

A Guide to Submitting on Nelsons' Plan Change 29 – Housing and Hazards.

Understanding the plan change and how to make a submission

What is the plan change trying to achieve?

Nelson has some of the most unaffordable housing in Aotearoa. While house prices might be slightly lower here than in our main centres, our median income is significantly lower, making housing unaffordable for many of the people who live and work here. Nelson also has a shortage of affordable rental properties and a lack of simple one- and two-bedroom apartments that are sought after by younger people and first-time home buyers. Right now, much of the new housing being built are detached, three- and four-bedroom homes in new subdivisions. While there will always be a need for new family homes in the suburbs, this is not the best approach from a climate change perspective, nor from an equity perspective. New suburbs creates more pressure on the roads and more commuter traffic into Nelson and Richmond. It also eats up green space and creates more impervious surfaces which impacts flooding. Many people have no desire for a three-bedroom house in the suburbs and would prefer a simple apartment in the city if this option was available to them, but currently, it isn't.

What the plan change wants to achieve is more housing choice. It makes more sense to build up, to use resources more efficiently, and make it easier to live without a car close to the city centre while preventing sprawl and loss of green space on the edges of the city. The plan change is designed to encourage more density in the city centre to encourage smaller apartments where people can live without a car, and to provide more of the housing that is needed for working people in the city. The areas that have been chosen for intensification are the areas with the best access to the city, making it simpler to get around on public transport or by bike. Having more people live closer to the city is also good for the city - it brings life, culture, community and economic activity into the city centre and makes it a more interesting place to be. It doesn't mean that suburban family homes will stop being built, nor does it mean that every new development will be a high rise apartment, it simply means that more options are available if people wish to build different housing types.

How do the new rules work?

The plan change will make it possible to build higher in some zones in the city, by creating three new zones – general residential, medium residential and high density residential. The maximum permitted building height in these zones is increasing, but that doesn't mean that all buildings WILL be this height. There are also many other criteria that new buildings need to meet such as the limits on site coverage, minimum landscaped area, outlook and privacy, windows, maximum building length and so on. For example, buildings in the medium and high density zones cannot cover more than 50% of the site, which is stricter than the rules that are

currently in place in the residential zone. Only when a proposal meets ALL of the standards it can be granted approval without a resource consent. If it fails on just one of the criteria, it will need to apply for a resource consent and the entire proposal will be assessed.

There is also a new rule to provide bike parking for each site and to allow for three residential units on each site. Allowing up to three residential units will make it easier for people with larger sites to help out with the housing shortage by adding self-contained units to their existing home, providing space for a tiny house, or to convert an existing large dwelling into flats. Again, the standards need to be met for these extra residential units to get approved without a needing a resource consent. This also applies to new apartment buildings, meaning any building that has more than 3 residential units will automatically need a resource consent.

There are also changes to the hazard rules that control what can and cannot be done in areas at risk from natural hazards, and changes to make it easier for Māori to build papakāinga housing.

How to make a submission

If you would like to submit, here are the different ways to do it:

- Visit shape.nelson.govt.nz and click on the 'Plan Change 29 – Housing and Hazards box.' Click on the 'Make a Submission' button on the right, then open the PDF titled 'Plan Change 29 – Housing – submission form'. You can print this form and fill it out, and hand it in to the Customer Service Centre at Civic House on Trafalgar Street.
- On the shape.nelson.govt.nz page, click on the Plan Change 29 – Housing and Hazards box. Scroll down the page to 'how to make a submission' and click on the 'make an online submission' hyperlink. This will enable you to submit online, but you need to create a login first.
- Write a letter or send an email to environmental.planning@ncc.govt.nz. Include your name, address, phone number, say you are submitting on Plan Change 29, say whether or not you would like to speak at the public hearing, and whether or not you would gain a trade advantage through your submission. Then give your thoughts on the plan change, and why.

What to comment on in the submission

In writing your submission, say what aspects you support and why, what you would like to change and why, and what you would like council to do. You do not need to be an expert or write a long and complicated submission. Commenting on one or two items is fine, as is saying you support the plan change overall. Here are some key things you could consider commenting on.

- Providing bike parking will be mandatory for each site in the new plan (this will only apply to new builds, it will not apply retrospectively)
- It will be easier for Māori to build Papakāinga housing.

- There will be up to three residential units permitted on each site (a residential unit is any self-contained household unit that is primarily used as a residence, so it includes tiny houses, caravans and house-trucks)
- Residential units will be permitted above the ground floor of any building in the inner city, city fringe and suburban commercial zones.
- Where there are 10 or more residential units being proposed on a site, at least 10% of the units must be wheelchair accessible.
- Efficient use of resources is NOT a criteria for assessment for new buildings or developments.
- Wherever there is a shared boundary with the residential zone, buildings must comply with daylight admissions requirements for the residential zone (i.e a building in the medium density zone that is on the boundary of the residential zone, must not shade the dwellings in the residential zone).

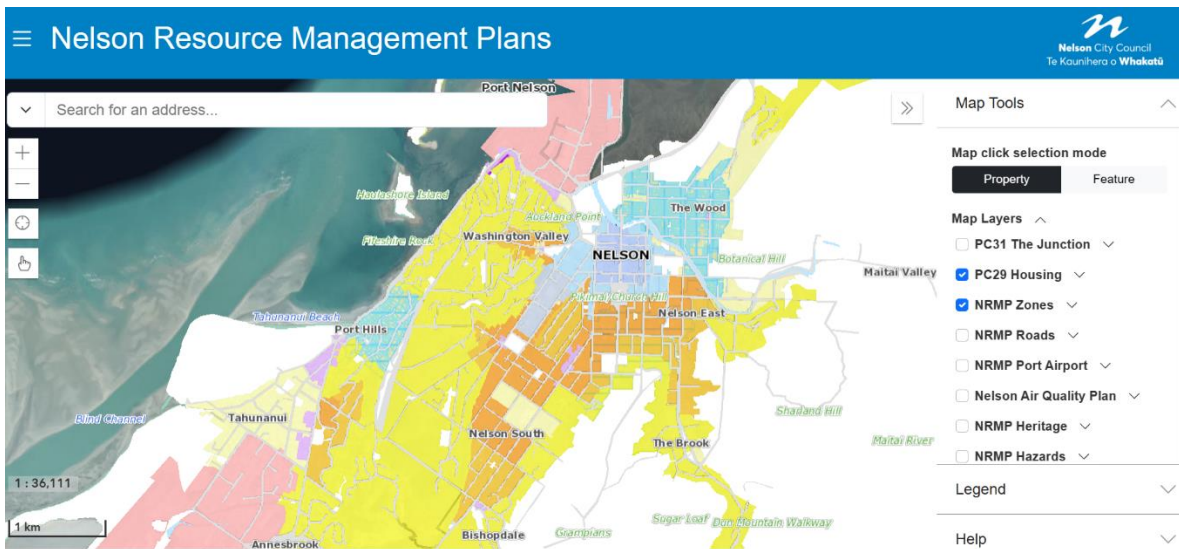
The key rules around buildings in each zone:

	Inner city	High density residential	Medium density residential	General residential
Maximum height	24 m	19.5 m	11 m	8 m
Maximum site coverage	N/A	50%	50%	40%
Minimum landscaping	N/A	20% permeable landscaping	20% permeable landscaping	20% permeable landscaping
Outdoor living court?	Requires outlook space from a residential unit.	Yes - required	Yes - required	Yes – required

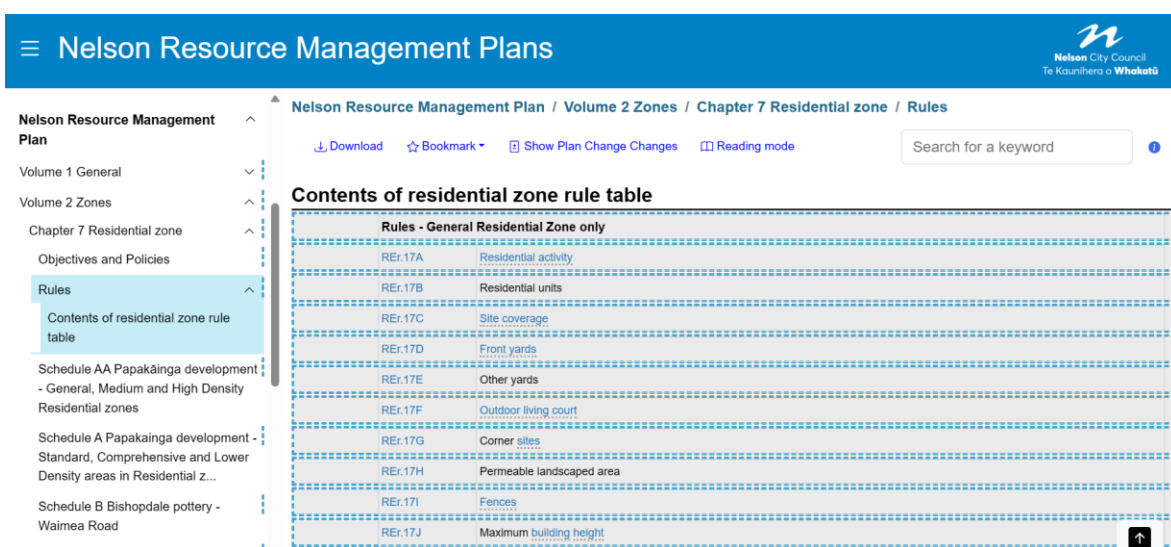
How to go deeper into the plan change and read through the proposed rule changes on-line.

If you are keen to understand the plan change more comprehensively and explore it for yourself, here's how to navigate it.

From shape.nelson.govt.nz, click on the 'view the plan change (ePlan)' button. Click on the three dashed lines at the top left hand corner by the Nelson Resource Management Plan title and click 'View the Interactive Maps.'



To see the map of the different zones, you can zoom in and out and search for an address in a similar way to google maps. By default, the plan change zones will appear on the map when you access it. To see the plan rules, click on the three dashed lines again, then click 'View the Plans' and it will take you to the entire plan change document or the 'Eplan'. There is a navigation bar to the left-hand side which is hyper linked to the different zones and appendices. Each rule table is also hyperlinked to the rule. To begin, click 'volume 2 zones' from the drop-down menu on the left, then 'rules', then 'contents of residential rule table'. This will take you to the table of rules, and you can click on each one to read it or scroll through them all. Where they are enclosed in grey with a blue dashed line, it is a new rule. If it is enclosed in a dashed line but the text is faded, it means the rule is to be deleted. The words in blue with a dotted underline are hyperlinked to their definition. The other rules are to remain the same. To see other sections of the Eplan, use the navigation bar on the left to return to either the residential zone rule table, or open up another zone, or an appendix.



For example, 17 is the rule for residential activity in the general residential zone, and items 17A – 17O are the criteria for building in this zone. Rule 18A-18U is the medium density zone, and 19A-19U is the high-density zone.

Beneath each rule is a list of assessment criteria and an explanation for the rule. These are used in assessing resource consent applications. This is an example of the assessment criteria for rule 17B.

<p>REr.17B.4</p> <p>Regard is to be had to Appendix 14 - Residential Subdivision Design and Information Requirements, and the following matters:</p> <p>a. safety and attractiveness of the street:</p> <ul style="list-style-type: none">i. whether development provides a high quality and attractive frontage to the street or public open space. This includes orientating residential units to front the street with clear and direct pedestrian access, and minimising long expanses of blank walls and at grade carparking/garage doors.ii. whether the orientation of development and the placement of doors, windows, balconies and habitable rooms maximises visibility over the street and public open space to enhance safety and security.iii. whether development optimises landscaping within the front yard to provide privacy for residential units at ground level and visual interest and safety along the street. <p>b. quality on-site living environments:</p> <ul style="list-style-type: none">i. whether principal living rooms and outdoor living spaces are orientated and designed to provide privacy between residential units and optimise sunlight access.ii. the extent to which outdoor living spaces are directly accessible from the principal living room.	<p>REr.17B.5</p> <p>This rule allows for the qualitative assessment of four or more residential units to ensure that high quality built environments are achieved as Nelson's neighbourhoods grow over time. The matters of discretion and assessment criteria complement rather than duplicate the effects that the rules seek to manage.</p> <p>This rule applies where the site is to be subdivided at the same time.</p>
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The closing date for submission is 4 pm on Tuesday, 31st of October, so please get your submission in before then, and thank you for participating.