

Received: 24/10/23  
SubNo: 5685  
NDocs: 539570224-  
17431

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:** Helen Winwood

**Address:**

**Telephone:**

**Email:** hrwinwood@gmail.com

**Signature of Submitter:** HRWinwood

**Date:** 17/10/23

Delete as applicable: -

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

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

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17433

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**Submitter (Complete details below):**

Full Name: Christopher Alan Knox

Address:

Telephone:

Email: macknox18@gmail.com

Signature of Submitter: Chris Knox

Date: 20/10/23

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RECEIVED

25 OCT 2023

Rev 0.1

Customer Service

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: Judith Ashley Bartsch

Address:

Telephone:

Email: judyb@ts.co.nz

Signature of Submitter:

Date:

24/10/2023

Delete as applicable: -

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

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

I oppose the Plan Change **in part**

I request **amendments** to the Plan Change

My submission is:

I **oppose** the proposed change to high density residential zone for all new areas proposed, apart from a small area of central Nelson such as the city end of Milton Street.

I specifically oppose the proposed change to high density residential zone for Tamaki street due to:

- the steepness of the street
- stability of the land
- lack of access to amenities, such as a supermarket, which is a key amenity for high density living
- this area is also not walking distance to city centre or Stoke centre amenities and shops
- slips in neighbouring streets, such as Tosswill St. have impacted access to this area during the last Nelson flooding. Access into town over the hill was also limited by slips. The roads and hills are not currently fit for purpose for a substantial increase in use
- the loss of direct sunlight for this small residential area, which would have an impact on the mental health of residents – natural sunlight boosts serotonin levels and can help lift mood and prevent some mental health issues
- the loss of direct sunlight would also in particular impact the residents living in the older homes in this area, potentially increasing the dampness and mould in those homes and the use and cost of heating to keep the homes warm.

I seek the following decision from the council:

- To remove Tamaki Street from the proposed high density residential zone
- To amend Tamaki street area to medium density zone or less.

SubNo: 5687  
NDXs: 539570224-  
17438

I also want to acknowledge the following points:

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  - v) Reduction in property values and increased financial stress, because the house would be less desirable to live in.
  - vi) Residents, struggling with the cost-of-living crisis may not afford to heat their home.
  - vii) Property owners will be reluctant to invest in making additional new (low rise) infill improvements on their section, with affordable additional units that **COULD** be over shadowed and devalued by a wealthier developer who could afford to build a multi-storey development next door at any time in the future.
- (1) I ask the Council to maintain the AP15 Daylight Admission protection rules to all pre-existing properties, unless the owner gives written approval to the contrary.
- (2) I strongly support the inclusion of Daylight and Sunlight policy statement Para RE2.3.i: The reception of daylight and sunlight to each household unit is a critical component of residential amenity that provides warmth and energy efficiency, and is vital for outdoor activities such as gardening and recreation. To ensure shading effects are minimised, and to ensure there is sufficient space around buildings to allow the admission of daylight to the site, this Plan has provided for daylight controls on all side and rear boundaries. The policy also applies to larger non-residential buildings such as schools or halls. The basic premise is that the

daylight and sunlight received on a residential site should be no different whether or not the neighbour is residential. This philosophy applies whether the building is on an adjoining site or across a street.

## 5) 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'.

## 6) 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.

## **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) 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.

## **8) Intensification in hazard zones**

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

## **9) On-street carparking**

- a) Increased intensification 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.

## **10) Social Housing**

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

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

#### **11) Infrastructure**

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

# RMA Submission Form for Publicly Notified Plan Change 29

  
Nelson City Council  
Te Kaunihera o Whakatū

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

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

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

\*Required

## Submitter Details

|                 |                              |
|-----------------|------------------------------|
| Full Name*      | Jane Wickham and Graeme Muir |
| Organisation    |                              |
| Contact Person  | Jane Wickham                 |
| Postal address* |                              |
| Telephone*      |                              |
| Email*          | jane.wickham@icloud.com      |

|                                     |
|-------------------------------------|
| OFFICE USE                          |
| Submission No: 5688                 |
| Date Received Stamp:<br>26-Oct-2023 |
| NDOCs No: 539570224-17440           |

## Trade Competition\*

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

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

## Council Hearing\*

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

## Public information

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

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

19/10/23  
Date\*

# RMA Submission Form for Publicly Notified Plan Change 29

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

- |                                                         |                                                      |
|---------------------------------------------------------|------------------------------------------------------|
| <input checked="" type="checkbox"/> Entire Plan Change  | <input type="checkbox"/> Papakāinga                  |
| <input type="checkbox"/> Residential                    | <input type="checkbox"/> Transport                   |
| <input type="checkbox"/> Inner City and City Fringe     | <input type="checkbox"/> Mapping                     |
| <input type="checkbox"/> Industrial                     | <input type="checkbox"/> Infrastructure              |
| <input type="checkbox"/> Suburban Commercial            | <input type="checkbox"/> Area outside of Plan Change |
| <input type="checkbox"/> Natural Hazards/Climate Change | <input type="checkbox"/> Subdivision                 |
| <input type="checkbox"/> Heritage                       | <input type="checkbox"/> Other                       |

- |                                                                |                                                                |
|----------------------------------------------------------------|----------------------------------------------------------------|
| I/we*: <input type="checkbox"/> Oppose the Plan Change in part | <input type="checkbox"/> Oppose the Plan Change                |
| <input type="checkbox"/> Support the Plan change in part       | <input checked="" type="checkbox"/> Support the Plan Change    |
| <input type="checkbox"/> Are Neutral about the Plan Change     | <input type="checkbox"/> Request amendments to the Plan Change |

## My submission is\*:

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

- We support the Proposed Plan Change 29 for the following reasons.
- We support increased density by building up not out
  - We see it improving the economics and viability of public transport and infrastructure
  - It reduces the incursion of the city into productive land or land unsuitable for housing for a variety of reasons.
  - We see it benefitting social interaction as neighbourhoods become more connected and have better facilities, such as walkways and cycle ways.

# RMA Submission Form for Publicly Notified Plan Change 29

**I seek the following decision from the Council\*:**

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

we seek the qualitative controls on design  
advocated by the Chair of the Nelson Marlborough  
branch of Te Kōhui Whakanga, NZ Institute  
of Architects.

ie design led development rather than  
~~the~~ developers having a free hand.

**Note:**

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

# RMA Submission Form for Publicly Notified Plan Change 29



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

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

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

|                                         |
|-----------------------------------------|
| OFFICE USE                              |
| Submission No: S 689                    |
| Date Received Stamp:<br><br>24-Oct-2023 |
| NDOCs No: 539570224<br>-17442           |

\*Required

## Submitter Details

|                 |                                 |        |                                 |
|-----------------|---------------------------------|--------|---------------------------------|
| Full Name*      | Willem Stein and Cornelia Drast |        |                                 |
| Organisation    |                                 |        |                                 |
| Contact Person  |                                 |        |                                 |
| Postal address* |                                 |        |                                 |
| Telephone*      |                                 | Email* | terra.nova.terrafirma@gmail.com |

## Trade Competition\*

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

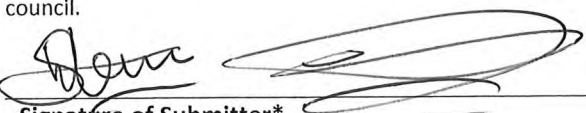
- ☐ I/we could not gain an advantage in trade competition through this submission.
- ☐ I/we could gain an advantage in trade competition through this submission. If yes, please complete the following:
- ☐ I/we are directly affected by an effect of the subject matter of this submission that: (a) adversely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

## Council Hearing\*

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

## Public information

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

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

23-10-2023  
Date\*



# RMA Submission Form for Publicly Notified Plan Change 29

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

- |                                                         |                                                      |
|---------------------------------------------------------|------------------------------------------------------|
| <input type="checkbox"/> Entire Plan Change             | <input type="checkbox"/> Papakāinga                  |
| <input checked="" type="checkbox"/> Residential         | <input type="checkbox"/> Transport                   |
| <input type="checkbox"/> Inner City and City Fringe     | <input checked="" type="checkbox"/> Mapping          |
| <input type="checkbox"/> Industrial                     | <input type="checkbox"/> Infrastructure              |
| <input type="checkbox"/> Suburban Commercial            | <input type="checkbox"/> Area outside of Plan Change |
| <input type="checkbox"/> Natural Hazards/Climate Change | <input type="checkbox"/> Subdivision                 |
| <input type="checkbox"/> Heritage                       | <input type="checkbox"/> Other                       |

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

**My submission is\*:**

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

See attachment.

~~Draft~~ Submission on Plan Change 29

Name Willem Stein and Cornelia Drost

Address

Our submission is to oppose the proposed Medium Density and High-Density Residential Zones on the Tahunanui Hills between Maire Street and Tamaki St, and Tamaki St to Winns Lane and Stansell Avenue.

Reasons for our submission:

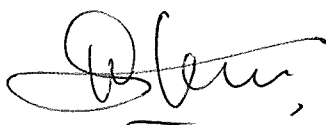
- The roads serving this part of Tahunanui are too narrow and have poor sightlines. They are unsuitable for the increased traffic that will be generated by medium and high-density housing, especially if no onsite parking is required for these houses. Unfortunately, there is no longer any public transport on this part of the hills. Our local bus service was withdrawn after the August 2022 land slips and no longer comes through these proposed new zones.
- Existing stormwater and wastewater systems on the Tahunanui Hills are not designed for higher density housing. In recent years we have seen stormwater overflowing during high intensity rainfall events into properties along Tahunanui Drive and in Tosswill Road.
- Instability affects a swathe of land (old sea cliff) through the proposed Medium Density Residential Zone and the High Density Residential Zone. The August 2022 "atmospheric river of rain" event caused land slipping along Tosswill Rd, Chamberlain St and in the Tosswill Reserve. The slipping was significant enough to cause road closure. Denser housing development is likely to result in more land disturbance as building platforms are cut for these multiple housing projects.
- There has been insufficient consultation for such a major change in housing density in Nelson's residential areas.
- The proposed new height limits (12m for MDR and 19m for HDR), steeper daylight angles are too high. There are limited open space requirements and yards are too small. These rules are likely to cause overlooking, loss of privacy and lack of daylight.

We seek the following decision from the Council:

Delete Medium Density Residential Zone and High Density Residential Zone from Tahunanui Hills.

Medium and high-density housing is best located near the larger shopping centres and large open space reserves such as in Stoke and Nelson Central which are on flat land. These locations are generally better served by public transport and other services.

23-10-2023



# RMA Submission Form for Publicly Notified Plan Change 29



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

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

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

\*Required

## Submitter Details

|                 |                                     |        |                         |
|-----------------|-------------------------------------|--------|-------------------------|
| Full Name*      | Rosemary Jane & John Donald BEALING |        |                         |
| Organisation    |                                     |        |                         |
| Contact Person  | John Bealing                        |        |                         |
| Postal address* |                                     |        |                         |
| Telephone*      |                                     | Email* | bealingjohnnd@gmail.com |

|                                     |
|-------------------------------------|
| <b>OFFICE USE</b>                   |
| Submission No: 5690                 |
| Date Received Stamp:<br>24-Oct-2023 |
| NDOCs No: 539570224<br>-17444       |

## Trade Competition\*

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

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

## Council Hearing\*

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

## Public information

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

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

8/09/2023  
Date\*

# RMA Submission Form for Publicly Notified Plan Change 29

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

- |                                                         |                                                      |
|---------------------------------------------------------|------------------------------------------------------|
| <input checked="" type="checkbox"/> Entire Plan Change  | <input type="checkbox"/> Papakāinga                  |
| <input type="checkbox"/> Residential                    | <input type="checkbox"/> Transport                   |
| <input type="checkbox"/> Inner City and City Fringe     | <input type="checkbox"/> Mapping                     |
| <input type="checkbox"/> Industrial                     | <input type="checkbox"/> Infrastructure              |
| <input type="checkbox"/> Suburban Commercial            | <input type="checkbox"/> Area outside of Plan Change |
| <input type="checkbox"/> Natural Hazards/Climate Change | <input type="checkbox"/> Subdivision                 |
| <input type="checkbox"/> Heritage                       | <input type="checkbox"/> Other                       |

- |        |                                                                   |                                                                       |
|--------|-------------------------------------------------------------------|-----------------------------------------------------------------------|
| I/we*: | <input type="checkbox"/> Oppose the Plan Change <b>in part</b>    | <input type="checkbox"/> <b>Oppose</b> the Plan Change                |
|        | <input type="checkbox"/> Support the Plan change <b>in part</b>   | <input type="checkbox"/> <b>Support</b> the Plan Change               |
|        | <input type="checkbox"/> Are <b>Neutral</b> about the Plan Change | <input type="checkbox"/> Request <b>amendments</b> to the Plan Change |

**My submission is\*:**

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

## RMA Submission for Publicly Notified Plan Change 29

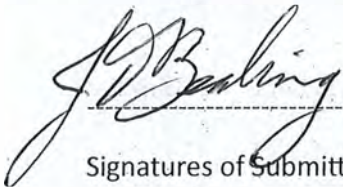
Submitter: Jane & John Bealing

### Trade Competition

We could not gain an advantage in Trade Competition through this submission.

### Council Hearing

We do wish to be heard in support of our submission.

Signatures of Submitters

Date: \_\_\_\_\_

Note: We reject PC 29 in its entirety, however if it is not rejected, then the following are our points.

We **Oppose** the creation of both the Medium and High Density Residential Zones (MDZ & HDZ), because of the height and the permitted intensity of the number of units allowed under the proposed plan changes.

We feel that the new plan will alter the character and the living environment to such a degree that the whole reason for our returning to the Nelson Area for its good climate and high annual sunshine figures, will be lost, if a number of 19.5m high structures were to be built on our northern boundary. Not only will we lose most of our direct sunshine into our house, but also much of the production of fruit and vegies from our large (1000+ m2 section).

Since our section has a long northern boundary (around 65m long), the shadows cast by the mid-winter, mid-day sun (given a flat land scenario) is around 65 m or 5 average width sections (not inducive to the well-being of the affected residents). This means that the number of MDZ & HDZ sections that the Council is allowing for over the planned design period (if there is not a specific intensification of these new developed areas into a concentrated few CBD blocks), has a high potential for a large proportion of existing established dwellings being affected. i.e. Don't scatter the skyscrapers.

Since we already have some tall groups of protected heritage trees growing across the road and one or two sections to our NW, then we already are well aware of what we could be in for if this Plan Change is allowed to go ahead.

We understand the need to allow for new people to move to our "great little city", but we do feel that our elected representatives should be first looking after the existing ratepayers (in our case, for more than 40 years at this address), ahead of new ratepayers. We get the impression that NCC are thumbing their nose at current ratepayers.

NCC should be encouraged to consider:

- Higher rise residential buildings where whole central city blocks have been encouraged to have units above the shops / in the CBD.
- Many sections around the CBD and inner city occupied by Air B & B, absent landlords, vacant commercial premises, houses vacant for most of the year owned by overseas residents, NZ Army Compound, and numerous car sales outlets.
- Development of inner-city sites, recently sold, offering ideal multi-unit sites that could be placed in such a way, that the loss of sunshine reaching neighbours could be minimised by reducing building heights as the building approaches their E, W and S boundaries (a similar approach as was adopted in a minor way for Green Gables redevelopment). Such properties as the Masonic Lodge, Trinity Church and Wainui House are all large enough to incorporate this system.

Other points that we feel NCC should place more weight on when contemplating PC 29 residential development are:

- Sort out the confusion created by using the terminology "daylight" angles, where "sunlight" angles are what is important. All windows will pass "daylight", but only those not in shadow will pass "sunlight".
- All neighbours that will be significantly affected by proposed changes should have to give their written approval before any new building consents are approved by Council.
- Earthquake fault lines together with land subject to rising sea levels, liquifaction and flooding should be avoided.
- Avoid building intensification on self-draining, high quality, versatile soils that will grow a wide range of horticultural crops. Such a soil exists on our and on our neighbours' properties.

NCC needs to remember that any older existing residents who are forced to shift from their present home (largely from loss of sunlight) may not have sufficient time left for them to replant some orchard trees that can take a decade or more to get into full production (e.g. avocado trees).

Health and Safety concerns, with regard to slipping on ice, will be another concern for elderly residents left in houses in areas with numerous high-rise structures.

We feel that the PC 29 proposal spreads the MDZ & HDZ over a far greater area than is needed, and that these taller buildings should be confined to the CBD, and only allowed to spread further once the CBD is considered "full".

Given that Nelson City is only classified as a "second tier city", then there is no necessity to go to the proposed heights to accommodate more people.

The area of "flat land" within the CBD, that will be affected by "sea rise", will place pressure on future developments being shifted to more appropriate areas around Richmond.

### **In Conclusion**

We feel that PC29, as proposed, is not acceptable for the future growth of Nelson City, and that many of the criteria used to decide what can be done, with no need for neighbours consent, is much too lax, and that NCC policy design staff need to readdress the whole exercise with more appropriate restrictions.

# RMA Submission Form for Publicly Notified Plan Change 29

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

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

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

| OFFICE USE                                     |
|------------------------------------------------|
| Submission No: <u>56a1</u>                     |
| Date Received Stamp:<br><br><u>24-Oct-2023</u> |
| NDOCs No: <u>53957/224</u><br><u>-17446</u>    |

\*Required

## Submitter Details

|                 |                            |        |                             |
|-----------------|----------------------------|--------|-----------------------------|
| Full Name*      | <u>JOHN STEWART WALKER</u> |        |                             |
| Organisation    |                            |        |                             |
| Contact Person  | <u>JOHN WALKER</u>         |        |                             |
| Postal address* |                            |        |                             |
| Telephone*      |                            | Email* | <u>john@junctions.co.nz</u> |

## Trade Competition\*

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

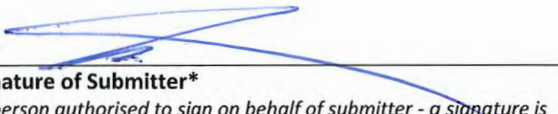
- ☒ I/we **could not** gain an advantage in trade competition through this submission.
- ☐ I/we **could** gain an advantage in trade competition through this submission. *if yes, please complete the following:*
- ☐ I/we **are** directly affected by an effect of the subject matter of this submission that: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

## Council Hearing\*

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

## Public information

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Signature of Submitter\*

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

18-10-2023  
Date\*

# RMA Submission Form for Publicly Notified Plan Change 29

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

|                                                         |                                                      |
|---------------------------------------------------------|------------------------------------------------------|
| <input checked="" type="checkbox"/> Entire Plan Change  | <input type="checkbox"/> Papakāinga                  |
| <input type="checkbox"/> Residential                    | <input type="checkbox"/> Transport                   |
| <input type="checkbox"/> Inner City and City Fringe     | <input type="checkbox"/> Mapping                     |
| <input type="checkbox"/> Industrial                     | <input type="checkbox"/> Infrastructure              |
| <input type="checkbox"/> Suburban Commercial            | <input type="checkbox"/> Area outside of Plan Change |
| <input type="checkbox"/> Natural Hazards/Climate Change | <input type="checkbox"/> Subdivision                 |
| <input type="checkbox"/> Heritage                       | <input type="checkbox"/> Other                       |

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

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

**My submission is\*:**  
(Include whether you support or oppose the specific provisions or wish to have them amended, and reasons for your views)

① NO OFF STREET PARKING

② HEIGHT IS GOING TO AFFECT DAYLIGHT TO OTHER PROPERTIES

③ IS OUR INFRASTRUCTURE ASKE TO HANDLE THIS PLAN

④ THE CBD COMMERICAL SUITABLE FOR 6 LEVELS, NOT THE RESIDENTIAL WHICH SHOULD BE A MAX 3 LEVELS, BUT ON APPLICATION WHICH WILL REQUIRE RESOLVIE CONSENT.

⑤ OBJECT TO ROHAN O'NEIL STEVENS AND TRUDIE BRAN) BEING APPOINTED AS COMMISSIONERS. REASON IS THE VOTED FOR THE COUNCIL TO KEEP PLAN 29 AS IS, THIS IS NOT TRANSPARENT

# RMA Submission Form for Publicly Notified Plan Change 29

I seek the following decision from the Council\*:

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

- ① THIS PLAN MUST PROVIDE A % OF PARKING DEPENDING ON THE HEIGHT OF THE BUILDING.
- ② TO PROVIDE DAYLIGHT FOR SOLAR POWER AND VEG CROPPERS
- ③ TO PROVE OUR INFRASTRUCTURE CAN HANDLE THIS PLAN
- ④ START WITH 6 LEVELS IN THE CBI ONLY
- ⑤ APPOINT 3 INDEPENDANT COMMISSIONERS TO BE TRANSPARENT, NOT THE 2 COUNCILLORS

**Note:**

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

# RMA Submission Form for Publicly Notified Plan Change 29



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

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

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

|                                     |
|-------------------------------------|
| <b>OFFICE USE</b>                   |
| Submission No: 5692                 |
| Date Received Stamp:<br>26-Oct-2023 |
| NDOCs No: 539571226<br>-17448       |

\*Required

## Submitter Details

|                 |                          |
|-----------------|--------------------------|
| Full Name*      | HELEN HOBY               |
| Organisation    |                          |
| Contact Person  | As above                 |
| Postal address* |                          |
| Telephone*      |                          |
| Email*          | helen.perry@kinect.co.nz |

## Trade Competition\*

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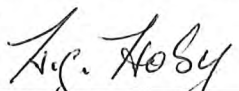
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- ☐ I/we are not directly affected by an effect of the subject matter of this submission that: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.

## Council Hearing\*

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

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

22.10.23  
Date\*

# RMA Submission Form for Publicly Notified Plan Change 29

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

- |                                                                |                                                      |
|----------------------------------------------------------------|------------------------------------------------------|
| <input checked="" type="checkbox"/> Entire Plan Change         | <input type="checkbox"/> Papakāinga                  |
| <input checked="" type="checkbox"/> Residential                | <input type="checkbox"/> Transport                   |
| <input checked="" type="checkbox"/> Inner City and City Fringe | <input type="checkbox"/> Mapping                     |
| <input type="checkbox"/> Industrial                            | <input type="checkbox"/> Infrastructure              |
| <input type="checkbox"/> Suburban Commercial                   | <input type="checkbox"/> Area outside of Plan Change |
| <input type="checkbox"/> Natural Hazards/Climate Change        | <input type="checkbox"/> Subdivision                 |
| <input type="checkbox"/> Heritage                              | <input type="checkbox"/> Other                       |

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

My submission is\*:

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

- I reject Plan Change 29 in its entirety.
- Lack of early public engagement & consultation means ratepayers have found the implications for this future development extremely stressful.
  - Difficult to digest the total effect of this proposed Plan change 29 due to size and complexity.
  - The Population projections are questionable. Is the need there for such radical intensification in residential areas?
  - Council Planning Staff appear to have given little thought to the "Future Design of Nelson" as a whole.
- My Main Concern is = "The High Density Residential Zone".
- This is not in keeping with the low-rise housing we currently have. In the area we reside near to Fairfield Park, to have anything higher than 2 storey buildings on small sections would leave neighbouring residents with greatly depleted sunlight. The benefits of sunlight to everyday living is well known. The affect will be increased mental health concerns and depression.
  - The possibility of high-rise buildings so close to older residential housing, with boundary setbacks 1 metre, would devalue properties, decrease privacy and increase anxiety.

# RMA Submission Form for Publicly Notified Plan Change 29

I seek the following decision from the Council\*:

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

What I ask N.C. Council to Do =

① Create a "Nelson Urban Design Plan"

- Need neighbourhood spatial plans. Each neighbourhood has its own character, therefore has specific design needs.
- To get good quality intensive design, we need good planning and quality standards.
- Need citizen participation, that way the Council will get more public trust.
- Strengthen the current Urban Design Panel. To ensure developers abide by the design plans and character of a neighbourhood.
- Retain security of status for Heritage buildings in the Inner City and Wakefield Quay precincts.

Continued overleaf.

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  - c. would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
  - d. contains offensive language.
  - e. is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Continued from P.3.

What I ask N.C. Council to do =

- ② Remove the 'High Density Zone' for residential areas.
- Not appropriate to have 4-6 storey buildings in close proximity to single storey residents.
  - Lack of Sun & Privacy. Will cause anxiety and increase mental health issues. Retired people choose to live in areas close to the City for the sun, to enjoy walking and gardening. We enjoy mixed ages with families in the neighbourhood.
- ③ Develop a Plan for "Inner City and Fringe areas."
- Our inner city spaces are not well utilised and there is a great opportunity for revitalisation. Multiple level buildings for apartments plus office space/retail in lower levels could work well for young people who can also easily access walking & biking tracks.
  - There are many areas on the City fringe where development could happen without impacting on residential areas. West of Rutherford Street there are areas suitable for 4 plus storey buildings. It would seem there are also <sup>some</sup> areas East of Collingwood Street.

Conclusion.

In conclusion I must say I have listened to some very thoughtful and qualified residents who are passionate about the Future Development of Nelson, our City, as am I. I agree we need some intensification and planning for the future, but this is too important to all of us to get wrong. Please listen to the submitters. Please rethink and rework Plan Change 29.

# RMA Submission Form for Publicly Notified Plan Change 29



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

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

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

|                                                 |
|-------------------------------------------------|
| <b>OFFICE USE</b>                               |
| Submission No: <u>8693</u>                      |
| Date Received Stamp:<br><br><u>24-Oct-2023.</u> |
| NDOCs No: <u>539570224</u><br><u>-17450</u>     |

\*Required

## Submitter Details

|                 |                                 |        |                                 |
|-----------------|---------------------------------|--------|---------------------------------|
| Full Name*      | <u>Peregrine Llewellyn HOBY</u> |        |                                 |
| Organisation    |                                 |        |                                 |
| Contact Person  | <u>As Above</u>                 |        |                                 |
| Postal address* |                                 |        |                                 |
| Telephone*      |                                 | Email* | <u>helen.perry@kinect.co.nz</u> |

## Trade Competition\*

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

- ☒ I/we ~~could~~ **could not** gain an advantage in trade competition through this submission.
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## Council Hearing\*

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

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

Date\*

22-10-23

# RMA Submission Form for Publicly Notified Plan Change 29

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- |                                                         |                                                      |
|---------------------------------------------------------|------------------------------------------------------|
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| <input type="checkbox"/> Industrial                     | <input type="checkbox"/> Infrastructure              |
| <input type="checkbox"/> Suburban Commercial            | <input type="checkbox"/> Area outside of Plan Change |
| <input type="checkbox"/> Natural Hazards/Climate Change | <input type="checkbox"/> Subdivision                 |
| <input type="checkbox"/> Heritage                       | <input type="checkbox"/> Other                       |

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

My submission is\*:

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

*I oppose The adoption of PC 29 as a whole.*

- a) *The size & complexity of the proposed PC29 was such that it was beyond me to take in its total effect.*
- b) *I oppose the appointment to the hearing panel of two Councillors who opposed the withdrawal of PC 29.*
- c) *Ratepayers, have been put into a state of stress, as to how their properties may be impacted as regards loss of sunlight & privacy & consequently loss of value!*
- d) *If PC 29 were to be implemented, developers would have carte blanche, which is my experience, they would take full advantage of to the detriment of adjoining properties. Developers must seek consent!*

# RMA Submission Form for Publicly Notified Plan Change 29

I seek the following decision from the Council\*:

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

- e) Intensification - whilst I do not oppose the concept, I do as to the proposal in PC 29.  
In particular, I strongly oppose the adoption of a High Density Residential Zone  
e.g. Our property, a rear section, has properties on its North & East boundaries that lend themselves to development.  
Multi storey developments on these properties (esp. to 1m from boundaries) would result in a total loss of sunlight until late in the day, & of privacy.  
P.T.O.

## Note:

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  - e. is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

This would result in a substantial loss of value, possibly to the extent of being unsaleable!

Planned intensification should begin with CBD & fringe areas. With regard to the latter, the area to the West of Rutherford Street, currently occupied by car yards is very suitable. Multi storey development would not, in most cases, impact adjoining properties to any extent.

f) Greenfields - further development on highly productive land is to be avoided.

However, I believe a Satellite Village could be developed in The Aira area, beyond Gentle Annie.

Rolliston has been a great success for Christchurch & I understand a village is being developed out of Hamilton & which has attracted government support to the tune of \$280m.

Received: 18/10/23  
Sub No: 5694  
NDOC5539571224  
-17675

## Submission to Nelson City Council on Plan Change 29

**From:** Glenys MacLellan,  
**Email:** [g\\_j\\_mac@xtra.co.nz](mailto:g_j_mac@xtra.co.nz)

**Phone:**

I wish to speak to this submission.

We must never forget that all housing development needs to meet the live-inable requirements of our citizenry. Unfortunately projections of the types of housing and for how many people in each unit never seem to be an accurate reflection of what comes to pass. A quote on housing for Council to remember is from economist JK Galbraith "The market has never built housing the poor can afford". Social housing is desirable in all zones.

I think the concept of zoning with the separation of commercial (shops & offices) and residential activities is flawed and a barrier to building denser cities. Using the traditional style of the shop at ground with 2 or 3 levels of homes above, around the marketplace or other public area (preferably with trees and gardens) is one that works much better for people than stand alone large complexes not connected to anything. Meeting places here are everywhere and communities naturally build from their residents. All new developments should be required to have walking connected public spaces.

While I have no objection to 4 or 5 storey accommodation being built within the CBD, around NMIT for student lodgings and to the north of industrial zones if they do not shade out existing homes, I do not think these are appropriate for the proposed High Density Zone because we do not have the population to support such scale over the HDZ area and hopefully never will.

I live in what is medium density housing in Nelson, 12 x 2 bedroom units of approx 60m<sup>2</sup> plus driveway and carports on 2900 sqm. This has created what I call a little village with 24 people and an age range of 2 to 81 currently. These are the types of communities higher density housing needs to be thinking of when designing the complexes. It's not just about the structures, people need to enjoy living there and a wide demographic has more of a community building opportunity. Design for the ability of neighbours to meet and mingle is essential.

**Wind:** Having lived in Wellington and been nearly blown over several times by wind tunnels caused by high rise buildings, I think any building higher than 10 metres should be required to have a wind impact statement from both the way the wind impacts the building and how the building impacts what the wind does when they meet. If buildings between 5 and 10 metres high are clustered with others then the council needs to determine whether the next building would need to produce one too. Nelson may not have the wind speeds that Wellington has but we have fairly constant sea breezes that could become funnelled along its CBD grid, making for unpleasant walking experiences.

**Noise:** All multi-household and/or multi-level housing need to have really good noise mitigation built in or they do not work for residents. In the past 15 years, my village has occasionally had major noise issues, regular calls to NCC to complain, neighbourly angst etc. It may be that people need advice on how to live on top of each other.

**Impermeable surface area:** All housing needs to have areas of permeable ground adjacent to them. Hopefully there will soon be less need for so many roads of 2 way and a lot more lanes so walking becomes the norm for most people. Impermeable surfaces cause lots of run-of from rain and carry pollutants into the stormwater system. Rethinking what is done with rain water has to

happen and soon. Nelson's CBD has very little permeable land, more is needed and should be part of all developments.

**HDZ:** I think 3 storey terrace style housing is OK in the HDZ if it has some restrictions put on it, as follows:

1. They must never shade out neighbours, especially to the south by more than an area consistent existing house would.
2. They must never cast shade over existing pvs or solar hot water systems.
3. They must be light colours – large, dark coloured buildings can be very oppressive and overpowering to many people, not to mention depressive. Full glass cladding can cause reflective issues and so is not appropriate.
4. All such developments need neighbourhood consultation and consents to ensure it complies with the neighbourhood plan. Plan changes are not permitted except under a full consultation process.
5. Accessible design is essential and cheaper to build in than refurbishment when needed and should be mandatory.
6. Passive solar design should be the norm (NB: this should apply everywhere).
7. A communal area with trees is included, either as gardens or park or just a pleasant the number of units.

I am reminded of the unintended outcomes in the UK when Councils there started pulling down the old terraced housing and replacing them with high-rise (much higher than proposed here of course). It destroyed the local communities that these streets had always had, and alienation began appearing along with social isolation for the less mobile and more residents began to fear for their safety after dark. Buildings do not have to be very high for this to happen; it's all about the design. This is not the result we want or need in Nelson.

We need to design for people not machines.

# RMA Submission Form for Publicly Notified Plan Change 29



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Tuesday 31 October 2023 to:

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RMA Plan Submissions  
Nelson City Council  
PO Box 645  
Nelson 7040

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

\*Required

## Submitter Details

|                 |                                |        |                          |
|-----------------|--------------------------------|--------|--------------------------|
| Full Name*      | Juan Ortiz Torrenova           |        |                          |
| Organisation    | Ortiz Architectural Studio Ltd |        |                          |
| Contact Person  |                                |        |                          |
| Postal address* |                                |        |                          |
| Telephone*      |                                | Email* | design@ortizstudio.co.nz |

## OFFICE USE

Submission No: 5695

Date Received Stamp:

16/10/23

NDOCs No: 5957 1224  
- - - - 17678

## Trade Competition\*

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

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

- ☒ I/we **do not** wish to be heard in support of my/our submission.
- ☐ I/we wish to be heard in support of my/our submission. If yes:
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Signature of Submitter\*

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

15/10/2023

Date\*

# RMA Submission Form for Publicly Notified Plan Change 29

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

- |                                                                |                                                      |
|----------------------------------------------------------------|------------------------------------------------------|
| <input type="checkbox"/> Entire Plan Change                    | <input type="checkbox"/> Papakāinga                  |
| <input checked="" type="checkbox"/> Residential                | <input type="checkbox"/> Transport                   |
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| <input type="checkbox"/> Natural Hazards/Climate Change        | <input type="checkbox"/> Subdivision                 |
| <input type="checkbox"/> Heritage                              | <input type="checkbox"/> Other                       |

- |        |                                                            |                                                                           |
|--------|------------------------------------------------------------|---------------------------------------------------------------------------|
| I/we*: | <input type="checkbox"/> Oppose the Plan Change in part    | <input type="checkbox"/> Oppose the Plan Change                           |
|        | <input type="checkbox"/> Support the Plan change in part   | <input type="checkbox"/> Support the Plan Change                          |
|        | <input type="checkbox"/> Are Neutral about the Plan Change | <input checked="" type="checkbox"/> Request amendments to the Plan Change |

**My submission is\*:**

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

PC29 would need to consider the MBIE Transforming Operational Efficiency Framework to assess the impact of Daylight admission rules (among others). Please see document attached.  
(Note that I don't think it is necessary to support this submission in a hearing, but please contact me if additional information is required.

## RMA Submission Form for Publicly Notified Plan Change 29

**I seek the following decision from the Council\*:**

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

I am only pointing out that the Plan Change 29 rules would need to be in line with the MBIE Transforming Operational Efficiency Framework requirements.

The Daylight admission rules applicable to a building project requires careful consideration (particularly in MRZ and HRZ residential zones) so the building's solar gains are maximised without reducing the thermal performance of surrounding buildings to the point of not compliance.

**Note:**

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



Environmental Planning Department  
Nelson City Council  
Civic House  
110 Trafalgar St  
Nelson 7010

Date: 15/10/2023

Re: Plan Change 29 and TOEF

**Juan Ortiz-Torrenova** is an Architecture Designer (LBP Design 1, Certified Passive House Designer, and NZIA Graduate) based in Takaka (Golden Bay).

The proposed Plan Change 29 allows for a higher housing intensification in Nelson (and potentially to Tasman as both are part of the same Tier 2 Territorial Authority – MDRS). I am aware that this Plan Change for higher intensification is a complex task, but it is also an opportunity to benefit the community increasing the existing housing stock options, and improving services, and infrastructures.

The PC29 divides the NRMP residential zone into six residential areas and proposes a new set of rules and standards such as minimum site area, height, recession planes, site coverage, yard setbacks, etc.

In particular, the Daylight admission rules are subject to changes under the PC29. This rule is important for human health and reduces reliance on artificial light, improving energy efficiency and residential amenity. These benefits are difficult to quantify accurately but the energy efficiency has become more visible due to the current commitment to reduce carbon emissions.

The MBIE is leading the Building for Climate Change (BfCC) programme as part of the NZ Government Emissions Reduction Plan to become net zero carbon by 2050. The Transforming Operational Efficiency Framework (TOEF) focuses on reducing emissions directly and indirectly attributable to the operation of buildings (housing, commercial and industrial). This framework proposes in a series of steps setting out the total allowable annual emissions per square meter per annum for all new buildings, water use cap and indoor environmental quality (IEQ) parameters to comply with.

| Step 1                                                                                                           | Step 2                                                                                                                    | Step 3                                                                                                              | Step 4                                                                                                       |
|------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| Operational Efficiency Requirements Launched                                                                     | Initial Operational Efficiency Requirements come into force                                                               | Intermediate Operational Efficiency Requirements come into force                                                    | Final Operational Efficiency Requirements come into force                                                    |
| All new buildings must report against operational efficiency requirements at consent and code compliance stages. | All new buildings must meet initial operational efficiency requirements at consent and code compliance stages.            | All new buildings must meet intermediate operational efficiency requirements at consent and code compliance stages. | All new buildings must meet final operational efficiency requirements at consent and code compliance stages. |
|                                                                                                                  | Public sector buildings must meet intermediate operational efficiency requirements at consent and code compliance stages. | Public sector buildings must meet final operational efficiency requirements at consent and code compliance stages.  |                                                                                                              |

|                                                                                                                                        | Initial Cap                                                                                                | Intermediate Cap | Final Cap |
|----------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|------------------|-----------|
| Operational Emissions Cap<br>$\text{CO}_2\text{-e}/(\text{m}^2.\text{a})^{12}$                                                         | The cap will be a reporting mechanism for the total of the operational emissions from the three components |                  |           |
| Fossil Fuel combustion emissions <sup>13</sup><br>$\text{CO}_2\text{-e}/(\text{m}^2.\text{a})$                                         | 18                                                                                                         | 9                | 0         |
| Electricity Use<br>$\text{kWh}/(\text{m}^2.\text{a})^{14}$                                                                             | 180                                                                                                        | 90               | 45        |
| Thermal performance (demand)<br>$\text{kWh}/(\text{m}^2.\text{a})$                                                                     | 60                                                                                                         | 30               | 15        |
| Services efficiency (delivered) $\text{kWh}/(\text{m}^2.\text{a})$                                                                     | 60                                                                                                         | 30               | 15        |
| Water use<br>$\text{l}/\text{p}/\text{d}^{15}$<br>(to be converted to $\text{m}^3/\text{m}^2$ based on occupancy of the building type) | 145                                                                                                        | 110              | 75        |

Thermal performance is a key element of the framework. It determines the energy demand for heating and cooling to maintain optimum indoor environmental quality (IEQ) for occupant health and wellbeing. A good solar orientation is critical to reduce the heating/cooling demand, so the building receives an appropriate amount of heat from the sun.

The TOEF final cap of  $15\text{kWh}/(\text{m}^2\text{a})$  is in line with the Passive House Certification standard and requires high performance components in the thermal envelope, efficient mechanical ventilation with heat recovery, ultra-low levels of airtightness (air changes per hour at n50), and removal/reduction of thermal bridges. These requirements are challenging and ultimately, the total energy balance will be highly influenced by the solar gains achieved.

The Daylight admission rules applicable to a building project requires careful consideration (particularly in MRZ and HRZ residential zones) so the building's solar gains are maximised without reducing the thermal performance of surrounding buildings to the point of not compliance.

The PC29 proposes for example the update of the Appendix 15 Daylight admission for residential and delete Appendix 17 Daylight admission for city centre. I would suggest reviewing the PC29 to assess the impact of the TOEF and compliance with operational efficiency requirements.

Please do not hesitate to contact me if you need any additional information.

Ngā mihi,



Juan Ortiz-Torrenova

# RMA Submission Form for Publicly Notified Plan Change 29



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

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

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

\*Required

## Submitter Details

|                 |                    |        |  |
|-----------------|--------------------|--------|--|
| Full Name*      | JOHN LEWIS MUNTING |        |  |
| Organisation    | Resident           |        |  |
| Contact Person  | above              |        |  |
| Postal address* |                    |        |  |
| Telephone*      | 035487726          | Email* |  |

|                                                                            |
|----------------------------------------------------------------------------|
| OFFICE USE                                                                 |
| Submission No: 3696                                                        |
| Date Received Stamp.<br><b>RECEIVED</b><br>16 OCT 2023<br>Customer Service |
| NDOCs No: 339570224-17680                                                  |

## Trade Competition\*

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

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

## Council Hearing\*

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

## Public information

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

Signature of Submitter\*

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

Date\*

# RMA Submission Form for Publicly Notified Plan Change 29

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

- |                                                         |                                                      |
|---------------------------------------------------------|------------------------------------------------------|
| <input type="checkbox"/> Entire Plan Change             | <input type="checkbox"/> Papakāinga                  |
| <input checked="" type="checkbox"/> Residential         | <input type="checkbox"/> Transport                   |
| <input type="checkbox"/> Inner City and City Fringe     | <input type="checkbox"/> Mapping                     |
| <input type="checkbox"/> Industrial                     | <input type="checkbox"/> Infrastructure              |
| <input type="checkbox"/> Suburban Commercial            | <input type="checkbox"/> Area outside of Plan Change |
| <input type="checkbox"/> Natural Hazards/Climate Change | <input type="checkbox"/> Subdivision                 |
| <input type="checkbox"/> Heritage                       | <input type="checkbox"/> Other                       |

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

## My submission is\*:

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

The NCC proposal has significant limitations and assumptions.

My prime area of concern is the proposed designated 6 storey block between the top of Mount St. & Hampden St.

Yes we need provision for more affordable housing. However such housing excludes multi-story construction & with costs aggravated by hillside location and accessed by limited narrow substandard streets. You may end up with the site units being only affordable to the wealthy & used as holiday accommodation & serving no real purpose to provide for the less wealthy.

The NCC proposal hints strongly that the necessity of having cars will be minimal & with people walking to the inner city & local schools. Yes some people already do this but cars etc are still required for other valid reasons. Buses for eg. are not an option due to the already substandard periphery streets that are already clogged with vehicles. Where a resource consent is not required will only create uncertainty to those who may be affected eg. will their properties become devalued & if so will the NCC payout compensation.

# RMA Submission Form for Publicly Notified Plan Change 29

I seek the following decision from the Council\*:

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

- a better understanding from NCC of what is reasonable & acceptable to an established residential area.
- construction limited to 3 story to better fit in with existing buildings.
- revised side/front yards & daylight provision to be meaningful in actually achieving & retaining direct sunlight to neighboring properties.
- provision of onsite carparking of at least 2 carparks per unit.
- a ban to disallow the likes of campervans, boats, trailers etc to be parked off site.
- consideration given to 'minimising car yards' & retoning such for residential use.
- it's been considered decades ago, & rejected, but what about utilising a portion of the tidal mudflats with allowance for rising sea levels or creating a mini Venice!

PTO

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  - b. discloses no reasonable or relevant case.
  - c. would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
  - d. contains offensive language.
  - e. is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Remember that Nelson is trending as a retirement area & single story accommodation is preferable for them.

In summary - the NCC proposal for potential six story residential buildings in an area which is predominately single storey is totally unacceptable.

# RMA Submission Form for Publicly Notified Plan Change 29



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

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

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

|                                         |
|-----------------------------------------|
| <b>OFFICE USE</b>                       |
| Submission No: 5697                     |
| Date Received Stamp:<br>12 October 2023 |
| NDOCs No: 539570224-17682               |

\*Required

## Submitter Details

|                 |                         |        |                       |
|-----------------|-------------------------|--------|-----------------------|
| Full Name*      | Philippa Katherine Vine |        |                       |
| Organisation    | -                       |        |                       |
| Contact Person  | -                       |        |                       |
| Postal address* | -                       |        |                       |
| Telephone*      |                         | Email* | phil.vine66@gmail.com |

## Trade Competition\*

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

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

## Council Hearing\*

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

## Public information

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

Signature of Submitter\*

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

Date\*

9/10/23

# RMA Submission Form for Publicly Notified Plan Change 29

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

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

- ☐ Papakāinga
- ☒ Transport
- ☐ Mapping
- ☐ Infrastructure
- ☐ Area outside of Plan Change
- ☐ Subdivision
- ☒ Other *Adjustment to parking*

I/we\*:

- ☒ Oppose the Plan Change in part
- ☐ Support the Plan change in part
- ☐ Are Neutral about the Plan Change

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

My submission is\*:

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

*and scale*  
It would change the look of  
Central Nelson if such big  
buildings were to be put there.

# RMA Submission Form for Publicly Notified Plan Change 29

**I seek the following decision from the Council\*:**

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

Limited height of buildings  
and provisions for green spaces  
in centre of city.

**Note:**

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  - b. discloses no reasonable or relevant case.
  - c. would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
  - d. contains offensive language.
  - e. is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

# RMA Submission Form for Publicly Notified Plan Change 29



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

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

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

|                                         |
|-----------------------------------------|
| <b>OFFICE USE</b>                       |
| Submission No: 5698                     |
| Date Received Stamp:<br>12 October 2023 |
| NDOCs No: 939570224<br>-17684           |

\*Required

## Submitter Details

|                 |                         |        |                       |
|-----------------|-------------------------|--------|-----------------------|
| Full Name*      | MARGARET ELIZABETH MUIR |        |                       |
| Organisation    |                         |        |                       |
| Contact Person  |                         |        |                       |
| Postal address* |                         |        |                       |
| Telephone*      |                         | Email* | Maggie.em53@gmail.com |

## Trade Competition\*

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

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

## Council Hearing\*

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

## Public information

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

  
Signature of Submitter\*

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

10/10/2023  
Date\*



Nelson City Council  
Te Kaunihera o Whakatū

# RMA Submission Form for Publicly Notified Plan Change 29

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

- |                                                         |                                                      |
|---------------------------------------------------------|------------------------------------------------------|
| <input checked="" type="checkbox"/> Entire Plan Change  | <input type="checkbox"/> Papakāinga                  |
| <input type="checkbox"/> Residential                    | <input type="checkbox"/> Transport                   |
| <input type="checkbox"/> Inner City and City Fringe     | <input type="checkbox"/> Mapping                     |
| <input type="checkbox"/> Industrial                     | <input type="checkbox"/> Infrastructure              |
| <input type="checkbox"/> Suburban Commercial            | <input type="checkbox"/> Area outside of Plan Change |
| <input type="checkbox"/> Natural Hazards/Climate Change | <input type="checkbox"/> Subdivision                 |
| <input type="checkbox"/> Heritage                       | <input type="checkbox"/> Other                       |

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

## My submission is\*:

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

I wish to voice my strong opposition to Plan Change 29 + proposed changes to housing density and locations, specifically in existing residential areas. The proposal to erect housing blocks up to six storeys high in existing residential areas is poorly conceived and inherently flawed. In addition, the proposal that resource consent is not required to build such tower blocks is misguided and merely disadvantageous to those affected by such buildings. This type of housing is well seen at Stoke and Nile Street, where most existing houses are single storey, would have a hugely detrimental effect on existing homeowners, and the surrounding area, affected by the tower blocks. Loss of daylight, sunlight, outlook, and privacy, not to mention loss of value of these homes, plus extra noise generated by the tower blocks, would all take a toll on those already residing nearby. Does the Council propose to compensate homeowners for loss of value of their property if affected by the tower blocks?

The infrastructure of existing residential areas is not designed or constructed to cope with the extra load generated by such high-density buildings. Road, storm- and waste-water systems would overload + cause further problems in the future. We already see the effects of overload during storms when drains overflow + sewage is discharged into estuaries and the sea.

High-density housing is more appropriate in the inner city centre or in new, currently undeveloped subdivisions where infrastructure could be installed... continued

# RMA Submission Form for Publicly Notified Plan Change 29

**I seek the following decision from the Council\*:**

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

- withdraw Plan Change 29 & begin afresh with proposals to increase housing density in Nelson.
- limit any high-rise buildings to the inner city centre or new currently undeveloped sub-divisions outside of and not affecting existing residential areas.
- Maximum height of such buildings to be three storeys.
- Resource consent for any proposed high-density buildings must be mandatory. Any affected persons (or concerned residents) should have the right to object to the proposals & have their concerns heard. Residents need to feel confident their concerns are heard & respected and have equal weight as builders & developers.
- Residents must be kept fully informed of any subsequent proposals by the council, with a lengthy period for submissions and the right to voice any opposition, before any changes are accepted & put into place.

**Note:**

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  - b. discloses no reasonable or relevant case.
  - c. would be an abuse of the hearing process to allow the submission (or the part) to be taken further.
  - d. contains offensive language.
  - e. is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

... continued from Page 2.

to suit such new buildings' requirements and there is no impact on existing homeowners. Increasing housing density in the inner city centre will encourage more people to live and work centrally, as well as integrating the city centre, this will decrease commuting times and volume, thus having a positive ongoing effect on climate change mitigation.

a proposal to build high-rise buildings on existing car parks in the city centre, such as Wakaba Square, incorporating the car parks into the building, is also a possible solution to increasing inner city housing density.

I also oppose the proposal to build tower blocks up to six storeys high. This is too high even for any new subdivisions and the city centre. I have seen first-hand the ongoing effects of such tower blocks in the UK, which rapidly deteriorate and become slums. Three storeys is the absolute maximum that should be permitted.

Resource consent must also be mandatory for any such housing development, and any affected residents or businesses should have the right to oppose any such structures, that would negatively affect them, and be fairly heard.

# RMA Submission Form for Publicly Notified Plan Change 29



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

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

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

|                                                                            |
|----------------------------------------------------------------------------|
| OFFICE USE                                                                 |
| Submission No: 5699                                                        |
| Date Received Stamp:<br><b>RECEIVED</b><br>25 OCT 2023<br>Customer Service |
| NDOCs No: 53957024<br>- 17688                                              |

\*Required

## Submitter Details

|                 |                                     |        |                     |
|-----------------|-------------------------------------|--------|---------------------|
| Full Name*      | James Boyd and Bridget Joyce Austin |        |                     |
| Organisation    |                                     |        |                     |
| Contact Person  | Jim Austin                          |        |                     |
| Postal address* |                                     |        |                     |
| Telephone*      |                                     | Email* | jbbAustin@gmail.com |

## Trade Competition\*

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

## Council Hearing\*

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

## Public information

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

Signature of Submitter\*

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

25/10/2023

Date\*

# RMA Submission Form for Publicly Notified Plan Change 29

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

- |                                                         |                                                      |
|---------------------------------------------------------|------------------------------------------------------|
| <input checked="" type="checkbox"/> Entire Plan Change  | <input type="checkbox"/> Papakāinga                  |
| <input checked="" type="checkbox"/> Residential         | <input type="checkbox"/> Transport                   |
| <input type="checkbox"/> Inner City and City Fringe     | <input type="checkbox"/> Mapping                     |
| <input type="checkbox"/> Industrial                     | <input type="checkbox"/> Infrastructure              |
| <input type="checkbox"/> Suburban Commercial            | <input type="checkbox"/> Area outside of Plan Change |
| <input type="checkbox"/> Natural Hazards/Climate Change | <input type="checkbox"/> Subdivision                 |
| <input type="checkbox"/> Heritage                       | <input type="checkbox"/> Other                       |

- |        |                                                                     |                                                                       |
|--------|---------------------------------------------------------------------|-----------------------------------------------------------------------|
| I/we*: | <input checked="" type="checkbox"/> Oppose the Plan Change in part  | <input type="checkbox"/> Oppose the Plan Change                       |
|        | <input checked="" type="checkbox"/> Support the Plan change in part | <input type="checkbox"/> Support the Plan Change                      |
|        | <input type="checkbox"/> Are <b>Neutral</b> about the Plan Change   | <input type="checkbox"/> Request <b>amendments</b> to the Plan Change |

**My submission is\*:**

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

We support the principal of intensification but consider the details of Plan Change 29 are unacceptable as they ignore the basic advantages of Nelson, namely the sun and green space.

We submit a different approach is desirable which has some possibility of perpetuating the access to the sun as well as ensuring there is extensive green space and, at the same time. minimising the adverse effects on existing property owners.

# RMA Submission Form for Publicly Notified Plan Change 29

**I seek the following decision from the Council\*:**

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

- 1] Treat the proposed Medium and High density zones the same, otherwise the take up will be too slow.
- 2] Increase the number of dwelling units from 3 per site in PC29 to one per 100 square metres of section.
- 3] Building height. Any new building may have one extra storey to the building it replaces. If agreement of adjoining property owners is obtained two extra storeys may be added.  
Height to side boundaries must be no more 5.5m for two storey and 8m for three storey. Recession plane for balance of building 25 degrees. PC29 heights of 3m per storey is excessive.
- 4] Site coverage with buildings not to exceed 50% and maximum site coverage for vehicle accessible area and building not to exceed 60%. This to allow for greenery.
- 5] Building to side boundaries should be encouraged. Set back from rear should be greater than set back from the front. This should give more garden area to residents.
- 6] To encourage green space any fence or wall at the front of the building should have maximum height of one metre and side and back fences no more than 1.2m unless adjoining property owners agree. Trees or hedges can be higher than this.
- 7] The current City Centre needs to be changed from a lot of low rise buildings with lots of asphalt to multi storeyed buildings [ three or more] with accommodation on higher floors. More green space required too and rooftop gardens.

**Note:**

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

# RMA Submission Form for Publicly Notified Plan Change 29



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

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

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

|                                                        |
|--------------------------------------------------------|
| <b>OFFICE USE</b>                                      |
| Submission No: 5700                                    |
| Date Received Stamp:<br><b>RECEIVED</b><br>25 OCT 2023 |
| Customer Service                                       |
| NDOCs No: 939570224<br>-17690                          |

\*Required

## Submitter Details

|                 |                |        |                 |
|-----------------|----------------|--------|-----------------|
| Full Name*      | Susan Hamilton |        |                 |
| Organisation    |                |        |                 |
| Contact Person  | as above       |        |                 |
| Postal address* |                |        |                 |
| Telephone*      |                | Email* | Sue@opaet.co.nz |

## Trade Competition\*

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

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

## Council Hearing\*

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

## Public information

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

Signature of Submitter\*

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

25 October 2023

Date\*

# RMA Submission Form for Publicly Notified Plan Change 29

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- |                                                         |                                                      |
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| <input type="checkbox"/> Natural Hazards/Climate Change | <input type="checkbox"/> Subdivision                 |
| <input type="checkbox"/> Heritage                       | <input type="checkbox"/> Other                       |

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

**My submission is\*:**

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

See attached Submission.

# RMA Submission Form for Publicly Notified Plan Change 29

I seek the following decision from the Council\*:

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

See attached Submission.

**Note:**

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  - d. contains offensive language.
  - e. is supported only by material that purports to be independent expert evidence but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

**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:**

**Full Name:** Susan Hamilton

**Address:**

**Telephone:**

**Email:** sue@opoet.co.nz

**Date:** 25 October 2023

Delete as applicable: -

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

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

Firstly, I **oppose** the Proposed Plan Change 29 (PC29) in its entirety.

If it is the Council's intention to proceed with PC29 as currently drafted then I ask that consideration be taken and amendments made as raised in my submission.

## **1) The Plan Change 29 Process**

- a) I understand that Council is not legally required under the Resource Management (Enabling Housing Supply and other Matters) Amendment Act (the Act) as a Tier 2 Council, to implement intensification and densification changes to its District Plan (Nelson Resource Management Plan).
- b) I have found it difficult to digest PC 29's content and supporting documentation due to its size and complexity.
- c) Access to a paper copy of PC 29 and the Section 32 reports has not been made available for me to read which personally makes this whole process challenging.
- d) I find the lack of pre-notification and Council's public engagement and consultation about PC29 unsatisfactory. PC29 has severe implications for me as an existing ratepayer and resident. The potential removal of enjoyment of my property has caused me unnecessary stress. This situation is replicated by many long term residents that I have spoken to who believe Council has taken no consideration of the environmental effects of this planning change.
- e) Council's 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 within the legal RMA process for public submissions in an incomplete and inaccurate state that requires the public to learn and understand its entirety so that the Council can re-design it.

### **I seek the following decision from Council:**

- Reject Plan Change 29.
- Use a co-design process where Council engages with representatives of Nelson's communities with differing interests who are committed to working together collaboratively to develop a co-agreed plan that addresses the future intensification of Nelson.

- Re notify a revised Plan Change 29 that has been developed through the above process.

## 2) Definition of Environment

I understand that:

- a) The Resource Management Act 1991 (RMA) defines"..... Environment to include:—
  - (a) ecosystems and their constituent parts, including people and communities; and
  - (b) all natural and physical resources; and
  - (c) amenity values; and
  - (d) the social, economic, aesthetic, and cultural conditions which affect the matters stated in paragraphs (a) to (c) or which are affected by those matters."
- b) The current Nelson Resource Management Plan (NRMP) contains both objectives and policies that ensure this definition is considered in the Council's consideration of resource consent applications.

PC29 proposes altering the current Lower Density Zone where I live to a High Density Residential Zone where a resource consent will no longer be required and as a consequence consideration of the NRMP objectives and policies aligned to the RMA definition of environment appear to be ignored.

For my recent Resource Consent Application received in 2022 for a residential house, Council considered the following:

- **Objective RE2 (Residential Character):** "An environment that is principally residential in character."
- **Policy RE2.4 (Privacy and Outlook):** "The location and design of buildings should not unduly compromise outlook and privacy of adjoining development and should have regard to the character of the area."
- **Policy RE2.5 (Scale):** "The size and scale of buildings should be compatible with the character and amenity of the residential area."

- **Objective RE3 (Streetscape, landscape, and natural features):** "Attractive streetscapes, and the maintenance and enhancement of those significant public views, natural features, and landscapes that contribute to Nelson's character and setting."

- **Policy 3.5 (Streetscape):** "Sites, buildings, fences and landscaping fronting onto roads should present an appearance which enhances the overall streetscape, and maintains the open, landscaped character of front yards that is typical of Nelson. Hard landscaping including car parking, should be minimised. The design of buildings, structures (including fences), roads and parking spaces (in front yards and on the street) should assist in making streets safer environments by enhancing informal surveillance, enabling community interaction, and being people-orientated."

I believe that Plan Change 29 is not consistent with these objectives and policies which have over time led to the development of Nelson as I know it today, as a City with its unique and highly valued character, a place that current residents enjoy and future residents will value.

Council's consideration of current resource consents applications in the Lower Density Area reviews the potential for adverse visual and physical dominance effects. What PC 29 proposes will have substantial visual and physical dominance effects and not retain the streetscape and residential amenity of the wider environment.

**I seek the following decision from Council:**

- Completion of a social assessment impact report that will inform PC29 and form part of the S32 Report analysis completed for PC29.
- Reinstatement of the NRMP objective and policies required for the current Lower Density Residential Zone for all proposed residential zones.

### 3) Hearing Panel

I strongly disagree with the make-up of the Hearings Panel. I am concerned with both the size and makeup of the appointed Hearings Panel. Because there will be many submissions it is likely that the Elected Members on the Panel may know submitters personally, creating potential for conflicts of interest and a need to withdraw from the hearings on that matter. It is possible that only the independent panel member would be available to hear such a submission. The Christchurch City Council is currently processing a similar Plan Change for urban intensification. It has recognised this possibility and has appointed an Independent Hearings Panel of five members, none of whom are elected councillors.

Because of past decision making on the Future Development Strategy, both Councillors will have formed at least a preliminary opinion about the need for urban intensification in the form proposed. No doubt they would be able to change this mindset, but it may take more to convince them to do so than if they were to come to the case with no previous views.

With respect I consider that the Nelson City Council has overstated the importance of local knowledge on the Hearings Panel. There are many highly qualified and experienced Hearings Commissioners in New Zealand who can and do come into hearings and focus on local issues of importance, guided by reporting officers and submitters. The issues in the case are not unique to Nelson, and similar urban growth plan changes are taking place all over New Zealand following the introduction of the National Policy on Urban Development and the introduction of the Residential Medium Density Standards. To me, it is much more important that the Commissioners have the training and experience to engage with technical experts and understand and apply technical expert considerations and evidence on technical subjects, including in this case traffic safety, parking and the engineering related to effects from the identified natural hazards.

I suggest that the Hearings Panel should have at least four and preferably five members with a quorum of three, and no more than one elected member.

**I seek the following decision from Council:**

- Appointment of a Hearings Panel of at least four and preferably five members with a quorum of three, and no more than one elected member. This aspect needs to be considered and reported to Council during the process prior to the Hearings commencement.

**4) Council's Population forecast**

Population forecasts are a pivotal aspect for the scale of which Nelson needs to enable intensification and growth. The forecasts used by Nelson City Council are not Statistics NZ medium projections, but are much higher projections that require the scale of intensification to be greater than those of Statistics NZ.

**I seek the following decision from Council:**

- Use Statistics NZ medium projection forecasts for Nelson City, as recommended by the NPSUD Capacity: Guide on Evidence and Monitoring, para 2.1.1 and amend Council's intensification requirements accordingly.

**5) Design Led versus Developer Led Growth**

- a) Nelson is a very special and unique place that needs to be protected with care. It has developed as 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 features as an essential part of the character of the Inner City.
- d) Existing 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 seek the following decision from Council:**

- Design comprehensive neighbourhood plans (as envisaged by the current "Future Development Strategy") first to provide some certainty about the form and location of future buildings, open space areas for outlook and privacy, future public and private green spaces, play areas, potential new laneways etc. Following the development of a shared Plan or Vision agreed by the community set the rules and assessment criteria that will enable implementation of this Plan.
- Conduct a co-design process where Council engages with representatives of Nelson's communities who are committed to working together collaboratively to develop co-agreed neighbourhood plans.

**6) Sunlight Recession Planes and Shading Effects**

- a) Sunlight is a highly prized part of living in Nelson. It is called the 'Sunshine Capital of NZ' for that reason. It is well documented that people relocate to Nelson because of the sun and develop and manage their properties to maximise this aspect.
- b) 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 potential effects: -
  - i) increased levels of mental health illness, anxiety and stress
  - ii) increased levels of dampness in homes

- iii) shadowing of green initiatives such as solar panels and passive solar energy heating
  - iv) increased heating costs, air pollution, carbon foot print through reduced sunlight
  - v) reduction in property values and increased financial stress, because houses effected are less desirable
  - vi) property owners reluctance to invest in developing new (low rise) infill on their section that may be over shadowed and devalued by a development of a multi-storey building(s) next door at any time in the future.
- c) Receiving daylight and sunlight to each household unit is a critical component of residential amenity that provides warmth and energy efficiency, and is also vital for outdoor activities such as gardening and recreation. PC29 provides diminished daylight controls and reduced space around building side and rear boundaries causing increased shading effects.

**I seek the following decision from Council:**

- Maintain existing NRMP AP15 Daylight Admission protection rules
- Include the NRMP existing Daylight and Sunlight policy statement RE2.3.i.

**7) Privacy and Outlook**

- a) Privacy is a critical part of enjoying a property.
  - i) I support the inclusion of NRMP RE2.4.iii, with the following word amendment.  
 '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'.

**I seek the following decision from Council:**

- Amend RE2.4.iii as above.

**8) Intensification**

- a) Align management of intensification and densification of development using the Pareto Management Principle by looking for 20% of the area where 80% of the developments will occur. This leads to development being managed centrally within the current Inner City Zone and not covering a wide area of the proposed Medium and High Density Zones. This provides higher residential accommodation close to commercial activity and the Nelson Transport Hub. There will be some specific sites outside this Zone where the remaining 20% of development can occur. The parameters for identifying such sites should be included in the NRMP.
- b) Create a General Residential Zone that includes the remaining areas with the NRMP current rules and allow for 3 units intensification up to two storeys on some adequately sized sites. There will be specific sites throughout the City where effects can be mitigated and where higher buildings can be accommodated and developed following resource consent approval with the opportunity for any affected parties to make submissions. This is all about Council managing the development of the City (one of its core tasks), not passing the initiative to other parties, and therefore minimising unintended consequences.
- c) Complete a Residential Spatial Plan that concentrates higher buildings in the Inner City and quickly reduces building heights as you radiate out from the Inner City. Generally align with the height limits that currently exist under the NRMP and enable growth in those areas through increased coverage or site specific allowed development. For this process consider using a Collaborative Process that involves representatives with diverse views e.g. Twyford's collaborative governance process (the Power of Co), that tests the aims and objectives of the proposed Plan Change, using independent urban designers with input from the community (not just those

Planners, community focus groups and others previously involved in preparation of this Plan Change).

- d) Form an Urban Design Panel to work with and assist developers create good quality design outcomes in keeping with the City's form.

**I seek the following decision from Council:**

- Reconsider Proposed Plan Change 29 densification and intensification of the City and whether the Council (as a Tier 2 council) has a legal obligation to make this Plan Change 29 at this time.
- Manage development in the City by amending the proposed residential zones to two zones (one High Density Zone and the other General Residential Zone) ) i.e. a much smaller area for higher density construction centred in the current Inner City Centre and City Fringe areas with the remainder of the City remaining with the NRMP current objectives and policies and allow for 3 units intensification up to to two storeys on some adequately sized sites. Provide for specific sites throughout the City where effects can be mitigated and where higher buildings can be accommodated and developed following resource consent approval with the opportunity for any affected parties to make submissions.
- Complete a Residential Spatial Plan.
- Form an Urban Design Panel to work with and assist developers create good quality design outcomes for the City.

**9) Progressively Phased Intensification**

Take a progressively phased approach by firstly allowing intensification in the Inner City Centre and City Fringe areas (where 80 % of such development will occur) and allow increased two storey development on appropriate sized sites throughout the rest of the City. Opportunities for greater high rise development in the Residential Zone (greater

than two storeys) could be introduced when these type of developments are known to be required. This would occur following more robust assessment to define specific areas for this type of development.

**I seek the following decision from Council:**

- Plan and progressively phase in intensification for each area of the City to an agreed timeframe.

**10) Intensification in Natural Hazard Zones**

- a) It appears that consideration of Natural Hazard overlays (with the exception of water) have been given little if no consideration in development of PC29 zones.
- b) In addition there are also earthquake and liquefaction overlays specific to a number of areas. The specific area that I live in has been zoned High Density under PC29.
- c) It is necessary to apply no greater than General Residential Zoning rules in all Hazard overlay areas. These areas have been assessed as vulnerable.
- d) Include planning for development in areas excluded from Plan Change 29 e.g. The Wood by enabling development to occur that considers and mitigates natural hazards and provides appropriate residential solutions to enable intensification and densification in these zones also. This development would support greater use of bus transport due to its close proximity to the Inner City and the relocated Bus Hub on the river.
- e) In enabling further intensification development in hazard areas is Council accepting liability for these developments. I strongly object to any financial impact of these on Council as it would be underwritten by ratepayers.

**I seek the following decision from Council:**

- Apply no greater than General Residential Zoning rules in all Hazard overlay areas.

### **11) On-street carparking**

- a) Increased intensification will result in more on-street car parking. The narrow streets of Nelson will become more hazardous for vehicles, pedestrians, mobility scooters, cyclists, E buses, refuse collection and emergency service vehicles. Neighbourly relations and communities could well become strained by increased parking and vehicle movements.

#### **I seek the following decision from Council:**

- Provide a 'Comprehensive Car Parking Management Plan' as strongly encouraged by Policy 11 of the NPSUD 2020, to mitigate these issues. This plan should be developed using a consultative approach involving representatives of Nelson's communities with differing interests who are committed to working together collaboratively to develop a co-agreed plan.

### **12) 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 needy 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 seek the following decision from Council:**

- That Council work more 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
- That Council work more closely with agencies e.g. Kainga Ora, NZ Police and other social services to develop more fit for purpose interventions for antisocial behaviour that affects an existing neighbour's enjoyment of their property.

### **13) Infrastructure**

With properties' intensification the need for infrastructure capacity will increase. Planning for new infrastructure will be required in advance of building construction to avoid infrastructure issues currently experienced by some properties particularly during weather events e.g sewer overflows.

#### **I seek the following decision from Council:**

- 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.
- Plan to increase capacity requirements for our water, waste water and stormwater systems.
- Plan to increase roading capacity where required.