within walking distance, to provide more community contact and vibrant neighbourhoods and prevent ghettoisation.</p>                                                                                                                                                                                                                                                                                                                                                               | <p>Expand the suburban commercial area around Hales Corner (Tukuka and Waimea Road) to include the other non-residential activities in the area.</p>                           |
| Residential Zones | High Density Residential Zone | Support in part | <p>In higher density areas it is important that places offer residents and passersby the opportunity to linger. This makes for a more interesting neighbourhood, is more people-centred, is safer and feels safer. Small-scale commercial offers those opportunities, and so does quality public open space.</p>                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>Support the objective in general, in particular the reference to small-scale commercial. Amend Objective Re1.8 to include "...and access to quality public open space."</p> |

|                      |                                |       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                   |
|----------------------|--------------------------------|-------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Residential<br>Zones | General<br>Residential<br>Zone | Amend | <p>These zones are not suitable for comparative retail, but with the density increasing, they would be complemented very well with some supportive retail that enables residents to fulfil everyday needs (buying milk, catching up with a friend for coffee are already provided for; other compatible commercial activities in the zone would include getting a haircut or having a shirt repaired, getting nails done, doing the laundry) without leaving the neighbourhood. If these activities are not included in the zone, then suburban commercial zones should be expanded to accommodate them.</p> | <p>Amend REr.18O, REr.18P and REr.18Q so they are not in conflict with each other (also do the same for the High density residential zone commercial activity rules). Also provide for other small-scale commercial activities such as barbers, hairdressers, tailors and similar service-oriented or place-based activities.</p> |
|----------------------|--------------------------------|-------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

# Online submission

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

|                                  |                                                                             |
|----------------------------------|-----------------------------------------------------------------------------|
| <b>Submitter No.</b>             | S362                                                                        |
| <b>Submitter Name</b>            | Beverley Webster                                                            |
| <b>Submitter first name</b>      | Beverley                                                                    |
| <b>Submitter middle name</b>     | Joan                                                                        |
| <b>Submitter surname</b>         | Webster                                                                     |
| <b>Submitter is contact</b>      | Yes                                                                         |
| <b>Email</b>                     | <a href="mailto:aandbwebster@gmail.com">aandbwebster@gmail.com</a>          |
| <b>Wish to be heard</b>          | No                                                                          |
| <b>Joint presentation</b>        | Yes                                                                         |
| <b>Trade competition</b>         | I could not gain an advantage in trade competition through this submission. |
| <b>Directly affected</b>         | N/A                                                                         |
| <b>Withhold contact details?</b> | No                                                                          |

## Submission points

| Plan section      | Provision                       | Support/oppose | Reasons                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Decision sought                                                                                                    |
|-------------------|---------------------------------|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| Residential Zones | Medium Density Residential Zone | Oppose         | <p>We note that our whole neighbourhood has now been designated as a combination of "Medium and High Density Residential".</p> <p>1 Slippage: Some of our neighbourhood have hazard identification overlays on council files that indicate risk of slip damage. Our house is not affected but directly over the road is affected by this as well as nearby properties.</p> <p>Last year there were two slips on Tosswill Road, closing access into the neighbourhood near the area designated for high density housing in the plan. In recent years slips near Atarau Way resulted in a river of mud flowing down Chamberlain Street - According to the Council worker I spoke to on that day, they worked hard to successfully prevent "the whole hill coming down". On another occasion water was coursing down the side 5A Chamberlain Street due to a culvert to an underground stream on our boundary being compromised. (I'm sorry I cannot remember the date). I built a wall to prevent it going inside number 5A, but a garden with a retaining wall was swept down the side of the house. Number 5 Chamberlain Street was also badly affected by this. Further along Chamberlain Street and Maire Street properties have been affected by slips from Zeehaen Place and other runoff from higher up the hill. The walking track near Maire Street was also affected. We are not far from the Tamaki Street Steps which have been badly affected by slips.</p> | That Chamberlain Street neighbourhood be redesignated as "General Residential" rather than Medium or high density. |

Just this month we had a torrent of muddy water rushing down the road and encroaching up our driveway. The force was so great that it eroded some of the surface of the road. With more extreme weather events and development further up the hill, the stormwater systems seem to be overrun and our lower driveway is often flooded. We have installed large amounts of drainage on our section to minimise the flooding risks but we are concerned about destabilising the hill further with adding more buildings and having less drainable land.

2 Access: We have recently had speed humps installed on our road as the traffic density from the overflow from Tahunanui drive was not safe, due to the winding and narrow nature of our roads. Higher density thresholds would exacerbate this situation.

We do not have easy access to amenities due to the high volume of traffic on Tahunanui drive and those who do not enjoy moderate fitness would not manage the hill if walking.

We no longer have a bus with easy access unless you are fit enough to walk up and down the hill.

Thank you for listening.  
Bev Webster

# Online submission

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

|                                  |                                                                             |
|----------------------------------|-----------------------------------------------------------------------------|
| <b>Submitter No.</b>             | S363                                                                        |
| <b>Submitter Name</b>            | Scott Williamson                                                            |
| <b>Submitter first name</b>      | Scott                                                                       |
| <b>Submitter surname</b>         | Williamson                                                                  |
| <b>Submitter is contact</b>      | Yes                                                                         |
| <b>Email</b>                     | <a href="mailto:scott@resworks.co.nz">scott@resworks.co.nz</a>              |
| <b>Wish to be heard</b>          | No                                                                          |
| <b>Joint presentation</b>        | Yes                                                                         |
| <b>Trade competition</b>         | I could not gain an advantage in trade competition through this submission. |
| <b>Directly affected</b>         | N/A                                                                         |
| <b>Withhold contact details?</b> | No                                                                          |

## Submission points

| Plan section                     | Provision        | Support/oppose | Reasons                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Decision sought                                                                                                                          |
|----------------------------------|------------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| Inner City and City Fringe Zones | City Fringe Zone | Support        | <p>1) its a bold move. I support bold moves as incrementalism is rarely successful in the the policy development process or space.</p> <p>2) NIMBY has to yield to the greater good. If we NEVER allowed changes to impact n anyone we'd still be living in caves supporting the flint makers guild. There is no parato optimal solutions to the issues facing humanity.</p> <p>3) I want to see no more farmland going under housing. Berrylands in the TDC is an abomination and insult to our needs for food in the future.</p> <p>4) Nelson as a city will die if we dont densify.</p> | That the proposed plan 29 be adopted in its current for or with as little change as is necessary to ensure that the densification of the |

# Online submission

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

|                           |                                                                             |
|---------------------------|-----------------------------------------------------------------------------|
| Submitter No.             | S364                                                                        |
| Submitter Name            | Christopher White                                                           |
| Submitter first name      | Christopher                                                                 |
| Submitter middle name     | John                                                                        |
| Submitter surname         | White                                                                       |
| Submitter is contact      | Yes                                                                         |
| Email                     | <a href="mailto:whiteycj65@gmail.com">whiteycj65@gmail.com</a>              |
| Wish to be heard          | No                                                                          |
| Joint presentation        | No                                                                          |
| Trade competition         | I could not gain an advantage in trade competition through this submission. |
| Directly affected         | N/A                                                                         |
| Withhold contact details? | No                                                                          |

## Submission points

| Plan section       | Provision       | Support/oppose | Reasons                                                                                                                                                                                                                                                                | Decision sought                                                                                                                                                                   |
|--------------------|-----------------|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Entire Plan Change | General support | Support        | To avoid more sprawl on fertile farmland.<br>More housing for increasing population.<br>Easier for walking and biking options.<br>More people living in the inner city will bring vitality and help retailers.<br>Update housing stock and add more choice in housing. | I would like the council to support Plan 29.<br><br>If possible some oversight by urban designers to ensure that the result is a harmonious and pleasant city would be desirable. |

## Documents included with submission

None

S365

Voided

# Online submission

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

|                           |                                                                             |
|---------------------------|-----------------------------------------------------------------------------|
| Submitter No.             | S366                                                                        |
| Submitter Name            | Athol Webster                                                               |
| Submitter first name      | Athol                                                                       |
| Submitter middle name     | David                                                                       |
| Submitter surname         | Webster                                                                     |
| Submitter is contact      | Yes                                                                         |
| Email                     | <a href="mailto:atholwebster@gmail.com">atholwebster@gmail.com</a>          |
| Wish to be heard          | No                                                                          |
| Joint presentation        | Yes                                                                         |
| Trade competition         | I could not gain an advantage in trade competition through this submission. |
| Directly affected         | N/A                                                                         |
| Withhold contact details? | No                                                                          |

## Submission points

| Plan section      | Provision                       | Support/oppose | Reasons                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Decision sought                                                                                                                                             |
|-------------------|---------------------------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Residential Zones | Medium Density Residential Zone | Oppose in part | <p>We note that our neighbourhood surrounding 7 Chamberlain Street has now been designated as a combination of "Medium and High Density Residential" on the proposed zoning plan.</p> <p>1 Slippage: Some of our neighbourhood have hazard identification overlays on council files that indicate risk of slip damage. Our house is not affected but directly over the road is affected by this as well as nearby properties.</p> <p>Last year there were two slips on Tosswill Road, closing access into the neighbourhood near the area designated for high density housing in the plan. In recent years slips near Atarau Way resulted in a river of mud flowing down Chamberlain Street - According to the Council worker I spoke to on that day, they worked hard to successfully prevent "the whole hill coming down". On another occasion water was coursing down the side 5A Chamberlain Street due to a culvert to an underground stream on our boundary being compromised. (I'm sorry I cannot remember the date). We built a wall to prevent it going inside number 5A, but a garden with a retaining wall was swept down the side of the house. Number 5 Chamberlain Street was also badly affected by this. Further along Chamberlain Street and Maire Street properties have been affected by slips from Zeahaen Place and other runoff from higher up the hill. The walking track near Maire Street was also affected. We are not far from the Tamaki Street Steps which have been badly affected by slips.</p> | To change Chamberlain Street, Toswill Road and Maire Street neighbourhood to general residential as opposed to medium or high residential on proposed plan. |

Just this month we had a torrent of muddy water rushing down the road and encroaching up our driveway. The force was so great that it eroded some of the surface of the road. With more extreme weather events and development further up the hill, the stormwater systems seem to be overrun and our lower driveway is often flooded. We have installed large amounts of drainage on our section to minimise the flooding risks but we are concerned about destabilising the hill further with adding more buildings and having less drainable land.

2 Access: We have recently had speed humps installed on our road as the traffic density from the overflow from Tahunanui drive was not safe, due to the winding and narrow nature of our roads. Higher density thresholds would exacerbate this situation.

We do not have easy access to amenities due to the high volume of traffic on Tahunanui drive and those who do not enjoy moderate fitness would not manage the hill if walking.

We no longer have a bus with easy access unless you are fit enough to walk up and down the hill.

Thank you for listening.  
Athol Webster

S367

Voided

|                                                                                                                     |                                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| To: -<br>Senior Planning Administrator<br>RMA Plan Submissions<br>Nelson City Council<br>P O Box 645<br>Nelson 7040 | Submitter: -<br>Philip McKinlay<br><br><br>Telephone: -<br>Email: - <a href="mailto:philip.mckinlay7@gmail.com">philip.mckinlay7@gmail.com</a> |
|---------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|

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

**"I REJECT PLAN CHANGE 29 IN ITS ENTIRETY, BUT IF IT IS NOT REJECTED, THESE ARE THE POINTS I WISH TO MAKE".**

**1. Replace High Density Residential Zones with the General Residential Zone**

I understand the requirement for Central Government and Councils to plan for population growth and to consider options for improving access to housing for people who currently struggle to access affordable homes. In addition, I am aware that Nelson is exposed to risk from geological (earthquakes and land slips) and climate events such as flooding so any development needs to consider ways to mitigate these risks.

Nelson City Council has overreached the legal requirements to provide high-density housing as it is not a Tier 1 City (it is only a Tier 2 city). Therefore, Council should only consider the requirements for a Tier 2 city. Council and the planning rules alone will not necessarily overcome what is a global problem of a lack of affordable housing.

I request that the council removes the High Density Residential Zones area from Plan Change 29 and either leaves the existing zoning (as currently applies to 25 Bronte Street) or replaces it with the General Residential Zone that

allows for up to three, two-storey, buildings on a site, provided existing sunlight, daylight and outlook provisions are retained and protected.

I further note that I am not technically qualified as a town planner and have used plain language in this submission which may not equate to the technical terms used in the extremely long and complicated documents which comprise Plan Change 29 and its many attachments / supporting documents.

## 2. Loss of sunlight, daylight and outlook.

However, if Council does go ahead with Plan Change 29, I would like to submit on the following specific issues, which particularly concern and affect me:

Loss of sunlight, daylight and outlook.

- a. 25 Bronte Street currently has access to all-day sun, daylight and a northerly view over the city and out to sea.
- b. Under Plan Change 29 the majority of the residential area to the north of the property and to the South of Christ Church Cathedral, is zoned HIGH DENSITY, which allows for building of up to 6 stories to be constructed up to one metre from the boundary of neighbouring properties with no protection of existing daylight, sunlight or outlook.
- c. 25 Bronte Street is a rear section and is surrounded by seven immediate properties (see "attachment 1, 25 Bronte Street, Surrounding Properties"), all of which are zoned HIGH DENSITY under Plan Change 29. If Plan Change 29 is not stopped, these seven surrounding properties can be built up to six stories under the HIGH DENSITY zone and fully block our sun, daylight and outlook.

When we purchased 25 Bronte Street we made the purchase decision based on the following criteria, which were

- i. Sunlight and outlook;
- ii. Ability to grow our own fruit and vegetables, (we are self sufficient in vegetables during the summer); and
- iii. Easy walking access to Central Nelson;

The proposed changes will mean that the first two and most important criteria will no longer be assured.

The Nelson City and Tasman District Councils commissioned a report in June 2021 "Nelson-Tasman Housing We'd Choose - Housing Demand Preferences". In Figure

4.9: "Ranked Preferences of Housing - Nelson Urban", 100% of Residents ranked "Sunny" as their most important preference. I therefore find it concerning that the Council, having commissioned this report in June of 2021, seems to have ignored the findings of this report in PC29.

### 3. The Plan Change 29 ("PC 29) Process.

I want to voice the following concerns:

- a. I find that the promotion of PC29 by the Council has been misleading in that it implies that it is the only option available AND that it is required by law. The plan is not the only option and Nelson is not required to provide for high-density housing.
- b. I also feel that there appears to be a level of defensiveness in the discussions of the plan, by the Mayor and the planning staff, (which is understandable as they want to defend the work they have completed) but the point of the consultation process is to receive feedback.
- c. The Council appears to have ignored the " Nelson-Tasman Housing We'd Choose - Housing Demand Preferences". Report in assessing the factors for PC29, which indicates to me that it has "cherry picked" the information that supports its pre-determined outcomes.
- d. 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.
- e. That access to a paper copy of PC 29 and the Section 32 reports has not been made freely available for residents who do not have access to, or the ability to use a computer, or prefer to have access to printed material.
- f. That I have found PC 29's lack of early public engagement and consultation by Nelson City Council, (with its severe implications towards the well-being of existing rate paying residents enjoyment of their properties), extremely stressful and unnecessary.
- g. That I have been put in a position of hoping more qualified citizens than I will make more comprehensive submissions covering my concerns as to the future of Nelson and its rate paying residents.
- h. That PC 29 appears to have been designed as a "broad brush" approach that requires public submissions to refine the plan. Such a statement implies PC 29 may have 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 (the rate payers) can re-design it. Therefore I am asking Nelson City Council to withdraw PC 29 in its entirety.

#### 4. Hearing Panel

I strongly disagree with the make-up of the hearing panel commissioners because of the public (and my) perception that it is "biased". This was following the vote Councillor Mel Courtney moved at the 14<sup>th</sup> September 2023 Council meeting, that the council withdraw Plan Change 29 and instead consult on it as a draft document. The current two commissioners on the panel are Roahn O'Neill-Stevens and Trudie Brand (both of whom voted against Mel Courtney's motion to withdraw Plan Change 29 and instead consult on it as a draft document). I ask the Council to appoint Councillors from either side of the Sept 14<sup>th</sup> vote. It is also worth noting that of the 12 votes on Councillor Mel Courtney's motion, 5 were for and 7 against. In contrast to this voting outcome, as indicated by the numerous public meetings I have attended, there appears to be at least 90% of rate payers who would have voted For Councillor Courtney's motion.

This is one area where I have found the Mayor's public response to be defensive and intransigent. He does not seem willing to even consider a challenge to his selection.

#### 5. NCC's Population forecasts

The population growth forecasts are pivotal to the scale of the plan, which Nelson needs to adopt 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 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 " Using Statistics New Zealand....." and amend its intensification requirements accordingly.

In addition to the concerns as to whether the correct population growth statistics have been used the proposed plan appears to accommodate even more growth than is expected on these "inflated" projections.

## 6. 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. Contemporary Black Iron Clad Boxes, (for example, Apartments at 343 Trafalgar Square), built only metres from 120-year-old Historic Homes show a thoughtless lack of long-term vision for maintaining the attraction of Nelson for all the future residents and visitors.
- d. 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 a Nelson Urban Development Agency to carefully guide growth and actively facilitate the emergence of cohesive urban neighbourhoods with a variety of high-quality housing choices.

## 7. 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. Tasman District Council 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. Reference is made again to the previously mentioned " Nelson-Tasman Housing We'd Choose - Housing Demand Preferences", (in point 2 above). In Figure 4.9: "Ranked Preferences of Housing - Nelson Urban", where 100% of Residents ranked "Sunny" as their most important preference.
- d. All existing houses built prior to and under the current daylight admission rules (Nelson Resource Management Plan - appendix 15, daylight admission - residential) will be subjected to the loss of sunlight amenity under PC29 with the following effects: -
  - i. Increased levels of mental health illness, anxiety and stress.
  - ii. Increased levels of damp homes with associated mould and mildew and respiratory illnesses.
  - iii. Shadowing of 'Green Energy' Solar Arrays and Passive Solar Energy Heating.
  - iv. Increased heating costs, air pollution, carbon foot print, are all exacerbated due to a large portion of Nelson housing being old, with un-insulated walls and single glazing with open fires being legislated out of use many years ago.
  - v. Reduction in property values and increased financial stress, because the houses would be less desirable to live in.
  - vi. Residents, struggling with the cost-of-living crisis may not be able to afford to heat their homes.
  - vii. Property owners will be reluctant to invest in making additional new (low rise) infill improvements on their section, due to the fact that "affordable" additional units could be built by a wealthier developer, who could afford to build a multi-storey development around established properties at any time in the future.
    - 1. I ask the Council to maintain the Nelson Resource Management Plan - appendix 15, daylight admission - residential protection rules to all pre-existing properties, unless the owner gives written approval to the contrary.

2. I strongly support the inclusion of "Nelson Resource Management Plan - Section 32 Report, paragraphs: RE2.3 Daylight and Sunlight" policy statement "Buildings and Structures should be designed and sited so that adjoining sites are not unduly shaded and there is reasonable access to daylight", and RE2.5 "The size and scale of buildings, structures, should be compatible with the character and amenity of the residential area".

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.

## 8. Privacy and Outlook

Privacy is a critical part of enjoying a property. I support the inclusion of "Chapter 07, Residential Objectives and Policies "- RE2.4.iii, "The Building Act controls windows in walls of buildings on or close to boundaries', 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'.

## 9. Intensification

- a. As previously stated, I reject everything about Plan Change 29, 100% in its entirety. It is not in character or in keeping with the existing 'General Residential Zone'.
  - i. I ask Council to re-apply the current General Residential Zone across the entire Nelson district, 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 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.
- c. Bigger older properties, could be better utilised and help with our growth if they were more easily allowed to be divided into multi-dwellings.
- d. 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.
- e. 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.
- f. 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.

## 10. Progressively Phased Intensification

To accommodate the "expected" population growth the Council should take a staged approach to intensification.

- a. Firstly, the Inner City - Centre (North of the Cathedral in pale blue on the Plan map) 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 the zone enabling and encouraging 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, the Inner City - Fringe ( also in blue on the plan map) could 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 to accommodate their businesses.

#### **11. Intensification in hazard zones**

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.

#### **12. Intensification with "Granny Flat" alternative.**

One of the issues of concern is the lack of affordable housing in NZ generally and in Nelson in particular. PC29 does not appear to do anything to address the affordability concerns and it seems that inner city apartments are in general around the \$1million plus range, which is not affordable to many residents. The multi storey buildings are likely only to benefit developers and building companies. As mentioned above I support the replacement of the High Density Residential Zone with the General Residential Zone, which allows for the building of Granny Flats and Tiny Homes.

A report by town planning research analysts Archistar, lender Blackfort and property data group CoreLogic in Australia has just been released into using Granny Flats as a viable alternative in solving their housing crisis concluding that there was an "untapped potential to boost housing supply".

The Report "Granny Flats" dated October 2023 has identified 655,000 residential properties suitable for Granny Flats across Sydney, Melbourne and Brisbane. The report says that granny flats have the ability to quickly and affordably address some of their current housing crisis. The report also says that for homeowners, the addition of a second self-contained unit provides an opportunity to provide rental housing or additional accommodation for family members while at the same time increasing the value of their property and potentially attaining additional rental income.

I recommend that Council take a serious look at the option of Granny Flats for Nelson properties. With an ageing population in Nelson the Granny Flat alternative would be welcome. Property owners could receive additional income from the Granny Flat, or owners could live in the Granny Flat and rent their main property. A link to an article by the ABC and a further link to the report itself can be found at:

<https://www.abc.net.au/news/2023-10-17/homes-suitable-for-granny-flats-in-sydney-melbourne-brisbane/102981440>

### **13. On-street car parking**

- a. Increased intensification will result in more on-street car parking and the narrow streets of Nelson will become a hazard to pedestrians, mobility scooters, and 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. E.g. Speed Humps, instead of Choke Points.

#### 14. Social Housing

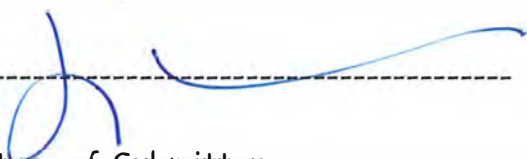
- a. Significant care and attention must be considered with all social housing to ensure it is well integrated into the community and that the residents have their social needs supported because there are too many examples across the country where this has resulted in disharmony in communities.
- b. 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.

#### 15. 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.

**16. VISUAL POLLUTION OF THE ENVIRONMENT - AN EYESORE.**

I am referring to the visible deterioration and negative aesthetic quality of human-made landscapes caused by the implementation of the proposed Plan Change 29. The resulting EYESORE, could easily shave a 10% to 20% discount off affected residential properties. People will flee the city, in want of less visually polluted areas, which of course is exactly the OPPOSITE of what the proposed Plan Change 29 intended! I ask that Nelson City Council carries out an independent "Visual Pollution Assessment" (VPA) immediately, based on the proposed new zoning areas under Plan Change 29. Without a VPA the new density areas will be left to developer's discretion and Nelson City will become a national eyesore, rather than a city with a consistent pattern of development.

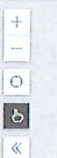


Signature of Submitter  
Philip McKinlay

Date: - 27/10/2023

  
Nelson City Council  
Te Kaitiaki o Whakatū

Search for an address...



MP  
 Expiry Date: 01 Sep 2004  
 Revision: 21 Sep 2023  
 The following information applies to this  
 property

### Road Hierarchy

6 m

Eagle Technology Land Information New Zealand GEBCO Community maps contributors | Top Of The South Maps

Powered by Esri

## Map Tools

### Map click selection mode

| Property | Feature |
|----------|---------|
|----------|---------|

Map Layers ^

☐ PC31 The Junction 

PC29 Housing ✓

☒ NRMP Zones ☐ **NRMP Roads** ☐ NRMPS - All ...☐ NRIAP Port Airport ☐ Nelson Air Quality Plan☐ NRMP Heritage ☐ NRMP Hazards ☐ **NRMP General Overlay**☐ NRMP Coastal 

### Boundaries and Labels

- Boundaries and Labels
- Support and Affection

**Property and Address:**

☐ Plan Attachments 

**TRANSMISSION:** 1

Transparency  $\Delta$

100

## Basemaps ^

| Aerial | Streets |
|--------|---------|
|--------|---------|

Measure Draw 

**Legend**

Help

# Online submission

Received: 31/10/2023  
NDOCS-539570224-18387

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

|                                  |                                                                             |
|----------------------------------|-----------------------------------------------------------------------------|
| <b>Submitter No.</b>             | S369                                                                        |
| <b>Submitter Name</b>            | Stephen Bayley                                                              |
| <b>Submitter first name</b>      | Stephen                                                                     |
| <b>Submitter surname</b>         | Bayley                                                                      |
| <b>Submitter is contact</b>      | Yes                                                                         |
| <b>Email</b>                     | <a href="mailto:stephenrbayley@gmail.com">stephenrbayley@gmail.com</a>      |
| <b>Wish to be heard</b>          | Yes                                                                         |
| <b>Joint presentation</b>        | No                                                                          |
| <b>Trade competition</b>         | I could not gain an advantage in trade competition through this submission. |
| <b>Directly affected</b>         | N/A                                                                         |
| <b>Withhold contact details?</b> | No                                                                          |

## Submission points

| Plan section      | Provision                       | Support/oppose | Reasons                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Decision sought                                                                                                                                                               |
|-------------------|---------------------------------|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Residential Zones | Medium Density Residential Zone | Oppose         | <p>Looking at the Nelson City central business district, the majority of buildings are single level.</p> <p>I feel it would be appropriate for high density residential to be built within in the central business district to a height of 8 to 10 levels. Immediate locations are above the carparks; Whakatu, Buxton, and Montgomery. This will create covered carparking for vehicles during the week and the Saturday market.</p> <p>Surrounding residential dwellings should be encouraged to adopt "sponge" planting to absorb heavy rainfalls.</p> | For Nelson City Council to continue with existing residential criteria as to building height, sunlight angles, footprint, distance from boundaries, and providing carparking. |

## Documents included with submission

None

S370

Voided

# Online submission

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

|                           |                                                                              |
|---------------------------|------------------------------------------------------------------------------|
| Submitter No.             | S371                                                                         |
| Submitter Name            | janet moloney                                                                |
| Submitter first name      | janet                                                                        |
| Submitter middle name     | marie                                                                        |
| Submitter surname         | moloney                                                                      |
| Submitter is contact      | Yes                                                                          |
| Email                     | <a href="mailto:tom.janet.moloney@gmail.com">tom.janet.moloney@gmail.com</a> |
| Wish to be heard          | No                                                                           |
| Joint presentation        | Yes                                                                          |
| Trade competition         | I could not gain an advantage in trade competition through this submission.  |
| Directly affected         | N/A                                                                          |
| Withhold contact details? | No                                                                           |

## Submission points

| Plan section      | Provision                     | Support/oppose | Reasons                                                                                                                                                                                                                                                                                                                                                                      | Decision sought                                                                                                                                                                                                                                                                                                                        |
|-------------------|-------------------------------|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Residential Zones | High Density Residential Zone | Oppose         | <p>I am concerned about the negative impact of high density buildings on existing properties in this area; including impact on sunlight, privacy, neighbourhood character, garden productivity and solar panel effectiveness.</p> <p>My preference would be for high density housing in the CBD, where encroachment on other residential properties is much less likely.</p> | <p>I am opposed to the proposed high density zone; in particular for the area around the cathedral, and in particular the proposed height of 19.5m.</p> <p>I am also opposed to the removal of provisions that allow for non-notification.</p> <p>I think a better solution would be to encourage high density housing in the CBD.</p> |

## Documents included with submission

None

# Online submission

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

|                                  |                                                                                        |
|----------------------------------|----------------------------------------------------------------------------------------|
| <b>Submitter No.</b>             | S372                                                                                   |
| <b>Submitter Name</b>            | Evan McKenzie                                                                          |
| <b>Submitter first name</b>      | Evan                                                                                   |
| <b>Submitter middle name</b>     | Thomas                                                                                 |
| <b>Submitter surname</b>         | McKenzie                                                                               |
| <b>Submitter is contact</b>      | Yes                                                                                    |
| <b>Email</b>                     | <a href="mailto:evanandsarah.mckenzie@xtra.co.nz">evanandsarah.mckenzie@xtra.co.nz</a> |
| <b>Wish to be heard</b>          | No                                                                                     |
| <b>Joint presentation</b>        | No                                                                                     |
| <b>Trade competition</b>         | I could not gain an advantage in trade competition through this submission.            |
| <b>Directly affected</b>         | N/A                                                                                    |
| <b>Withhold contact details?</b> | No                                                                                     |

## Submission points

| Plan section      | Provision                     | Support/oppose | Reasons                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Decision sought                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------|-------------------------------|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Residential Zones | High Density Residential Zone | Oppose in part | <p>Six level, 19.5m buildings erected within existing residential communities will cause severe loss of amenity value to those existing properties in particular but also the real risk of significant property devaluation. There are locations such as inner city, commercial/industrial fringes, etc, where 19.5m residential buildings would cause no detrimental effects on neighbours. Examples are the Rocks Rd apartments. The now-commercial retail site at Mitre 10 would also have been an appropriate location for high rise apartments. Quite simply, the idea that such high rise buildings within existing residential areas is acceptable is nonsense and appears to be a theoretical concept not rooted in the reality of the effects that would be caused. Even 3 level buildings of 12m will have detrimental effects and tighter planning and consenting rules around these should be incorporated into the Plan change.</p> <p>There are alternatives to excessive height for increasing density - the obvious example being terraced housing that is ubiquitous in the UK and elsewhere. I note that various developments in Stoke employ terraced 2 storey housing.</p> | <p>With regard to rule REr.19J - amend maximum permitted building height from 19.5 metres down to a maximum of 12 or lower that would accommodate a 3 level residential building. Even then, a 3 level residential building should be subject to resource consent and require that there be no deleterious effects on neighbouring properties in terms of daylight, visual amenity, etc.</p> |

# Online submission

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

|                           |                                                                             |
|---------------------------|-----------------------------------------------------------------------------|
| Submitter No.             | S373                                                                        |
| Submitter Name            | Samuel Ng                                                                   |
| Submitter first name      | Samuel                                                                      |
| Submitter middle name     | Shoong Chi                                                                  |
| Submitter surname         | Ng                                                                          |
| Submitter is contact      | Yes                                                                         |
| Email                     | <a href="mailto:subs@samng.com">subs@samng.com</a>                          |
| Wish to be heard          | No                                                                          |
| Joint presentation        | No                                                                          |
| Trade competition         | I could not gain an advantage in trade competition through this submission. |
| Directly affected         | N/A                                                                         |
| Withhold contact details? | No                                                                          |

## Submission points

| Plan section       | Provision          | Support/oppose | Reasons | Decision Sought                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------|--------------------|----------------|---------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Entire Plan Change | General opposition | Oppose         |         | We urge the Nelson City Council to revoke Plan29 and favour a longer, more community-centric engagement process to address housing affordability in Nelson comprehensively <b>based on objective evidence of population growth, including the residential preferences of the growing population.</b> We believe a collaborative approach, where the community is actively involved in decision-making, will lead to more sustainable and accepted housing solutions. |

I am not opposed to intensification. Indeed, it is essential to introduce more housing options in specific areas of our city to prevent urban continually expanding population. My support for intensification stems from a desire for well-planned, sustainable growth that harmonize fabric. That said, here are the reasons for my objection to Plan29 in its current form.

#### Shading and Privacy Concerns:

I object to the shading and privacy concerns arising from the proposed housing intensification under Plan Change 29 as it poses a threat to residents. The potential blockage of sunlight due to taller developments can significantly affect the well-being, comfort, and energy efficiency also potentially diminishing property values (see below for all references). Additionally, the lack of privacy from closely built high-rise build intrusion and loss of personal space, undermining the serene and community-centered character that currently defines our neighborhood daylight angles have been amended, for the worse, with little notification for those affected. Specific examples from other parts of New Zealand

Sunlight Impact: Proposals for six-story developments in Auckland have raised shading concerns, potentially blocking sunlight for neighboring properties.  
Generic Rules: Criticism in Christchurch highlights a lack of consideration for different neighborhood characteristics in housing intensification shading and privacy.

Poor Design: Poorly designed apartments in Auckland have been associated with housing intensification drawbacks, likely compromising sub-standard conditions.  
Sub-standard Conditions: High-density housing in New Zealand may lead to sub-standard living conditions, encompassing shading and privacy. In Christchurch, there have been concerns regarding suburban apartments reaching 12 meters in height affecting sunlight, privacy, and local residents' quality of life<sup>1</sup>. Moreover, a cost-benefit analysis by PwC for the government highlighted the impact on sunlight and views under which potentially can degrade the living standards of the neighborhood.

#### Need for Sustainable Intensification:

An inclusive approach towards housing intensification, considering the diverse needs and concerns of the community, can lead to more successful case of Lower Hutt's Plan Change 43, which resulted in a surge of infill housing, is an example of government-imposed intensification that community's needs or preferences.

#### Community Engagement:

The lack of community engagement in Plan Change 29 (PC29) is a significant concern as it implies a top-down approach to urban planning the voices and insights of the residents who will be directly impacted by these changes. This deficiency in engagement could lead to decisions collective aspirations or address the concerns of the community, hence undermining the social cohesion and shared vision for the neighborhood mainly due to this insufficient community engagement, which risks overlooking crucial factors such as shading and privacy concerns, and on the existing communities. The absence of a robust community-centric dialogue and the apparent hastiness in pushing through with PC understanding of its long-term implications on the residents and the city's character is deeply troubling. This lack of engagement undermines the principle of inclusive urban development, which are essential for creating harmonious, sustainable, and livable urban spaces.

#### Inadequate Publicity and Notification:

The ramifications of the proposed changes under Plan Change 29 (PC29) are extensive, poised to alter the fabric of Nelson's communities substantial impact, there has not been sufficient publicity to ensure that residents are adequately informed. I often receive detailed notices affecting my property, such as utility repairs. However, I haven't received any targeted information regarding the impending significant changes under PC29.

#### Complexity of Online Documents and Short Consultation Period:

The documents pertaining to PC29, available online, present a challenge in comprehension, and the consultation timeframe provided is in the proposed changes. The steep learning curve to understand the intricacies of the plan, coupled with a brief consultation window, inhibits engagement and informed feedback.

#### Inconsistencies with Previous Proposals:

There appears to be a divergence between previously proposed frameworks for Nelson's growth and what PC29 puts forth. For instance, we envisioned medium density zoning with a building height of up to 11m in areas now designated as "high density" under PC29 with a proposal it causes confusion. These inconsistencies not only create misunderstanding but also cast doubt on the coherence of the planning process.

#### Ambiguity and Miscommunication:

The general publicity surrounding the draft Nelson Plan and the Future Development Strategy for Nelson was ambiguous, especially concerning "Centre" and its implications. Residing in a low-rise, green residential area, I was under the impression that the intensification wouldn't affect broad terms and the lack of clarity in delineating areas subjected to intensification makes it exceedingly challenging for anyone without a planning or the Resource Management Act to grasp the full scope of what is being proposed. My awareness of these changes only came from another individual impacted by the plan changes, underscoring the inadequacy of the communication strategy surrounding PC29.

#### Preservation of Amenity Values:

Nelson's population growth necessitates an increase in housing density, particularly in the inner city. I am not opposed to the idea of high density within the central city precincts, where commercial and other high-rise buildings already exist. However, extending such high-rise developments neighborhoods, especially without the requisite resource consents, is a proposition I find hard to support. There are alternatives to achieve as two-story apartments and subdivided sections for lower-level builds, which would align with the community's character and respect the

#### Suitable Progression vs Drastic Transformation:

The blocks extending from Nile Street to Nelson College, bordered by Rutherford and Collingwood Streets, predominantly feature older, well-homes and low-rise structures. These zones embody a close-knit community fabric, which has been especially evident during challenging and civil defence emergencies. A sudden transformation to high-rise developments would not only alter the aesthetic appeal but potentially has long been nurtured in these neighborhoods.

#### Preserving Regional Town Characteristics:

Many residents, myself included, have opted to live in this region to enjoy the benefits and charm of a smaller, regional town. The opportunity enveloped by greenery and open spaces, away from the bustling urban environment typical of larger cities, is a choice we made conscious over existing family homes would significantly detract from the unique atmosphere and potentially impair the quality of life for the current

#### Potential Uneven Development and 'Lottery Effect' on Amenity:

Information available suggests that while Plan Change 29 enables a significant capacity for high-density developments, the actual uptake to be minimal over the next 30 years due to various constraints. This disparity hints at a potential 'lottery effect,' where only a few neighborhoods changes, resulting in an uneven appearance with high-rise apartments overshadowing neighboring yards, while the majority remain unaffected transformation could lead to a dissonance in community aesthetics and overall amenity values.

### Congestion and Parking Woes

High-rise developments typically bring about an increase in traffic congestion and parking dilemmas. The absence of mandatory vehicle a plan is concerning. Although the aspiration might be for residents in high-density areas to limit car usage, the reality of our city's structure most households for daily errands like grocery shopping, commuting to work, or engaging in recreational activities around Nelson. Given transport system to cater to everyone's needs, the limited parking provisions within these new developments could lead to overcrowded s inconvenience both existing residents and newcomers but also pose safety risks for pedestrians, cyclists, and young children navigating th

### Insufficient Infrastructure Provisions:

While the Council may have conducted some infrastructural analysis, the proposed rezoning for high-density areas is likely to exert signifi The infrastructure, encompassing roads, utilities, and public services, was designed with a certain population density in mind, typically acc developments. The utilities, many of which are aged, already face challenges catering to the current population density. A notable uptick i could overstretch these resources, adversely affecting the quality of life for residents. Particularly, neighborhoods around the lower Gramp water damage during heavy rains, with the existing drainage system often failing to cope.

### Upgraded Infrastructure Requirement:

The transformation towards high-density living necessitates a parallel upgrade in infrastructure to maintain, if not enhance, the quality of ensures the readiness and resilience of infrastructure before advancing with such ambitious zoning changes. Rezoning without a compreh could leave communities grappling with avoidable challenges.

### Holistic Planning for Sustainable Development:

A holistic approach that encompasses not only housing but also the requisite infrastructural upgrades and traffic management solutions is development. The vision for a denser Nelson should be coupled with robust planning to mitigate the associated challenges of congestion rounded plan that addresses these concerns while promoting housing development is likely to garner more support and ensure a smooth housing goals outlined in PC29.

### References:

1. <https://www.nzherald.co.nz/nz/editorial-housing-intensification-will-throw-shade-on-new-councils/NZZ3CTRFO7IN62FIAZNVGHW4Y/#:~:text=Editorial%3A%20Housing%20intensification%20will%20throw,minute>
2. <https://www.nzherald.co.nz/nz/opinion-lianne-dalziel-on-housing-intensification-one-size-does-not-fit-all/R2YHKCAZ4VPMQVRVOINES74NXU/#:~:text=OPINION,Council%20voted%20last%20week>
3. <https://www.tandfonline.com/doi/abs/10.1080/02673037.2011.542096#:~:text=In%20a%20study%20carried%20out,inside%20apartment%>
4. <https://www.stuff.co.nz/life-style/homed/residential/120061792/high-density-housing-has-its-place#:~:text=High%20density%20housing%20has%20a,standard%20living%20conditions>
5. <https://www.rnz.co.nz/news/national/456049/what-is-the-price-of-sunlight-householders-face-losing-over-a-billion-under-intensificatio>
6. <https://community.scoop.co.nz/2022/03/have-your-say-on-governments-housing-intensification-changes-in-lower-hutt/>

# Online submission

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

|                           |                                                                             |
|---------------------------|-----------------------------------------------------------------------------|
| Submitter No.             | S374                                                                        |
| Submitter Name            | Kathryn Ng                                                                  |
| Submitter first name      | Kathryn                                                                     |
| Submitter middle name     | Alice Louise                                                                |
| Submitter surname         | Ng                                                                          |
| Submitter is contact      | Yes                                                                         |
| Email                     | <a href="mailto:samandkaty@gmail.com">samandkaty@gmail.com</a>              |
| 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         | <p>I support the concept of intensification, recognizing its importance in providing diverse housing choices in certain city regions to counteract urban sprawl and cater to our growing population. However, I have concerns regarding the present iteration of Plan 29, which I outline in my attached submission. This submission has not been created to respond point by point to Plan 29, and I seek the right to respond to each point in future iterations of consultation, should the need arise. Instead, my submission highlights broad and pressing concerns for the council to consider when weighing community feedback - not least the fact that many many more Nelsonians would be mobilised in response to this Plan change if they had been meaningfully engaged. I hope that you approach the submission feedback with an attitude of collaboration.</p> | <p>We request a meaningful community-focused engagement process on Plan 29, with transparency and information sharing. This approach should discuss Nelson's housing stock and affordability in the context of the broader vision for the region and grounded in factual data on population growth and the housing preferences of our expanding community. It should have strong emphasis on protecting what makes Nelson Nelson - its communities.</p> |

# Documents included with submission

|               |                                            |
|---------------|--------------------------------------------|
| Document name | PLAN 29 SUBMISSION IN FULL - KATHRYN NG    |
| File          | <a href="#">plan29submissionkateng.pdf</a> |
| Description   | Please find attached my submission         |

## PLAN 29 SUBMISSION - NELSON CITY COUNCIL

Kate Ng

### Submission Details:

- Plan Change Number: 29
- Opposition to Plan Change 29 in its current form

### Submission summary:

- I agree with the need to provide increased housing for current and future Nelsonians.
- Many other people would be feeding back, if consultation was easier.
- We need to have confidence that you are advocating for our needs nationally.
- Nelson's communities and it's regional charm must be preserved.

### **\*\*\* The need for affordable housing is not in dispute \*\*\***

Many of the submissions that you will receive will highlight the negative things about intensification - infrastructural readiness, daylight provisions, privacy, social impact etc. That is because Plan 29 is taking from Nelsonians what we have assumed we have the right to - rights that are normally protected by resource consent - sun and privacy.

But many of those same Nelsonians are equally concerned with the plight of those who don't have access to affordable housing. We realise that there will be increased pressure on housing as the population increases. We also aspire to a society where people are not forced to live in a van or on the street or in temporary or overcrowded housing.

The issue with Plan 29 is:

- The way the consultation has been undertaken - breeding distrust.
- The assumptions on which it is founded, which are not transparent.
- The forecasts you have for the future, which we don't necessarily own.
- And the single option set out for resolving housing challenges - intensification.

The need for affordable housing is not in dispute. But if we are to come on board in support of initiatives we need to know:

- what the council has learned from other councils and options inside and outside of NZ
- other housing options that are being explored or implemented alongside this, especially as intensification feels like it is a long lead time to an immediate and pressing need (see Annex A for ChatGPT's ideas)

- the basis for the future forecasts and how the council will respond to concerns raised.

I **recommend** that:

- council respond to the above questions directly, making it easy for residents to come up to speed with current thinking to be meaningfully consulted and engaged.

### \*\*\* The consultation process has been a barrier to engagement \*\*\*

Plan 29 took many Nelsonians by surprise. But what is even more concerning is that the essence of Plan 29 is set out in the Future Development Strategy, a document that was consulted on in April 2022. At a well-attended community meeting, only a handful of people appeared to be aware of that. This is extremely concerning.

Council mechanisms for connecting with the Nelson community are clearly blunt. Nelson residents are better informed about roadworks than a rule change that may result in a multi-storey building next door. This needs to change.

I **recommend** that you:

1. **research** how other councils, both within and outside NZ, engage effectively with their community and use that to have a conversation with the Nelson community about effective engagement.
2. **factor in** that interest in Plan 29 stretches well beyond the number of submissions you receive. There are still many residents who are completely unaware or are impeded by hurdles in the submission process.

### \*\*\* We need greater transparency to give quality feedback \*\*\*

At the well-attended consultation meeting, a question was posed to which Mayor Nick Smith said he would not 'break the law'. That's heartening, however I don't believe the person asking the question was asking him to break the law - he was asking Nick to advocate for Nelson's needs nationally.

In 2021, when the NZ Government passed the Enabling Housing Supply and Other Matters Amendment Act Bill on which the Future Development Strategy is based, [Lower Hutt Council stood in opposition to the bill](#). Nelson needs to be up with the game and doing the same.

Equally, as Nelson engaged with regional councils to create the Future Development Strategy, it needed to be across all aspects from population growth rate projections to social impact assessments to climate projects to infrastructural requirements to future forecasts. Were we?

Nelson City Council processes and information are not transparent enough to give us confidence that the advice and input Nelson is receiving and drawing upon is sound. Valid questions were raised at the consultation meeting about daylight hours, sea level projections for The Wood, population growth estimates, infrastructural considerations, what other councils are doing, and future visions for Nelson, to name a few.

In the Future Development Strategy, it suggests that in the short term Council is anticipating a low rate of growth, with an additional 1,256 rating units from 2021 to 2031. With the proliferation of AI, over the next 5-years, employment is likely to look incredibly different. Are we certain that a high level of growth is on the horizon?

Residents are expected to provide consultation feedback on documents that assume all Council projections and considerations are fact. Yet we are very aware that there are a number of future's forecast by climate and data scientists. These huge decisions that impact our streets and neighbourhoods are being based on them.

How can we give full feedback if we don't have full information?

I **recommend** that you:

3. **give** residents greater transparency around the information and assumptions on which Plan 29 is based.
4. **ensure** that you are sufficiently staffed to bring Nelson's voice into the national consultation.
5. add a layer of flexibility into future plans, recognising that things are fluid.

### \*\*\* We need to preserve what makes Nelson special \*\*\*

The strong reaction Council is receiving in response to Plan 29 is not just from property owners trying to safeguard their investment. It is a genuine concern about the impact of this plan on Nelson.

1. *Nelson IS its communities* - we chose Nelson over more practical places to live because we wish our children to float between neighbours houses; because we want to be the cheery smile for the elderly gentleman on our street; or to start WhatsApp groups when our street goes into lockdown. When Nelson city Carols by Candlelight was canceled, a collection of neighbours met at the rotunda in Fairfield park. When lockdown created tedium, we had letterbox decoration competitions and wrote Haikus outside of our houses with chalk. When a cat was killed during roadworks on our street, neighbours poured out sympathy and advocated to keep our animals and children safe. This is a community and it is why people choose to live here. The type of intensification being suggested is very likely to undermine this community.
2. *Preserving Nelson's charm* - the benefits and charm of a smaller, regional town are one of the compelling draw cards for migration to Nelson and brings in droves of tourists. The greenery and open spaces, away from the bustling urban environment typical of larger cities, makes Nelson special. High-rise

buildings towering over existing family homes would significantly detract from this. Less tourists means less income into the city. Done poorly, intensification could be a death knell to our city.

We would like to preserve what makes Nelson great. Having a hotch potch of six-storey apartments scattered across residential areas will not do that.

I **recommend** that you:

1. recognise that Nelson's charm is its neighbourhoods.
2. limit intensification to the commercial city-centre

### \*\*\* Flaws with Plan 29 in it's existing form \*\*\*

In its current form, Plan 29 feels like a knee-jerk reaction. Single level communities with lots of character and charm are suddenly allowed to have 6-storey buildings simply because they are accessible to our tiny 'city'. Privacy and sunlight restrictions, which are normally consented, are deemed unimportant relative to the flexibility to create 6-stored structures for a demographic we don't even fully understand.

Plan 29 raises serious questions, including:

1. **Infrastructural challenges:** The proposed rezoning for high-density areas is likely to exert additional pressure on existing facilities, some already struggling. Roads, utilities, parking, public services, even schools and our new hospital are designed with a certain population density in mind. Is this being considered in parallel, because we are not privy to that information.
2. **Social impact:** Intensification without a proactive strategy, is likely to erode our greatest asset here - our communities. This would be further compounded if additional accommodation became used for holiday accommodations. Again, we are not privy to social impact strategy or any rules being considered for the regulation of holiday accommodations.
3. **Building requirements:** The discarding of privacy and sunlight constraints to building raises questions of what other restrictions are being eased? Are we going to be living next door to poorly designed dwellings with no noise proofing that are vulnerable to earthquakes?
4. **Energy efficiency:** Melbourne residents received heavy subsidies to go solar. By contrast, it is proposed that Nelsonians don't even have access to sun while inside their own homes. The shadows of multi-storey buildings are going to rule out lots of solar options into the future. This does not feel future friendly.
5. **Protecting Privacy** - family neighbourhoods will feel less safe with the invasion of privacy that is possible with a multi-storey building next door. It is not a right of a homeowner to have their toddler play naked in a paddling pool without worrying who is watching them, but it is something being lost nonetheless.
6. **Future projections** - as alluded to above, the future is going to be rapidly changing in the next 5-years as artificial intelligence rewrites how and where we work. Added to that, there is a trend overseas where retail precincts are

slowly dying as online shopping and megastores take over. The assumptions on which this plan is based is that we should intensify in areas that are walking distance to Nelson city, however is that really necessary:

- a. Places like Christchurch have a centre and then multiple well-serviced suburbs, like Riccarton, Addington etc. Why not have better amenities in Tahunanui, Atawhai, by Mitre 10 etc etc.
- b. Melbourne has created a flat fee for train rides into the city, even if you live an hour away. This allows people to access affordable housing AND work in the city without creating congestion or environmental challenges.
- c. We are assuming there IS a city centre that people are drawn to. But if my recent trip to the US is anything to show by, the enduring shops in provincial city centres are more about eating options than employment. This is especially.
- d. Additionally climate projections mean that there is not high density proposed in The Wood. However it's not clear whether these projections are founded or whether other options for managing sea level rises have been considered e.g. sea barriers.

### **\*\*\* Some residents will be disproportionately impacted \*\*\***

This needs to be said. Should a homeowner be unlucky enough to have a multi-storey building erected next door, they will face a significant erosion of their property value. This feels immensely unfair, especially as it may be their only source of wealth.

Equally, whole neighbourhoods may have an immediate reduction in their value because of the potential of someone building out next door with no daylight provisions and limited privacy. It feels like an unlucky lottery.

### **Summary:**

I am not opposed to the idea of higher-rise developments (4-6 stories) within the central city precincts, where commercial and other high-rise buildings already exist. However, extending such high-rise developments into existing family-centric neighborhoods, especially without the requisite resource consents, should not be taking place.

### **Decision Request:**

- We urge the Nelson City Council to revoke Plan29 and favor a longer, more community-centric engagement process to address housing affordability in Nelson comprehensively based on objective evidence of population growth, including the residential preferences of the growing population. We believe a collaborative

approach, where the community is actively involved in decision-making, will lead to more sustainable and accepted housing solutions.

**Public Hearing:**

- Yes, I do wish to speak in support of my submission at a public hearing.

**Trade Competition:**

- No, I will not gain an advantage in trade competition through this submission.

# Online submission

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

|                                  |                                                                             |
|----------------------------------|-----------------------------------------------------------------------------|
| <b>Submitter No.</b>             | S375                                                                        |
| <b>Submitter Name</b>            | Timothy Vincent                                                             |
| <b>Submitter first name</b>      | Timothy                                                                     |
| <b>Submitter middle name</b>     | Scott                                                                       |
| <b>Submitter surname</b>         | Vincent                                                                     |
| <b>Submitter is contact</b>      | Yes                                                                         |
| <b>Email</b>                     | <a href="mailto:timvincent76@gmail.com">timvincent76@gmail.com</a>          |
| <b>Wish to be heard</b>          | No                                                                          |
| <b>Joint presentation</b>        | No                                                                          |
| <b>Trade competition</b>         | I could not gain an advantage in trade competition through this submission. |
| <b>Directly affected</b>         | N/A                                                                         |
| <b>Withhold contact details?</b> | No                                                                          |

## Submission points

| Plan section      | Provision                     | Support/oppose | Reasons                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Decision sought                                     |
|-------------------|-------------------------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|
| Residential Zones | High Density Residential Zone | Amend          | <p>Allowing six stories means the cost/loss of amenity of living in the shadow of a six story building will be pushed unfairly onto the small number of unfortunate residents that happen to live in the shadow of a site that is developed.</p> <p>The FAQ page gives the example of 15% intensification over 30 years, if that's evenly spit between infill, apartment and terraced housing that means 5% of residents will live in the shadow of an apartment building. That's profoundly unfair that the plan change will result in that outcome for 5% of people living in the newly zoned areas. It's not a nice outcome.</p> <p>A much better option would be to allow intensification with two-story buildings. I've seen examples of that in Christchurch where they fit two or three or four two-story units onto a site. It's relatively high density and doesn't result in massive negative results on the neighbours.</p> <p>The Green Gables site at the east end of Bridge St is a great local example. That has been developed with a new two story building which has next to no effect on the neighbours amenity. Compare that with how it might look with a six story building if that were allowed (very roughly mocked up and not to scale, intended for illustration purposes only).</p> <p>It's Russian Roulette for residents whether a developer builds and blocks out their sunshine, and the costs will be disproportionately and unfairly borne by an unlucky few. Amending the plan to allow two story units will still allow for a massive increase in living density from current levels and with less of the cost externalised to the poor neighbours.</p> | Reduce the allowable height from six stories to two |

## Documents included with submission

**Document name** Bridge St 2009

**File** [bridgest2009.jpg](#)

**Description** The east end of Bridge Street in 2009

**Document name** Bridge St 2022

**File** [bridgest2022.jpg](#)

**Description** The east end of Bridge Street now with a new two-story building

**Document name** Bridge St Intensive

**File** [bridgestintensive.jpg](#)

**Description** How the east end of Bridge St could look if a six story building was built instead





Bridge Street



252 Bridge St

Nelson

Google Street View

Sep 2022

See latest date





251 Bridge St

Nelson

Google Street View

Dec 2009

See latest date

Dec 2009

Aug 2017

Aug 2018

Jul 2019

Aug 2020

Sep 2022



# Online submission

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

|                           |                                                                             |
|---------------------------|-----------------------------------------------------------------------------|
| Submitter No.             | S376                                                                        |
| Submitter Name            | Trevor James                                                                |
| Submitter first name      | Trevor                                                                      |
| Submitter middle name     | Ivan                                                                        |
| Submitter surname         | James                                                                       |
| Submitter is contact      | Yes                                                                         |
| Email                     | <a href="mailto:gwynfaniwa@slingshot.co.nz">gwynfaniwa@slingshot.co.nz</a>  |
| Wish to be heard          | Yes                                                                         |
| Joint presentation        | Yes                                                                         |
| Trade competition         | I could not gain an advantage in trade competition through this submission. |
| Directly affected         | N/A                                                                         |
| Withhold contact details? | No                                                                          |

## Submission points

| Plan section       | Provision       | Support/oppose | Reasons | Decision sought                                                                                                          |
|--------------------|-----------------|----------------|---------|--------------------------------------------------------------------------------------------------------------------------|
| Entire Plan Change | General support | Support        |         | Allow for medium and high density zones, but ensure that there are neighbourhood plans to get the detailed design right. |

We have enjoyed visiting for extended periods in cities in Europe and Scandinavia that have built using a more dense and sustainable model. If done right we believe the 3-6 story apartments are very attractive and very 'livable'. Done right, shops, public transport, pools, parks and other amenities can be within a short walking distance. Often this can mean that friends and family can be closer. Ideally if this is done well it leaves more room for nature.

The primary reasons for us submitting are that the current model of urban growth is unsustainable and leads to inefficient servicing, environmental degradation and wasteful of productive land. The current model is driven by our society's demand for using motor vehicles. Our specific concerns about the current situation is:

- Impervious surface. In our current urban areas there is a large amount of tarsealed road/driveway, roof and concrete surface covering our land. This essentially creates 'dead' surfaces on our planet that relies on living surfaces that create resilience e.g. the natural cycles of carbon and water. It is also important that rainfall recharges our aquifers so that the many streams that are fed by groundwater are allowed to flourish. The proposed rule requiring 20% permeable surface for a development site is probably about right, but it would be good to create incentive to provide more and to put some stormwater onto these surfaces.
- Limited green space for nature. While we understand that this is outside the scope of this plan change there is likely to be a need to 'balance' higher density housing with more space for nature. This means that we can better live in harmony with nature. This is particularly true for our stream ecosystems that need space to function properly i.e. flood flows over well-controlled secondary flow paths provide relief to the stream from erosion/scour, but also help keep the stream clean as the silt deposits onto grassy flood plains. Green spaces can also be corridors for bird life and provide for necessary carbon sequestration. Green space in towns and cities is proven to be beneficial for people's health and mental wellbeing. This could all be worked through with Neighbourhood Plans.

- Unsustainable transportation. With sprawling, low density urban areas and low usage of public transport mean the vehicle kilometers travelled per person is greater and therefore the pollution we create from vehicles is high. It is not only the carbon emissions, but discharges to water from the wearing of tyres and brake linings. Neighbourhood Plans should consider the integration of intensive 'hubs' with transportation routes.
- High Costs and low efficiency. Pipework and pumping systems for drinking water, wastewater and stormwater is more expensive the more spread out and less dense the developments are. Public transport is also less efficient and costly as urban areas spread out in many directions.
- Limited housing options. There need to be more smaller housing options for example for single people, young couples and older folk.
- Pressure on productive land and to reduce space for nature in rural areas. We only have limited land and taking up more of that land for non-productive urban space, it means the pressure comes on existing rural landscapes to be more intensive and that can often mean reducing spaces for nature and more pollution, particularly to waterways.
- More variety permitted in dwelling eg spaces created for tiny house villages

We like this plan as it addresses these problems.

While we support this plan change, any intensification needs to be designed well. This means that multi-story buildings should integrate well with the landscape (topography, streams etc), have green space around them, provide privacy and avoid shading other dwellings too much. All this needs to be addressed in comprehensive Neighbourhood Plans.

# Online submission

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

|                           |                                                                             |
|---------------------------|-----------------------------------------------------------------------------|
| Submitter No.             | S377                                                                        |
| Submitter Name            | Myfanwy James                                                               |
| Submitter first name      | Myfanwy                                                                     |
| Submitter middle name     | Iona                                                                        |
| Submitter surname         | James                                                                       |
| Submitter is contact      | Yes                                                                         |
| Email                     | <a href="mailto:gwynfaniwa@gmail.com">gwynfaniwa@gmail.com</a>              |
| 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 | Support        |         | While we support this plan change, any intensification needs to be designed well. This means that multi-story buildings should integrate well with the landscape (topography, streams etc), have green space around them, provide privacy and avoid shading other dwellings too much. All this needs to be addressed in comprehensive Neighbourhood Plans. |

We have enjoyed visiting for extended periods in cities in Europe and Scandinavia that have built using a more dense and sustainable model. If done right we believe the 3-6 story apartments are very attractive and very 'livable'. Done right, shops, public transport, pools, parks and other amenities can be within a short walking distance. Often this can mean that friends and family can be closer. Ideally if this is done well it leaves more room for nature.

The primary reasons for us submitting are that the current model of urban growth is unsustainable and leads to inefficient servicing, environmental degradation and wasteful use of productive land. The current model is driven by our society's demand for using motor vehicles. Our specific concerns about the current situation is:

- Impervious surface. In our current urban areas there is a large amount of tarsealed road/driveway, roof and concrete surface covering our land. This essentially creates 'dead' surfaces on our planet that relies on living surfaces that create resilience e.g. the natural cycles of carbon and water. It is also important that rainfall recharges our aquifers so that the many streams that are fed by groundwater are allowed to flourish. The proposed rule requiring 20% permeable surface for a development site is probably about right, but it would be good to create incentive to provide more and to put some stormwater onto these surfaces.

- Limited green space for nature. While we understand

that this is outside the scope of this plan change there is likely to be a need to 'balance' higher density housing with more space for nature. This means that we can better live in harmony with nature. This is particularly true for our stream ecosystems that need space to function properly i.e. flood flows over well-controlled secondary flow paths provide relief to the stream from erosion/scour, but also help keep the stream clean as the silt deposits onto grassy flood plains. Green spaces can also be corridors for bird life and provide for necessary carbon sequestration. Green space in towns and cities is proven to be beneficial for people's health and mental wellbeing. This could all be worked through with Neighbourhood Plans.

- Unsustainable transportation. With sprawling, low density urban areas and low usage of public transport mean the vehicle kilometers travelled per person is greater and therefore the pollution we create from vehicles is high. It is not only the carbon emissions, but discharges to water from the wearing of tyres and brake linings. Neighbourhood Plans should consider the integration of intensive 'hubs' with transportation routes.

- High Costs and low efficiency. Pipework and pumping systems for drinking water, wastewater and stormwater is more expensive the more spread out and less dense the developments are. Public transport is also less efficient and costly as urban areas spread out in many directions.

- Limited housing options. There need to be more smaller housing options for example for single people, young couples and older folk

couples and older folk.

- Pressure on productive land and to reduce space for nature in rural areas. We only have limited land and taking up more of that land for non-productive urban space, it means the pressure comes on existing rural landscapes to be more intensive and that can often mean reducing spaces for nature and more pollution, particularly to waterways.
- More variety permitted in dwelling eg spaces created for tiny house villages

We like this plan as it addresses these problems.

While we support this plan change, any intensification needs to be designed well. This means that multi-story buildings should integrate well with the landscape (topography, streams etc), have green space around them, provide privacy and avoid shading other dwellings too much. All this needs to be addressed in comprehensive Neighbourhood Plans.

## PLAN CHANGE 29 – SEYMOUR AVENUE RESIDENTS SUBMISSION

24 October 2023

Please accept this submission from residents of the Seymour Avenue Heritage Precinct on the heritage provisions of Plan Change 29.

The residents of the Seymour Avenue Heritage Precinct could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that this submission relates to, and the submissions, are set out in **Schedule 1** and below. We **oppose** Proposed Plan Change 29 in relation to Seymour Avenue and surrounds.

The residents of the Seymour Avenue Heritage Precinct seek that the Nelson City Council make the decisions set out in Schedule 1 and below. Where changes are proposed, further consequential amendments may be required. Alternative relief securing the same outcomes could be granted.

Where the submission is to support a provision, the relief sought is that the provision be retained. Where no reasons are given for a submission, it is because:

- i. The reason is self-evident
- ii. The proposal is the most appropriate option, consistent with s 32 of the Resource Management Act 1991 (RMA); or
- iii. The submission accords with the purpose of the RMA.





*DI3 – The Guidelines are concerned primarily with the streetscape and the appearance of the buildings from the street.*

- 1.4 Key elements of the Design Guide include:

*SA3.1 Height*

*Houses are generally single storey which enhances the openness of the street.*

*SA4.3 New Buildings*

- a) shall be designed in such a way as to enhance, complement and be sympathetic to the existing streetscape;*
- b) the form and scale of the new work shall be in keeping with the existing houses when viewed from the street;*
- e) houses shall be generally single storey although lofts within the roof spaces may be allowed where they do not penetrate the roof envelope when viewed from the street;*
- g) roof lines shall follow the form of existing houses*

- 1.5 We value and respect our historic heritage and spend considerable time and resource ensuring the character of the street is preserved and enhanced. Details are provided in Appendix 1 – **Seymour Avenue Heritage Precinct Historic Context**.

## **2. Proposed Planning Context**

- 2.1 Plan Change 29 (PC29) proposes to zone most of Seymour Avenue as a Medium Density Residential Zone (MDZ) which allows for up to three dwellings of up to three stories on a single site.

- 2.2 The Nelson City Council website preamble<sup>2</sup> to Plan Change 29 states:

*The main objective of the Plan Change is to amend the Nelson Regional Management Plan (NRMP) to implement the NPS-UD by supporting housing delivery and the provision of well-functioning urban environments within Nelson while ensuring that natural hazard risks are appropriately managed **and historic heritage is protected**. (emphasis added).*

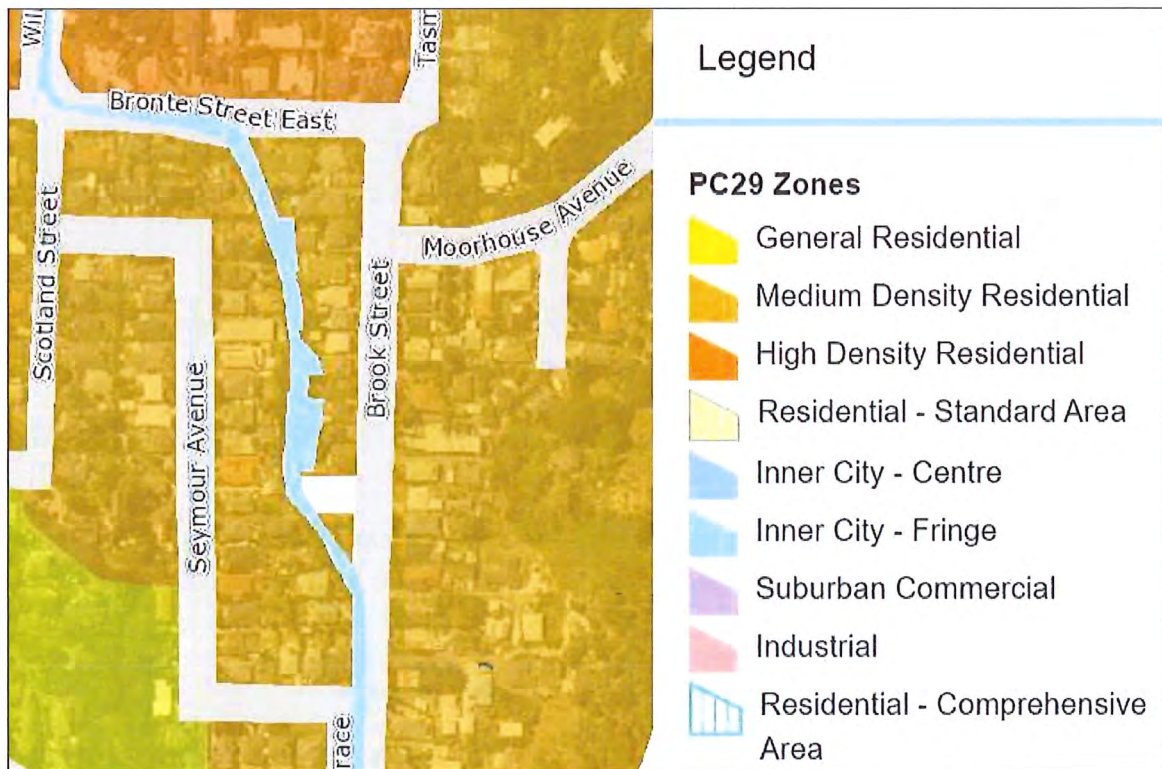
- 2.3 The Council report<sup>3</sup> states (at paragraph 4.2)

*Proposed PC29 also ensures that Council's obligations under Section 6 'matters of national importance' are met in relation to the update of built heritage and natural hazards provisions. (emphasis added).*

---

<sup>2</sup> <https://shape.nelson.govt.nz/plan-change-29>

<sup>3</sup> [https://hdp-au-prod-app-nels-shape-files.s3.ap-southeast-2.amazonaws.com/6416/9110/0162/Council\\_Report\\_Plan\\_Change\\_29\\_-\\_10\\_Aug\\_2023.pdf](https://hdp-au-prod-app-nels-shape-files.s3.ap-southeast-2.amazonaws.com/6416/9110/0162/Council_Report_Plan_Change_29_-_10_Aug_2023.pdf)



2.4 Historic heritage is a matter of National importance under section 6(f) of the Resource Management Act, which states that:

*In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:*

6(f): *the protection of historic heritage from inappropriate subdivision, use, and development.*

2.5 The section 32 analysis report<sup>4</sup> states:

*The purpose of the proposed amendments to the NRMP heritage provisions is to ensure they will enable the protection of historic heritage from inappropriate subdivision, use and development. (emphasis added)*

2.6 Objective DO4.1 of the NRMP states

*Retention and enhancement of heritage items that contribute to the character, heritage values, or visual amenity of Nelson, in a setting that enhances such items. This applies to heritage precincts<sup>5</sup>.*

<sup>4</sup> [https://hdp-au-prod-app-nels-shape-files.s3.ap-southeast-2.amazonaws.com/7116/9103/1197/Section\\_32\\_Evaluation\\_Report\\_Plan\\_Change\\_29.pdf](https://hdp-au-prod-app-nels-shape-files.s3.ap-southeast-2.amazonaws.com/7116/9103/1197/Section_32_Evaluation_Report_Plan_Change_29.pdf)

<sup>5</sup> Section 24.5 of the section 32 report

## *Seymour Avenue Residents Submission on NRMP Plan Change 29*

- 2.6 Zoning Seymour Avenue as a Medium Density Residential Zone (allowing up to three dwellings of up to three stories on a single site REr.18B) **does not protect** the Precincts' historic heritage, it **does not ensure** that Council's obligations have been met in this regard and **does not retain or enhance** the heritage precinct.
- 2.7 We submit that:
- 2.7.1 None of Seymour Avenue should not be zoned as a Medium Density Residential Zone.
- 2.7.2 Seymour Avenue in entirety be zoned as a General Residential Zone.



### 3. Impact of intensification and buildings adjoining a heritage precinct

- 3.1 Rule REr.18T.1 enables buildings on sites adjoining a site in a heritage precinct, or containing a heritage building or object to be permitted if the building does not exceed 8 m in height.
- 3.2 If the proposed building was to exceed 8 m in height a restricted discretionary consent is required (rule REr.18T.3). The purpose for the discretionary activity rule being states as;

*to manage development adjoining historic heritage precincts ... to ensure that their historic heritage values are protected. This will require consideration of the context of the site, its location and physical relationship with the heritage items and their setting "*

3.3 The assessment criteria (REr.18T.4) include:

- *compatibility with the form, scale, and proportions of the adjoining heritage building or precinct. This does not mean rigid adherence to the height of the heritage building or precinct, but it does require careful consideration to ensure the design is sympathetic and visually integrated.*
- *the heritage building or precinct's sensitivity to change or capacity to accommodate change without compromising its historic heritage values and setting.*
- *whether there is potential for a reduction or loss of heritage values, including the ability to interpret the heritage building or precinct, and its relationship with other heritage items.*
- *existing views of the scheduled heritage building or precinct from adjoining public places and publicly accessible areas are maintained as far as is practicable*

3.4 This means that developers can make an application for a building greater than 8 m in height (e.g. up to 3 stories) on an adjacent property. The council will be required to assess that application but there is no specific requirement for the affected neighbour/s to be notified or any transparency of the assessment of effects against the matters of discretion.

3.5 The Section 32 report<sup>6</sup> identifies the risk to heritage precincts from adjacency.

*Protecting built heritage from the impacts of housing intensification – built heritage can be undermined by development adjacent to or adjoining sites of scheduled heritage items or precincts. Housing intensification risks undermining the setting in which built heritage is located, particularly through the introduction of tall buildings that are out-of-scale with the surrounding environment. This is regardless of the extent to which individual scheduled buildings and those located within heritage precincts are themselves protected.*

3.6 Allowing buildings up to 8 metres in height as a permitted activity, or higher with resource consent does not protect the values of the heritage precinct, and particularly in the case of the Seymour Avenue heritage precinct, it's openness.

3.7 The Heritage Consultancy Services Report<sup>7</sup> brief was for consideration of the zoning proposals in the context of '*the potential impact of intensification, especially in relation to height, on scheduled heritage items and precincts*'.

3.8 The conclusions of this report are of consequence:

---

<sup>6</sup> Section 24.4 of the Section 32 report

<sup>7</sup> [https://shape.nelson.govt.nz/download\\_file/view/4926/1324](https://shape.nelson.govt.nz/download_file/view/4926/1324)

## *Seymour Avenue Residents Submission on NRMP Plan Change 29*

The NMRP's residential rules already acknowledge the potential impact of development upon heritage items and precincts. The assessment criteria for Rule REr.49 Aerials, for example, includes as an assessment criterion for installing an aerial [REr.49.4.g] 'the extent to which any heritage or cultural values of the site or adjoining sites might be compromised by the structure [emphasis added; see also REr52.4 e]. PC 29 creates a new planning context within which other potential impacts on historic heritage resources need to be considered in order to give effect to RMA s6(f).

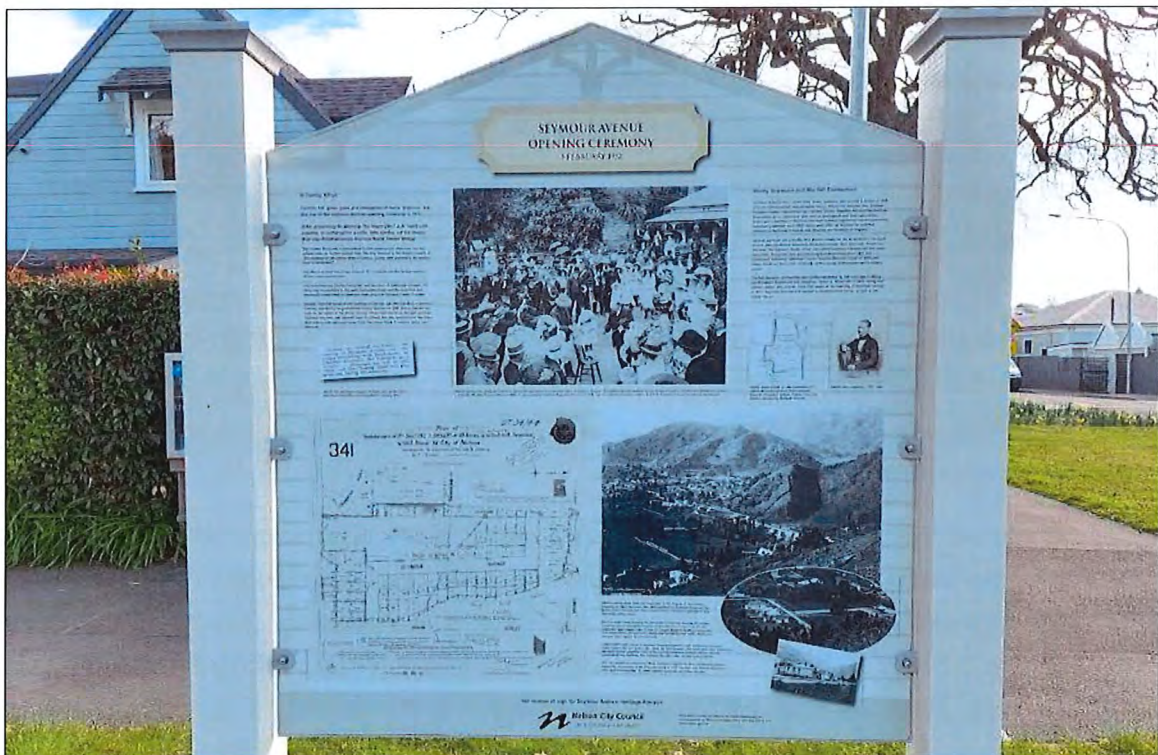
Maintaining the status quo on neighbouring properties, in terms of the current NRMP planning provisions for height and recession planes in the General Residential Zone, will help to protect scheduled heritage items and precincts from inappropriate subdivision, use and development.

3.9 The first recommendation of the report states:

1. Those properties adjoining a heritage item or precinct should be zoned GRZ in order to facilitate protection of heritage values.

3.10 This recommendation has not been followed, nor have the recommendations been addressed in the section 32 report.

3.11 The Heritage Buildings Places and Objects Assessment<sup>8</sup> details the houses on Seymour Avenue and surrounds which formed part of the Sunnyside Estate. The estate extended just beyond the current Seymour Avenue Heritage Precinct, particularly including Warwick House, which has 'contextual significance for the contribution it makes to the Seymour Avenue Heritage Precinct'.



<sup>8</sup> [https://shape.nelson.govt.nz/download\\_file/view/4928/1324](https://shape.nelson.govt.nz/download_file/view/4928/1324)

- 3.12 It is appropriate that recognition be given to Warwick House and other adjoining properties which serve that same function. The section 32 report<sup>9</sup> also states:

*Built heritage also contributes to amenity values in different ways, including by providing a visually stimulating built environment, sense of place and distinctive landmarks in the urban environment.*

- 3.11 We submit that:

- 3.11.1 Seymour Avenue in entirety should not be zoned as a Medium Density Residential Zone.
- 3.11.2 Seymour Avenue is all zoned as a General Residential Zone.
- 3.11.3 The properties adjoining the Seymour Avenue Heritage Precinct are zoned as a General Residential Zone.
- 3.11.4 Adjoining and wider properties that provide contextual significance to the Seymour Avenue Heritage Precinct be recognised and appropriately be accorded protection through a General Residential zoning.

#### 4. Heritage Buildings Places and Objects Assessment

- 4.1 Rules REr.85 – 91 provide the rule set of activities within a heritage precinct.
- 4.2 Applications can be considered for new buildings on the site of a heritage item as a non-notified activity (REr.89) and assessment also includes reference to the Design Guide. Group B houses can be demolished as a discretionary activity under REr.91 with no reference to Heritage Precinct values.
- 4.3 While there are protections within the proposed plan, there is potential for these protections to be eroded by virtue of resource consent applications to demolish/alter Group B buildings, as well as for applications to be made for medium density housing on adjacent properties and within the heritage precinct.
- 4.4 The Section 32 report recognises that built heritage is a finite resource. Providing a balance for those residing in heritage precincts while enabling the heritage precinct to contribute to the quality of the physical environment and our understanding of the past is an important balance.
- 4.5 While we support the heritage precinct, we also are well aware of the consequences of climate change and natural hazards. The proposed plan does not consider or provide for *force majeure* and the burden this would place on owners of properties in the heritage precinct to rebuild in accordance with the rule set of the heritage precinct. This should be recognised and an additional rule inserted in the plan for the heritage precinct rules

---

<sup>9</sup> Section 24.4 of the section 32 report

to not apply in the event that XX% of dwellings in the heritage precinct have been substantially damaged/destroyed by a *force majeure* event.

4.6 We submit that:

Rules REr.85 – 91 provide an appropriate rule set for activities within a heritage precinct, with an amendment to provide for non-compliance or a waiving of the need to obtain consent for activities in response to force majeure events (as described above).

## 5. Urban Design Considerations

- 5.1 Appendix 3A of the section 32 report is the Urban Design Considerations Memo<sup>10</sup>. It notes that the housing intensity zones have been developed on the basis of walking catchments.



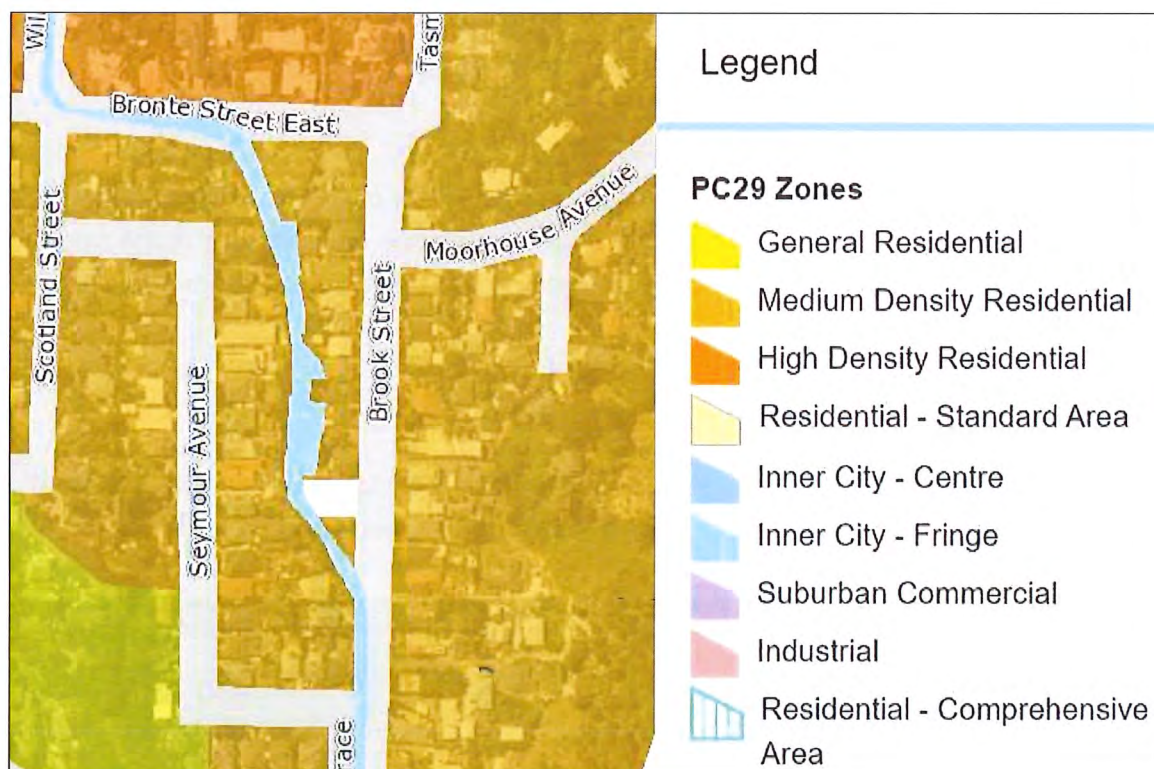
*Walking catchments (also referred to as pedestrian catchments) represent the distance that people can walk over a given time period. ... the use of walking catchments as a key metric in understanding the level of accessibility for any given area has been utilised for this work.*

- 5.2 Apart from consideration of natural hazards and accessibility, no other values have been considered in the spatial extent of the proposed housing intensity zones.
- 5.3 The Urban Design Considerations memo further contends that zone boundaries should be developed using fixed physical features to provide a transition/buffer between areas of lower intensity zones. The report also advocated for the avoidance of split zoning across blocks to:

*to minimise potential interface effects with lower intensity zones ... and maximise development efficiency gains via site amalgamation.*

- 5.4 This has not been achieved in Seymour Avenue where part of the street is zoned as Medium Density Residential and part as General Residential.

<sup>10</sup> [https://shape.nelson.govt.nz/download\\_file/view/4915/1324](https://shape.nelson.govt.nz/download_file/view/4915/1324)



5.5 We submit that:

5.5.1 Seymour Avenue should be considered within the context of transition/buffers due to its heritage status.

5.5.2 Seymour Avenue should all be zoned as General Residential

## 6. RMA s32 Analysis

6.1 The RMA s32 Analysis<sup>11</sup> report does not adequately identify, or consequently assess the efficiency or effectiveness of, the reasonably practicable option of zoning the Seymour Avenue Heritage Precinct and adjoining properties as General Residential Zone, despite this being a key recommendation in the Heritage Consultancy Services Report.

6.2 The s32 analysis does not even set out why that option was not considered. Instead, it makes an assessment of the status quo against the proposed amended policy and rule framework. As noted above, this means that a resource consent application can still be made for a new building that exceeds 8m, even if it is adjacent to, or within the Seymour Avenue Heritage Precinct. This is not appropriate zoning.

6.3 The s32 report notes that constraining housing development at adjoining sites is likely to be a minor effect overall on housing availability. However, it does not identify that the option identified in PC29 has the potential to have a more than minor (and potentially significant) effect on heritage.

<sup>11</sup> [https://shape.nelson.govt.nz/download\\_file/view/4938/1324](https://shape.nelson.govt.nz/download_file/view/4938/1324)

6.4 The s32 analysis therefore fails to identify that a Medium Density Housing Residential zoning is contradictory to the current NRMP objectives and policies which seek to protect historic heritage. As drafted, PC29 does not meet the NRMP's historic heritage intent.

6.5 Further, this is in contravention to best practice planning including the guidance set out for the National Planning Standards<sup>12</sup>, with the National Planning Standards determining that:

*A zone spatially identifies and manages an area with common environmental characteristics or where environmental outcomes are sought, by bundling compatible activities or effects together, and controlling those that are incompatible.*

6.6 We submit that:

6.6.1 the section 32 report inadequately assessed impacts on heritage precinct values.

6.6.2 the Medium Density Residential zone for the Seymour Avenue Heritage Precinct is incompatible with the values of the heritage precinct.

## 7. Conclusion

7.1 We submit that,

7.1.1 the zoning in PC29 should reflect the Nelson Resource Management Plan objectives and policies as they relate to heritage. These are not subject to the plan change.

7.1.2 the Medium Density Residential zone for the Seymour Avenue Heritage Precinct is incompatible with the values of the heritage precinct.

7.1.3 the recommendations of Heritage Consultancy Services should be followed

7.1.4 Seymour Avenue should be considered within the context of transition/buffers due to its heritage status.

7.1.5 Rules REr.85 – 91 provide an appropriate rule set for activities within a heritage precinct, with an amendment to provide for non-compliance or a waiving of the need to obtain consent for activities in response to force majeure events (as described in submission point 4).

7.1.6 Seymour Avenue should not be zoned as a Medium Density Residential Zone.

7.1.7 Seymour Avenue in entirety should be zoned as a General Residential Zone.

7.1.8 The properties adjoining the Seymour Avenue Heritage Precinct are zoned as a General Residential Zone.

---

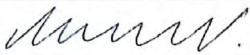
<sup>12</sup> <https://environment.govt.nz/assets/Publications/Files/guidance-for-zone-framework-and-district-spatial-layers-standards.pdf>

- 7.1.9 Adjoining and wider properties that provide contextual significance to the Seymour Avenue Heritage Precinct be recognised and appropriately be accorded protection through a General Residential zoning.

## 8. Hearing

- 8.1 The residents of the Seymour Avenue Heritage Precinct wish to be heard in support of this submission.
- 8.2 If others make a similar submission, the residents of the Seymour Avenue Heritage Precinct will consider presenting a joint case with them at a hearing.

Signed by:

|                  |                                                                                   |
|------------------|-----------------------------------------------------------------------------------|
|                  |                                                                                   |
| Heather Arnold   |  |
| Rebecca Clarkson |  |
| Carolyn Sygrove  | <i>Carolyn Sygrove</i>                                                            |
| Andrea Warn      | <i>Andrea Warn</i>                                                                |

On behalf of residents of the Seymour Avenue Heritage Precinct.

## Schedule 1 – Submissions

|   | Provision                                                            | Submission                                                                                                                                                                                                                                                                                                                                                                                               | Decision Sought                                                                                                                                                                                                         |
|---|----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Objective DO4.1                                                      | Support. The Seymour Avenue Heritage Precinct residents value and respect our historic heritage and spend considerable time and resource ensuring the character of the street is preserved and enhanced.                                                                                                                                                                                                 | The objective be retained.                                                                                                                                                                                              |
| 2 | Zoning for the Seymour Avenue Heritage Precinct                      | Oppose. Zoning the majority of Seymour Avenue as a Medium Density Residential Zone (allowing up to three dwellings of up to three stories on a single site REr.18B) does not protect the Precincts' historic heritage, it does not ensure that Council's obligations have been met in this regard (as a matter of National Importance) and does not retain or enhance the heritage precinct.             | The entirety of Seymour Avenue are zoned as a General Residential Zone.                                                                                                                                                 |
| 3 | Zoning for Properties Adjoining the Seymour Avenue Heritage Precinct | Oppose. Adjoining and wider properties that provide contextual significance to the Seymour Avenue Heritage Precinct should be recognised and appropriately be accorded protection.                                                                                                                                                                                                                       | The properties adjoining the Seymour Avenue Heritage Precinct, and in the wider area, properties that provide contextual significance to the Seymour Avenue Heritage Precinct, are zoned as a General Residential Zone. |
| 4 | Rule REr.18B                                                         | Oppose in part. Providing a rule that enables up to three dwellings of up to three stories on a single site for the properties within or adjacent to the Seymour Avenue Heritage Precinct does not protect the Precincts' historic heritage, it does not ensure that Council's obligations have been met in the protection of historic heritage and it does not retain or enhance the heritage precinct. | The properties within and adjoining the Seymour Avenue Heritage Precinct are excluded from this rule.                                                                                                                   |
| 5 | Rule REr.18T                                                         | Oppose in part. Providing a rule that enables up to three dwellings of up to three stories on a single site for the properties within or adjacent to the Seymour Avenue Heritage Precinct does not protect the Precincts' historic heritage, it does not ensure that Council's obligations have been met                                                                                                 | The properties within and adjoining the Seymour Avenue Heritage Precinct are excluded from this rule.                                                                                                                   |

|   |                   |                                                                                                                                |                                                                                                                                                                           |
|---|-------------------|--------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6 | Rules REr.85 – 91 | <p>in the protection of historic heritage and it does not retain or enhance the heritage precinct.</p> <p>Support in part.</p> | <p>The rules include an amendment to provide for non-compliance or a waiving of the need to obtain consent for activities in response to <i>force majeure</i> events.</p> |
|---|-------------------|--------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Appendix 1 – Seymour Avenue Heritage Precinct Historic Context

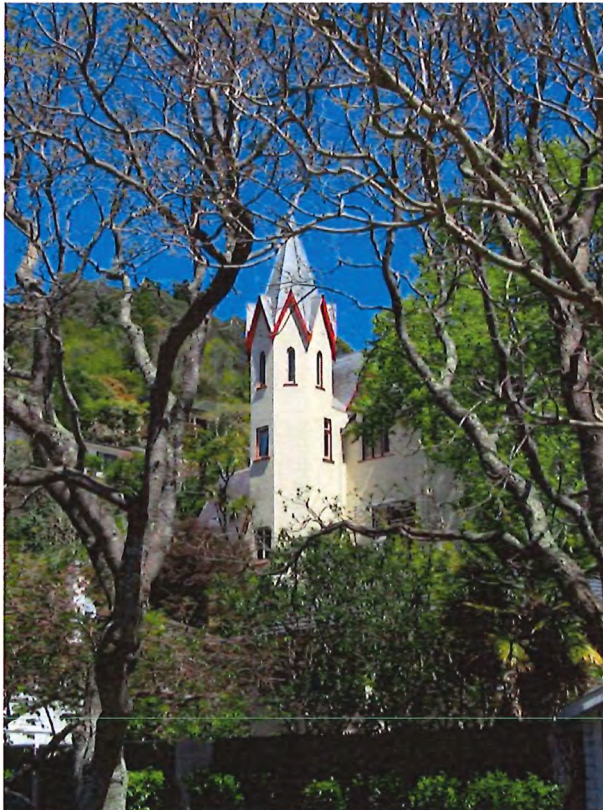


Seymour Avenue is an important example of well-preserved, New Zealand 20<sup>th</sup> century architecture, here in the heart of Nelson City. The houses in the street represent the transition from the villa-style homes of the early 1900's through to the American-inspired bungalow that dominated 1930's house design – and everything in between.

Transitional Villas were built roughly between 1908 and 1920 and as the name suggests, in a transitional period between the earlier Victorian villa and the new Indian inspired, California bungalows and these now uncommon houses retain components of both styles.

Seymour Avenue has several of these style houses which inside, are more open plan than older villas, with a broader, shorter central hall, and larger rooms and often have both sash and casement and bay windows.

In recognition of this, Seymour Avenue became a Heritage Precinct in 1995.



Seymour Avenue is also one of two commuter feeder routes from The Brook Valley and recently upgraded to become The Brook to Willow Walk Shared Path connector, with the installation of speed humps for traffic calming and a widened footpath/shared path.

This allows safer passage, for not only Brook school children to all Nelson primary and secondary schools (and transport to those schools), but all pedestrians and cyclists commuting to the City centre and beyond.



## Online submission

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

|                                  |                                                                             |
|----------------------------------|-----------------------------------------------------------------------------|
| <b>Submitter No.</b>             | S379                                                                        |
| <b>Submitter Name</b>            | Carole-Ann Lewis                                                            |
| <b>Submitter first name</b>      | Carole-Ann                                                                  |
| <b>Submitter surname</b>         | Lewis                                                                       |
| <b>Submitter is contact</b>      | Yes                                                                         |
| <b>Email</b>                     | <a href="mailto:caroleannl@icloud.com">caroleannl@icloud.com</a>            |
| <b>Wish to be heard</b>          | Yes                                                                         |
| <b>Joint presentation</b>        | No                                                                          |
| <b>Trade competition</b>         | I could not gain an advantage in trade competition through this submission. |
| <b>Directly affected</b>         | N/A                                                                         |
| <b>Withhold contact details?</b> | No                                                                          |

## Submission points

| Plan section                     | Provision       | Support/oppose | Reasons                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Decision sought                                                                                                               |
|----------------------------------|-----------------|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| Inner City and City fringe Zones | Inner City Zone | Oppose in part | <p>A design for the central city area is a must before Plan 29 is put into place!</p> <p>No buildings in Nelson Inner City should be more than 19.5m nor 8m in the medium zone, Also attention should be made to the sun light angles and no building should be only 1m from the boundary.</p> <p>A car park must be provided for each dwelling.</p> <p>There should be adequate sewage and water drainage in place for the extra housing and not putting more of a load on what we already have.</p> <p>New housing should not be at existing rate-payers' expense. Examiner, Wellington and Mount Streets are much too narrow for extra traffic congestion; there is already no parking on nearly all of these streets.</p> <p>There are many empty buildings in the city that could be changed and used for housing.</p> <p>All the squares could be used for building high rise apartments with parking under them.</p> <p>We should go back to what we have in place now with regards to heights and rules - daylight over/around.</p> | Review and redesign Plan 29 in its present form. The public was not given any voice on how intensification was to be managed. |

# Online submission

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

|                           |                                                                             |
|---------------------------|-----------------------------------------------------------------------------|
| Submitter No.             | S380                                                                        |
| Submitter Name            | Sharon Bryce                                                                |
| Submitter first name      | Sharon                                                                      |
| Submitter surname         | Bryce                                                                       |
| Submitter is contact      | Yes                                                                         |
| Email                     | <a href="mailto:sharonbryce1@gmail.com">sharonbryce1@gmail.com</a>          |
| Wish to be heard          | No                                                                          |
| Joint presentation        | No                                                                          |
| Trade competition         | I could not gain an advantage in trade competition through this submission. |
| Directly affected         | N/A                                                                         |
| Withhold contact details? | No                                                                          |

## Submission points

| Plan section       | Provision          | Support/oppose | Reasons | Decision sought |
|--------------------|--------------------|----------------|---------|-----------------|
| Entire Plan Change | General opposition | Oppose         |         |                 |

I 100% reject Plan 29 in its current form.

Im very concerned about the physical and social effects that such a plan will have on established residential properties and the future look and feel of our town.

Any plan that leaves the spatial configuration of new multi-storey buildings to pure chance or to the whim of the developer, is bound to lead to disappointing results with unintended consequences that will be hard if not impossible to come back from.

I acknowledge there is a degree of need regarding residential housing but I question the lack of vision, the degree of change and the one size fits all approach that is Plan 29.

#### ACHIEVING BALANCE

Plan 29 in its current form will have adverse affects for both existing residents and the new residents alike - albeit in different ways.

There must be an intensification vision and threshold that can satisfy the demands of homes for people without abandoning the people .

I'm opposed to anything over 4 stories being built in Nelson. The taller buildings that exist already, and I include the NCC building in the center of town, are ugly and dominate the sky line. I would much rather be looking at the hills and trees that surround Nelson as these vistas help to make it a joy to live here. These pre-existing

#### PREFERRED OPTIONS

**Evidently our current Future Development Strategy spells out the need for neighbourhood plans in the first instance. NCC surely then must design comprehensive neighbourhood plans first .Such plans will give some certainty about the form and location of future buildings, open space areas for outlook and privacy, future public and private green spaces, play areas etc. With a clear picture in mind, the community will be much more at ease about the changes. You will bring the people with you and not exacerbate divisions. Has NCC missed a step in the process? I would like to see comprehensive neighbourhood plans undertaken**

**Provision for carparking in or complementing all future developments .**

**A fair balance of developers offering residential builds catering to a broad spectrum of the market**

**A sympathetic blending of residential into the city without bringing about unintended social consequences**

**Prioritize sunlight. I favour height restrictions along with less dwellings per site so people are not denied direct sunlight**

**I support in principle residential builds no higher than 4 stories in the CBD and fringe commercial zones with conditions attached. We can see some good examples of this with Betts and the Poly Tech accommodation which are 3 stories high. The issue with**

buildings should remain as a visual reminder of exactly what not to do. They don't belong—please no more!

I'm 100% opposed to high rise residential buildings.

Normalising shoe box living via height, too many dwellings per site along with zero or limited green space is ill conceived and will not meet the needs of a wide range of people including those with growing families and or families with special and or complex needs as grateful as they may be to have a roof over their heads.

There has not been enough thought put in or conversation had about the social implications of such radical intensification including mental health and wellbeing. I do not see how stacking families on top of each other with only the streets and/ or public spaces to play constitutes a healthy environment.

The question then is how can the plan be constructed to prioritise positive social outcomes and add something to our community rather than create a problem.

Further more I understand that Council has no ability to enforce that carparks be included in high rise buildings. To justify and accept this by saying that most developers wouldn't consider leaving carparks out is not responsible planning. Its unacceptable for this door to be left open - The bigger the building ,the more people, the bigger the congestion problem on our streets.

**these examples of course is the lack of green space within these sites .**

**Particularly in regard to , but not limited to, families and affordable housing I'm more in favour of staggered row housing with a focus on good design and not so many dwellings per site, limited in height to 2 stories. This style of housing gives each house a small garden for kids to play, to grow your own veggies, relax outdoors, meet neighbours and socialise. It makes for a community and integrates the housing into the neighbourhood. Less worries for local residents about cutting off the sun and losing privacy. This type of housing negates the need for residents to solely rely on nearby public parks or greenspace.**

#### **FOOTNOTE**

**Despite Council extending the feedback time there still has not been sufficient time to get my head around every implication and unintended consequence of PLAN 29 therefore I suspect there are still issues hidden within the Plan that I can not comment on at this time therefore this submission cannot be a full representation of my views. I think there needed to be dedicated education sessions for the public – theres a lot to process.**

## AFFORDABILITY and REVITALISATION

I'm not convinced that the goals of revitalising the city and large scale residential housing in and near the CBD are compatible with each other and in reality could work against each other. I think each of these goals requires a custom made framework and way more public consultation. The one size fits all approach guarantees neither revitalisation nor affordability.

I'd like to see any Plan we adopt ensure and make explicit that there is a fair balance of developers offering residential builds for all those who are in the market for it from families to the retired. I'd like to see a plan that achieves a sympathetic blending of residential into the city without bringing about unintended social consequences. Plan 29 does not do this.

## SUNLIGHT

Whichever residential zone we are talking about sunlight is the big one.

Its absurd to build anything that blocks out peoples direct sunlight especially given the cold winters we have here and how much of a push there is for warm healthy homes.

Blocking the sun is not compatible with the push for warmer healthier homes. I favour height restrictions along with less dwellings per site so people are not denied direct sunlight.

## PROPOSED ZONES

I do not support the proposed new zones as they currently stand.

I think the High Density area spreads too far into established residential zones and the new height suggestions are completely incompatible with what already exists except for in the CBD and possibly fringe commercial/industrial areas which I think ought not exceed 4 stories.

I question the need for a medium density zone at all and once again the new height suggestions would have too great an impact on existing residences.

I think the proposed zones are an example of one size fits all which I am opposed to .

# Online submission

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

|                           |                                                                             |
|---------------------------|-----------------------------------------------------------------------------|
| Submitter No.             | S381                                                                        |
| Submitter Name            | Peter Sheppard                                                              |
| Submitter first name      | Peter                                                                       |
| Submitter middle name     | James                                                                       |
| Submitter surname         | Sheppard                                                                    |
| Submitter is contact      | Yes                                                                         |
| Email                     | <a href="mailto:petenmichelle@gmail.com">petenmichelle@gmail.com</a>        |
| 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         |         | I would like the NCC to withdraw Plan Change 29 Entirely and present to the people of Nelson some new options that enable intensification of housing, with less impact on existing residents and with better planning in general. |

I disagree with the approach of earmarking entire blocks of land for zoning change, based mainly on 'proximity to amenities' as described by planners at the public meeting held by NCC at the Trafalgar Centre some weeks ago. I see this approach as too narrow in its scope and it appears to ignore potential impact on existing residents and fails to recognize the topography of the land, the nature of the roading and the existing natural hazards in some of these areas.

We are the owners of 66 Tosswill Rd. If Plan Change 29 went ahead in its current form, this will enable our neighbour on our North boundary to build to 12m; this height of build would effectively put us in shade from approximately 8.00am to 1.00pm or later and would block our outlook to the north also. This would have a very negative effect on our lifestyle and possibly health.

Directly across the road the proposed change would enable building to 19.5m. The idea of buildings of this height and covering a large area as proposed along Tosswill Rd and down Tamaki Rd is quite disturbing to us as existing residents, for the following reasons:

- Shading would be a big issue for as at this height, as well as a large loss of outlook to the sea and the mountains.

We purchased our home in December 2020 for its sun and views (The home itself is circa 1939 and of modest condition) and we have relocated here this year. Had we known about the potential for a change of zoning as proposed in Plan Change 29, we would not have purchased here. The impact on our home in terms of potential shading, loss of view and loss of privacy would have been too much of a risk for us as a family. Even the uncertainty of whether development with these types of negative impacts would create anxiety for us as a family, should the Plan Change 29 changes be adopted in their current form.

- Natural Hazards are also an issue in the Tahunanui area; well documented flooding and subsequent land

subsidence alone we would see as a very good reason for intensification of housing as afforded by Plan Change 29 to be recognized as a flawed concept.

- Transportation is also an issue. Tosswill Rd and other streets in the area are already down to single lane and quite hazardous on a daily basis with just a single vehicle parked on the roadside. Creation of large apartment blocks and intensification in general will only exacerbate this issue - which is a serious safety issue in this area.

- Infrastructure is lacking and both stormwater and sewage systems in the Tahunanui Hills appear to be old and inadequate. The need for upgrading of these services to accommodate more residents appears to have been overlooked.

- Amenities in terms of a supermarket are not readily available close to Tahunanui.

- The existing character of housing in the Tahunanui hills is varied but is generally 1 - 2 story and residential a variety of ages of home from Heritage to modern and everything in between. Sizes of home also vary. The building of very large apartments or residential homes to 19.5 in particular would not fit well with the character of the area in general.

Overall, I would see the changes proposed by plan Change 29 to be unsuitable for the Tahunanui Hills in particular, for the aforementioned reasons.

However, I would suggest a more nuanced approach to creating more housing options across Nelson. Some sites will always lend themselves to development more than others and I would like to see NCC make changes that would give scope for building to the parameters suggested in Plan Change 29 - on a site by site basis, anywhere in the city, in consultation with existing residents.

I would also suggest that encouraging minor dwellings to be constructed on existing sites, 2nd full dwellings of 1 - 2 storey should be encouraged and NCC

rules could well be relaxed in terms of site coverage etc to enable this type of extra housing - without the necessity for multi-storey (12 - 19.5m in height). This could also bring in more funds in terms of rates payments to afford the corresponding increase in spending necessary for sewage and stormwater services, roading etc.

Thank you for the opportunity to submit. Myself and my family strongly oppose Plane Change 29 and would like to see NCC present alternatives.

Kind Regards

Peter Sheppard

# Online submission

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

|                           |                                                                             |
|---------------------------|-----------------------------------------------------------------------------|
| Submitter No.             | S382                                                                        |
| Submitter Name            | Anthony HEALEY                                                              |
| Submitter first name      | Anthony                                                                     |
| Submitter middle name     | John Mark                                                                   |
| Submitter surname         | HEALEY                                                                      |
| Submitter is contact      | Yes                                                                         |
| Email                     | <a href="mailto:tony_healey@outlook.com">tony_healey@outlook.com</a>        |
| 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 | The Plan Change process | Oppose         | no information has been taken into account from previous geotech reports. all in does is lump groups into tier 2 blanket zones. this submission relates to andy whiting place land. will create increases in insurance premiums,or denial of insurance cover. have not taken into account previous weather events,where areas not damaged. property values will fall. extensions will be difficult. | that plan change 29 is revisted.with an area by area design.[not one blanket fits all]. |

## Documents included with submission

None

**SUBMISSION FORM FOR NELSON CITY COUNCIL NOTIFIED PLAN CHANGE 29**

|                                                                                                                         |                                                                                                                                                    |
|-------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>To:</b><br>Senior Planning Administrator<br>RMA Plan Submissions<br>Nelson City Council<br>PO Box 645<br>Nelson 7040 | <b>Submitter:</b><br><b>Full Name:</b> Karin Harrison<br><b>Address:</b><br><br><b>Telephone:</b><br><b>Email:</b> forgotwhatitscalled@outlook.com |
|-------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|

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

**I OPPOSE** the Plan Change; and particularly the following

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

**I SEEK** the following decision from the Council

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

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

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

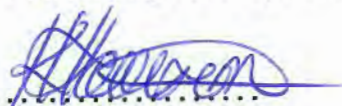
Other comments or concerns I have about Plan Change 29

|  |
|--|
|  |
|--|

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

|  |
|--|
|  |
|--|

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



Submitter

23/10/23

Date

**NB: TO BE DELIVERED TO NCC OR SENT TO [environmental.planning@ncc.govt.nz](mailto:environmental.planning@ncc.govt.nz) by 4.00 pm**

**Tuesday 19<sup>th</sup> September**

Received: 25/10/23  
Sub No: 5384  
NDocs: 539570224-  
16588

Rev 0.1

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

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

Submitter (Complete details below):

Full Name: ARIF MATTHEE

Address:

Telephone:

Email: arif@hamarconsulting.com

Signature of Submitter:

Date: 25/10/2023.



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...

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

**2) Hearing Panel**

- a) I strongly disagree with the make-up of the hearing panel, because of its 'biased' public perception following the vote on Councillor Courtney's proposal to withdraw PC29 at the 14<sup>th</sup> September Council meeting.
- i) I ask the Council to appoint Councillors from either side of the Sept 14<sup>th</sup> 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 Recessing 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.
- (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 RE2.3.1: The reception of daylight and sunlight to each household unit is a critical component of residential amenity that provides warmth and energy efficiency, and is vital for outdoor activities such as gardening and recreation. To ensure shading effects are minimised, and to ensure there is sufficient space around buildings to allow the admission of daylight to the site, this Plan has provided for daylight controls on all side and rear boundaries. The policy also applies to larger non-residential buildings such as schools or halls. The basic premise is that the daylight and sunlight received on a residential site should be no different whether or not the neighbour is residential. This philosophy applies whether the building is on an adjoining site or across a street.

#### 6) Privacy and Outlook

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

## 7) Intensification

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

## B) Progressively Phased Intensification

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

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

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

#### 9) Intensification in hazard zones

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

#### 10) On-street carparking

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

#### 11) Social Housing

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

**12) Infrastructure**

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