**Oral submission NCC PC29 – Rob Greenaway**

Kia ora koutou

I feel somewhat under-prepared here and I have to admit I only read up to page 98 in the Residential Rules chapter of the proposed amended NRMP. In my experience it always comes down to the rules and conditions in any consenting exercise, and they are usually the hardest to understand. I'm accustomed to making far more specific recommendations in a hearing than I am here.

Summarising my original submission and considering the s42a report:

1. Allowing for more intensive residential development in urban Nelson is necessary.
2. PC29 as originally proposed was not appropriate in scale and scope considering that it could have resulted in a massive change in Nelson's sense of place and community, with a lack of any comprehensive planning. I think the s42a report now recognises this, but I'm not sure that it goes far enough.
3. In my opinion the proposed permitted and restricted discretionary status of the associated consents for the various intensification zones were inappropriate considering the scale of change possible. PC29 represents a real leap of faith in planners and developers by the community.
4. Reading the s32 reports behind PC29 reminded me of reading a consent application – particularly with regard to reference to the likes of the RPS. Considering the scale of change proposed by PC29, it should be based on some pretty substantial planning pedigree. We don't have that here – just the FDS – and is that a statutory document? Paragraphs 6 to 8 in my submission detail my analysis of where the RPS should have been able to be relied on to provide some high level performance indicators for intensification. These are absent, and the s32 reports seem to have seen this as an opportunity to slip in something new rather than wonder if some high-level direction is missing.
5. Without those performance indicators, we need some other catch-alls to support quality outcomes. I see other submitters have raised the need for community planning – the NZ Association of Architects for example. When scanning the proposed residential rules I visualised the Association's photo they displayed last week of the undesirable two-story sausage development, and pondered their worry that PC29 would enable 'the worst outcome that we are comfortable with.' That's a great line. In my opinion PC29 as proposed would certainly result in that outcome. It's not clear to me if the revisions proposed within the s42a analysis solve all the problems.

6. I have not fully absorbed the economics evidence of Lawrence McIlrath, but I take from his analysis that PC29 would allow for a six-fold increase in population in Nelson, but that in reality uptake of development will be relatively slight. His final line in his paragraph 9.8 reads, "In the context of the relative demand, this level of provision, and spatial extent appears excessive in the Nelson context." I take this to mean that we are not yet in panic-mode – we have time to do a little neighbourhood planning. Time to develop design guidelines. Time to get it right.

7. I have nothing against a bit of structure planning. I thought – in fact hoped – we were going to get some through a Spatial Planning Act. This appears not to be, but I don't think anyone has said that we shouldn't do good spatial planning.

8. So the question is, where are the requirements for good spatial planning in PC29? I can't really answer that question, and of course rely on the panel here. But, what I can find is:

    a) In DO13A.1 recognising the local context: DO13A.1.1.vi *Implementation of actions in the Nelson City Council Urban Design Action Plan*. As per my submission point 14 – this is a 2008 document. I haven't seen any direction to update this and would not have been prepared with high-density development in mind. I'm not clear if a restricted discretionary assessment of a consent application can be processed with or without this design plan.

    b) DO13A.3.3 prominent and public buildings and spaces. As per my submission point 13 – the line "Prominent spaces and places should be defined by the Council" has been deleted, and DO13A.3.3.v "Undertake a prominent spaces and places assessment to help to define where particular design sensitivity is required" has been retained. I'm not sure why the deletion – although it could be correcting a tautology. Again, I'm not aware if a restricted discretionary assessment would require reference to a spaces and places assessment.

    c) DO13A.3.3.ii *Create, implement and use an Urban Design Panel to provide advice on private and public projects.* This is one of my submission points (14) that was accepted – albeit it was just a tidying of the wordage. And again, I'm unclear as to what reliance a restricted discretionary assessment must have on the recommendations of this panel.

9. My key point is that we are not in a panic to provide for intensification. It's necessary as identified in the FDS, and applications should be streamlined. Planners and developers are relying on the NRMP to define community expectations for good community development. It is not clear to me that this has been achieved with a relatively liberal set of restricted discretionary and permitted rules. These rules take input out of the hands of the community, and

they must therefore be heavily front-loaded with good spatial planning. My assessment is that PC29 and the s42a reports are substantially different, and imply that the original HDZ was very poorly considered, suggesting a lack of the necessary early input. The FDS is not enough. I have not seen the necessary planning input now for the remaining new zones and rules.

10. Without a lot of extra personal effort, I find it difficult to see if the s42a report is a great leap forward.
11. If we do not have effective planning to secure good outcomes – not just the 'worst that we are willing to accept' – then either rules applying in a general manner to large areas should become more discretionary than restricted discretionary, or good restricted discretionary rules should apply to smaller areas where demand is greatest and effective and efficient spatial planning can be implemented.

I was going to finish with a quote from William Samuels from his opinion piece in this week's Listener. But you heard from William last Wednesday, so I won't. However, I recommend your reading his article in addition – titled *Get your houses in order.*

Nga mihi nui