
Submission on Napier City Proposed District Plan

Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Napier City Council - Planning Unit

Date received: 06/12/2023

Submission Reference Number #:75

This is a submission on the following proposed plan (the **proposal**): Napier City Proposed District Plan

Submitter:

Jonathan Mumford

Address for service:

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Attachments:

Submission Jonathan Mumford.pdf

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I wish to be heard: Yes

I am willing to present a joint case: Yes

Could you gain an advantage in trade competition in making this submission?

- **No**

Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

- **Yes**

Submission points

Point 75.1

Section: MRZ - Medium Density Residential Zone

Sub-section: MRZ - Medium Density Residential Zone - Standards Table

Provision:

MRZ-S1: Height

Purpose: to achieve an urban character while providing for a reasonable standard of amenity for neighbouring properties.

1. Buildings and structures must not exceed 12 m in height.
2. The following are excluded from complying with MRZ-S1 clause 1:
 - a. solar heating devices;
 - b. air conditioning units and similar structures housing mechanical and/or;
 - c. electronic equipment, and
 - d. one chimney per building.

Matters of discretion are:

1. Purpose of the standard;
2. Planned urban character;
3. Safety, attractiveness, and connectivity of streets and public open spaces; and
4. Quality living environments.

where the device, unit, or other structure does not exceed the maximum height of clause 1 by more than 2.5 m vertically and 1.0 m in any horizontal direction.

Airport Height Control

3. Buildings and structure must not exceed the Airport Height Control Designation in Appendix 1.

Matters of discretion are:

1. Aircraft and community safety.

Purpose: to maintain the safety of aircraft approaching and taking off from Hawkes Bay airport.

Sentiment: Oppose

Submission:

RE: PROPOSED DISTRICT PLAN CHANGE - OBJECTION -1/1 Peddie Street and 50 D Puketapu Road properties

The purpose of this letter is to OBJECT to the proposed plan change to create medium and high-density living areas close to the Taradale and Green Meadows villages. I have read the Napier City Proposed District Plan and I wish to have it recorded that I STRONGLY OBJECT to the proposed district rule plan changes.

In the document published by NCC entitled *Napier City Council Proposed District Plan Topic Summary: High Density Residential Zone Key Outcomes Inner City Living* the statement is made that the plan proposes to permit up to 6 storey (19.5m high) apartment blocks in an attempt to provide "for changing demographics and market demands". Furthermore, a sweeping and subjective statement is made that the suburbs generally provide for single detached dwellings on 600-900m² lots reducing choices and options for different household types within a community and therefore undermining social cohesion. Currently, there is significant social cohesion within these communities surrounding the subject villages where a combination of younger and older persons live in higher-density housing developments i.e., 2 or more units per Title; and already enjoy a social synergy that, if this plan change proceeds, will destroy the fabric of these communities. Why destroy one social structure in an attempt to create another? Additionally, why three to six-storey developments? This vertical height of both the 3 and 6-storey structures will be overbearing blocking sun and shading surrounding well-established and old "traditional neighbourhoods" and houses, changing the character and amenity value of these villages. The businesses in these villages will also be affected. When the demographic changes so will the commercial demands and likely not for the best.

In the same document previously mentioned the Council acknowledges that the proposed high-density city living is not a sound solution to the housing issue in Napier, and I quote:

'Quality Living Environments

While we need to provide for more homes to meet demand from a growing population with multiple types of typologies, this comes with increased risk of poor-quality outcomes including safety and security issues for private property, streets and public open spaces, unhealthy living environments (e.g. lack of privacy and sunlight), and reduced vegetation coverage.'

One of the key rules noted that there is "No density control or minimum lot size when resource consent for a high density development is sought at the same time as subdivision. A minimum site size of 350sqm applies if vacant lots are proposed". This directly feeds into the preceding statement, this deregulation will result in small, dark and unhealthy accommodation, effectively creating ghettos.

The same document points out that the proposed recession planes are measured at a 60-degree plane from the top of a theoretical 12 and 14m vertical elevation above the ground. The resulting permitted complying structures are likely to have a significantly adverse effect on privacy and sunlight as well as increasing the number of residents. The consequence will be more vehicle movements resulting in more air and noise pollution and adversely affecting traffic safety in these areas.

Building setbacks at 1.5m from the road reserve boundaries will negatively impact the road frontage, drastically reducing the green buffer zones and generally increasing the impervious areas that create more manmade hardstand areas increasing the "artificial living" feeling.

The document also states that "The NPS:UD directs that District Plans cannot include minimum car parking requirements for residential units". This is concerning, New Zealand does not have reliable and adequate public transport, and Napier is no different. Therefore, most citizens own vehicles to be able to work and live in this country. Which developer is going to sacrifice a dwelling and potential income for parking spaces if this is not regulated? The result is likely to be a significant lack of parking in the adjacent and nearby roads and on-street parking being at capacity with the resident's vehicles without allowing for general movement of vehicles in the neighbourhood as people go about their business. Congestion around schools and sports facilities is going to significantly increase. The main arterials providing access between the suburbs and to the motorway onramps are going to become more congested, providing significantly lower levels of service. This does not seem to have been considered or has been glossed over based on the argument that there are bus stops and routes that service these areas.

Comment is also made regarding existing services and being able to use these to facilitate the development. What needs to be borne in mind is that with developments such as these in Auckland and specifically Hobsonville, new infrastructure was installed to facilitate the development. Here the proposal seems to be to reuse the existing infrastructure that is already over 50 years old in most cases. Why not earmark areas in greenfields locations in the Napier area, and properly develop a full scheme plan that adequately addresses all the issues in an orderly and planned fashion and where people can make a conscious decision to live in or near the area as was done in Hobsonville, rather than trying to make this proposed plan change fit the existing suburbs?

Bear in mind that residential accommodations with small footprints are particularly suited to purchase by investors. It is acknowledged that rented properties are not maintained and cared for to the same standard as owner-occupied dwellings. It would appear that this plan is going to result in slums that will significantly decrease the amenity value of the suburbs and surrounding areas. There is a strong possibility that this proposed plan change may also have a negative impact on the long-term growth of the city with professionals and young families likely choosing to relocate to another part of Hawkes Bay if the intended outcomes are not achieved.

Additional has there been any consultation with geotechnical engineers with experience in liquefiable soils? Napier is located in high seismic risk area with liquefiable soils in the proposed areas of development. Are foundation costs going to make construction of 3-6 storey buildings unfeasible and has due consideration been given to the implications when we are affected by an earthquake?

Relief sought

I intensely urge the Council to give more thought to the proposed development locations and carefully consider the long-term results of implementing this plan change considering the legacy, or lack thereof that they will be creating for the long-established Taradale and Greenmeadows suburbs, not to mention the entire city of Napier.

Point 75.2

Section: HRZ - High Density Residential Zone

Sub-section: HRZ - High Density Residential Zone - Standards Table

Provision:

HRZ-S1: Height

Purpose: *to achieve and maintain an urban character while providing for a reasonable standard of amenity for neighbouring properties.*

1. Buildings and structures must not exceed 19.5 m in height.

Matters of discretion are:

1. Purpose of the standard;
2. Safety, attractiveness, and connectivity of streets and public open spaces;
3. Quality living environments, and
4. Effects on adjoining sites.

Airport Height Control

Purpose: *to maintain the safety of aircraft approaching and taking off from Hawkes Bay airport.*

1. Buildings and structures must not exceed the Airport Height Control Designation in Appendix 1, except that in a surface penetration area the maximum height must not exceed 8 m.

Matters of discretion are:

1. Aircraft and community safety.

Sentiment:

Submission:

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One of the key rules noted that there is "No density control or minimum lot size when resource consent for a high density development is sought at the same time as subdivision. A minimum site size of 350sqm applies if vacant lots are proposed". This directly feeds into the preceding statement, this deregulation will result in small, dark and unhealthy accommodation, effectively creating ghettos.

The same document points out that the proposed recession planes are measured at a 60-degree plane from the top of a theoretical 12 and 14m vertical elevation above the ground. The resulting permitted complying structures are likely to have a significantly adverse effect on privacy and sunlight as well as increasing the number of residents. The consequence will be more vehicle movements resulting in more air and noise pollution and adversely affecting traffic safety in these areas.

Building setbacks at 1.5m from the road reserve boundaries will negatively impact the road frontage, drastically reducing the green buffer zones and generally increasing the impervious areas that create more manmade hardstand areas increasing the "artificial living" feeling.

The document also states that "The NPS:UD directs that District Plans cannot include minimum car parking requirements for residential units". This is concerning, New Zealand does not have reliable and adequate public transport, and Napier is no different. Therefore, most citizens own vehicles to be able to work and live in this country. Which developer is going to sacrifice a dwelling and potential income for parking spaces if this is not regulated? The result is likely to be a significant lack of parking in the adjacent and nearby roads and on-street parking being at capacity with the resident's vehicles without allowing for general movement of vehicles in the neighbourhood as people go about their business. Congestion around schools and sports facilities is going to significantly increase. The main arterials providing access between the suburbs and to the motorway onramps are going to become more congested, providing significantly lower levels of service. This does not seem to have been considered or has been glossed over based on the argument that there are bus stops and routes that service these areas.

Comment is also made regarding existing services and being able to use these to facilitate the development. What needs to be borne in mind is that with developments such as these in Auckland and specifically Hobsonville, new infrastructure was installed to facilitate the development. Here the proposal seems to be to reuse the existing infrastructure that is already over 50 years old in most cases. Why not earmark areas in greenfields locations in the Napier area, and properly develop a full scheme plan that adequately addresses all the issues in an orderly and planned fashion and where people can make a conscious decision to live in or near the area as was done in Hobsonville, rather than trying to make this proposed plan change fit the existing suburbs?

Bear in mind that residential accommodations with small footprints are particularly suited to purchase by investors. It is acknowledged that rented properties are not maintained and cared for to the same standard as owner-occupied dwellings. It would appear that this plan is going to result in slums that will significantly decrease the amenity value of the suburbs and surrounding areas. There is a strong possibility that this proposed plan change may also have a negative impact on the long-term growth of the city with professionals and young families likely choosing to relocate to another part of Hawkes Bay if the intended outcomes are not achieved.

Additional has there been any consultation with geotechnical engineers with experience in liquefiable soils? Napier is located in high seismic risk area with liquefiable soils in the proposed areas of development. Are foundation costs going to make construction of 3-6 storey buildings unfeasible and has due consideration been given to the implications when we are affected by an earthquake?

Relief sought

I intensely urge the Council to give more thought to the proposed development locations and carefully consider the long-term

results of implementing this plan change considering the legacy, or lack thereof that they will be creating for the long-established Taradale and Greenmeadows suburbs, not to mention the entire city of Napier.

Point 75.3

Section: MRZ - Medium Density Residential Zone

Sub-section: MRZ - Medium Density Residential Zone - Standards Table

Provision:

MRZ-S3: Front yards

Purpose: *to achieve the urban character of the neighbourhood and provide for a safe and attractive streetscape.*

1. No part of any building (other than as required under MRZ-S9 Garages and accessory buildings below) may be erected closer than 1.5 m to the road boundary.

Matters of discretion are:

1. Purpose of the standard;
2. Planned urban character;
3. Safety, attractiveness, and connectivity of streets and public open spaces, and
4. Quality living environments.

Sentiment: Oppose

Submission:

Building setbacks at 1.5m from the road reserve boundaries will negatively impact the road frontage, drastically reducing the green buffer zones and generally increasing the impervious areas that create more manmade hardstand areas increasing the "artificial living" feeling.

Relief sought

(Relief sought is not included)

Point 75.4

Section: MRZ - Medium Density Residential Zone

Sub-section: Policies

Provision:

MRZ-P4: Quality living environments - within the site

Manage development to achieve a quality living environment for residents within the site, including by providing:

- a. useable and accessible outdoor living space appropriate for the location and housing typology;
- b. privacy;
- c. access to sunlight;
- d. functional living spaces;
- e. storage, and
- f. safe and accessible parking areas.

Relates to MRZ-O3

Sentiment: Oppose

Submission:

The document also states that "The NPS:UD directs that District Plans cannot include minimum car parking requirements for residential units". This is concerning, New Zealand does not have reliable and adequate public transport, and Napier is no different. Therefore, most citizens own vehicles to be able to work and live in this country. Which developer is going to sacrifice a dwelling and potential income for parking spaces if this is not regulated? The result is likely to be a significant lack of parking in the adjacent and nearby roads and on-street parking being at capacity with the resident's vehicles without allowing for general movement of vehicles in the neighbourhood as people go about their business. Congestion around schools and sports facilities is going to significantly increase. The main arterials providing access between the suburbs and to the motorway onramps are going to become more congested, providing significantly lower levels of service. This does not seem to have been considered or has been glossed over based on the argument that there are bus stops and routes that service these areas.

Point 75.5

Section: MRZ - Medium Density Residential Zone

Sub-section: Objectives

Provision:

MRZ-O5: Sustainable design and infrastructure

Public health and environmental wellbeing are maintained, and, where practicable, enhanced through sustainable design and appropriate provision of infrastructure.

Relates to GRZ-13

Sentiment: Oppose

Submission:

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Point 75.6

Section: HRZ - High Density Residential Zone

Sub-section: HRZ - High Density Residential Zone - Standards Table

Provision:

HRZ-S13: Minimum residential unit size

Purpose: to ensure

1. Residential units must have a minimum net

Matters of discretion are:

units have sufficient room to accommodate furniture, space to get around, and the anticipated number of residents.

internal floor area as follows:

- a. Studio – 35 m²
- b. 1 bedroom – 45 m²
- c. 2 bedroom – 70 m²
- d. 3 bedroom – 90 m²

1. Purpose of the standard;
2. Quality living environments, and
3. Housing supply and diversity.

Sentiment: Oppose

Submission:

One of the key rules noted that there is "No density control or minimum lot size when resource consent for a high density development is sought at the same time as subdivision. A minimum site size of 350sqm applies if vacant lots are proposed". This directly feeds into the preceding statement, this deregulation will result in small, dark and unhealthy accommodation, effectively creating ghettos.

The same document points out that the proposed recession planes are measured at a 60-degree plane from the top of a theoretical 12 and 14m vertical elevation above the ground. The resulting permitted complying structures are likely to have a significantly adverse effect on privacy and sunlight as well as increasing the number of residents. The consequence will be more vehicle movements resulting in more air and noise pollution and adversely affecting traffic safety in these areas.

...

Bear in mind that residential accommodations with small footprints are particularly suited to purchase by investors. It is acknowledged that rented properties are not maintained and cared for to the same standard as owner-occupied dwellings. It would appear that this plan is going to result in slums that will significantly decrease the amenity value of the suburbs and surrounding areas. There is a strong possibility that this proposed plan change may also have a negative impact on the long-term growth of the city with professionals and young families likely choosing to relocate to another part of Hawkes Bay if the intended outcomes are not achieved.

Relief sought

(Relief sought is not included)

Point 75.7

Section: HRZ - High Density Residential Zone

Sub-section: HRZ - High Density Residential Zone - Standards Table

Provision:

HRZ-S2: Height in relation to boundary

Purpose: to achieve an urban character; to facilitate a range of housing forms while maintaining a reasonable level of sunlight access and to minimise effects on the quality of the neighbours' living environment.

1. Within 23.5 m of the front boundary buildings and structures must not project beyond a 60 degree recession plane measured from a point 12 m vertically above ground level along side and rear boundaries.
2. Beyond 23.5 m of the front boundary buildings must not project beyond a 60 degree recession plane measured from a point 14 m vertically above ground level along side and rear boundaries.
3. Where the site abuts an entrance strip or access lot, the furthest boundary of the entrance strip or access lot may be deemed to be the site boundary for the purpose of

Matters of discretion are:

1. Purpose of the standard;
2. Housing supply and diversity;
3. Safety, attractiveness, and connectivity of streets and public open spaces;
4. Quality living environments, and
5. Effects on adjoining sites.

HRZ-S2.1 above.

4. Control HRZ-S2.1 and 2 above does not apply to a boundary adjoining:
 - a. sites exceeding 2,000 ² in an Open Space Zone or gazetted reserve, and
 - b. there is an existing common wall between two buildings on adjacent sites or where a common wall is proposed.

4. Where the site adjoins a site zoned Medium Density Residential Zone buildings must comply with MRZ-S2 on the shared boundary.
5. Where the site adjoins a site zoned General Residential Zone buildings must comply with GRZ-S2 on the shared boundary.

Sentiment: Oppose

Submission:

The same document points out that the proposed recession planes are measured at a 60-degree plane from the top of a theoretical 12 and 14m vertical elevation above the ground. The resulting permitted complying structures are likely to have a significantly adverse effect on privacy and sunlight as well as increasing the number of residents. The consequence will be more vehicle movements resulting in more air and noise pollution and adversely affecting traffic safety in these areas.

Relief sought

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Yours faithfully



Jonathan Mumford