

Oral Submission on PNCC's Proposed Plan Change I – Increasing Housing Supply and Choice
(Medium Density Residential Zone)

Name: Chris Teo-Sherrell

Scheduled presentation: 9am, Tuesday 2/9/2025 to commissioners

1. My association with Palmerston North goes back more than 50 years and I have called it home for almost the last thirty. For nine of those years, I was an elected member of this Council and was an ardent advocate for good urban design including convincing my colleagues to have Council become a signatory to the Urban Design Protocol.
2. I am also a founding member, and current Treasurer, of Living Streets Aotearoa, New Zealand's pedestrian advocacy organisation which promotes urban design, as well as infrastructure design and management, which makes it possible and appealing for many people to get about their communities on foot or in wheelchairs – in other words, to have a high degree of walkability.
3. I live in a ex-State house built in 1944 with a 2.7m stud height. Other things being equal, the changes proposed will likely increase the value of my property but my concerns are not in the least related to that. Instead, they are about wanting to create a well-functioning urban environment that will affect the lives of people in the city for a hundred years and more.
4. It has been satisfying to see Council propose a Plan Change which seeks to enable, which encourages, and which sometimes requires many of the aspects of good urban design. I am supportive of the general direction of Plan Change I. However, there are a number of matters where I believe PCI goes too far, or not far enough, or is actually inconsistent with Policy 1 of the National Policy Statement on Urban Development (NPS-UD) which requires that 'Planning decisions contribute to well-functioning urban environments, ... ' .
5. I intend to explain what I mean in regard to the proposals for height, visual connection, parking, setbacks, garages, visibility splays, permeable area and stormwater, building coverage, and home businesses.

HEIGHT

6. My concern with the height standard in PCI is primarily because of the shading effect on neighbouring buildings and to a degree the dominance effect. In my written submission, I explained the origin of my concern arising from the amount of shade my current house casts on

my neighbour's despite the height of my house being substantially less than the proposed Standard and the distance from the boundary being almost three times the proposed setback Standard. To help you make sense of the words in that written submission I am providing you with a diagram. The point is that if my dwelling already shades the vertical surfaces on my neighbour's house at the midwinter solstice, then the effect would be so much greater under the permitted height and height in relation to boundary (HIRB) standards of proposed PCI.

7. PCI proposes to set a height standard of 11m plus extensions that effectively make the standard 12m. This seems to be a direct carry over from the requirements set in the Medium Density Residential Standards (the MDRS) but it should be noted that Palmerston North is classified as a Tier 2 city and is not required to implement the MDRS. Under the NPS-UD Policy 5, which Palmerston North is required to implement, Council must allow heights which are commensurate with the greater of:

- a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or
- b) relative demand for housing and business use in that location.

8. That 11m has been chosen as the height standard seems to be driven by a particular desire for 3-storey buildings containing separate apartments on each floor to be permitted activities. In his s42A report, at paragraph 76, Andrew Burns states that he doesn't support lowering of the height standard because doing so

'would not readily enable 3 storey walk-up apartment developments that are likely to require specific engineering design with greater inter-storey heights than town houses. This is supported by my experience of providing design review for the Council observing that most 3 storey walk-up developments exceed the District Plan permitted 9m height by 1.5m or more due to inter-storey heights of 2.8m-3.2m and accommodating minimum floor levels to address flooding (refer to MRZ-S11). The 10m height and 5% exception would also reduce potential for expressive roof forms that contribute to visually interesting, individualised and attractive multi-unit developments. My experience over many years of design review for the Council is that poor quality multi-unit developments often display limited modulation and articulation of form and roof.'

9. I do not agree with his objection because

- a) Standard stud height is no longer 2.7m, having been 2.4m for many years. So inter-storey heights of 2.7m adequately provide for utility conduits and soundproofing in the ceiling to floor space

b) allowing for a 0.5m raised floor level (where necessary) and uniform storey heights would only require 8.6m of height which could be accommodated within the current 9m height limit if a flat or near flat roof was used.

c) the third storey could have a still lower ceiling especially if it is the upper floor of a three-storey dwelling and most likely to be used as bedrooms, given that most people sleep laying down. Again, this would decrease the total height necessary to enable three-storey development that contributes positively to a well-functioning urban environment through different roof forms

d) the third storey could have vaulted or some other form of sloping ceiling that could contribute to a lower building height while still enabling a diversity of roof angles and a sense of spaciousness in the third storey

e) not all developments will be three-storey. Along any given street, there will likely be three-storey, two-storey and one-storey buildings so roof line variation will be able to come from that

f) even if the afore-mentioned approaches didn't enable expressiveness of roof forms, I would hope that that aspect of creating a well-functioning urban environment would have much lower priority than access to sunlight and would be compromised, if necessary, to minimise shading effects.

10. I suggest a lowering of the height Standard and/or alteration of the HIRB Standard to minimise the shading effects on neighbouring properties while still enabling 3-storey development including buildings which have separate dwellings on each floor. I do not agree with Burns view expressed at paragraph 58 that

‘the proposed controls appropriately balance the intensification objectives with sunlight protection provisions’.

11. Burns also addresses shading particularly in paragraph 23 and Attachment A of his s42A report. He described testing that involved calculating the amount of shade cast by an 11m tall building at different times of year on differently oriented neighbouring lots. But the emphasis was very much on how much less shade would be cast under the proposed PCI standard for height and HIRB than would be cast under the MDRS. That difference would be of very little consolation to the neighbour whose property is shaded. Given that the MDRS do not have to be applied in Palmerston North, the comparisons seem much less relevant than is just how much shade would be cast. This largely irrelevant comparison was also a major part of the reasoning given in paragraph 58 for his view that the right balance had been achieved in PCI.

12. If we look at Attachment A (on pages 51-64 of the 111 page electronic version) and focus on just the relevant figures and diagrams, that is those for PCI, we see the shade cast at 10am, noon, 2pm

and 4pm at the winter solstice, spring equinox and summer solstice. I particularly draw your attention to the mid-winter figures in column 4 of the tables on page 52 and to diagrams on pages 53 and 54 although the 4pm figure is also a bit irrelevant given that at this latitude, the sun angle at that time of day is so low that shadows are long and even now most properties are heavily shaded.

13. So on page 53, the diagram shows, for Block Orientation A, about a fifth to a quarter of lot 1 being shaded at 10am and 12 noon and a half of it being shaded at 2pm. These estimates roughly match the numbers given in the first table on p52, i.e. 92, 80 and 188m² at 10am, noon and 2pm respectively. Even the figure of 92m² suggests that roughly the 3m of land closest to the boundary will be shaded which may mean that vertical surfaces built to within 1m of the boundary, as allowed under MRZ-S3, will be shaded.
14. The situation is substantially worse for Lot 2 under Block Orientation A with the diagrams showing a third, about 60 percent and almost 100 percent of the lot being shaded at 10am, noon and 2pm respectively. The table on p52 record that 131.95, 257.41 and 405.8m² of shade would be cast on Lot 2 which, even moreso than for lot 1, would mean that rooms, closest to the boundary, at ground level and possibly 1 storey up would be shaded for most or all of the day. How that could be considered a appropriate balance between intensification objectives and sunlight protection is frankly beyond me.
15. Having said all this, the diagrams and tables actually don't appear to give a full picture. The amount of shade may well be considerably greater than indicated because
 - a) firstly, the testing appears to have considered only scattered buildings and the shading effect would be much greater were every property occupied by a building built to the limits of the proposed height and HIRB standards. For lot 1, on p53, that would show as buildings occupying all 4 lots along the street running SW to NE. The shade cast by the two additional buildings would need to be added to that cast by the two buildings currently shown on the corner lots. I estimate that, with all 4 lots built on, midwinter shading of Lot 1 at 10am, noon and 2pm would be 50%, 67% and 100% respectively. And for Lot 2, if there were buildings, built to the limits of the proposed height and HIRB standards, on each of the lots to the northeast of Lot 2, on the street running NW to SE there would be an analogous increase to the total shading of Lot 2. Every lot owner will be able to build to the limit of the height and HIRB standards so such increased shading will be permissible under PCI as proposed.
 - b) secondly, the testing was done on 450m² lots, 15m wide by 30m long, but it is to be expected that with no minimum lot size standard, many lots will be smaller than this. Properties which have been redeveloped more intensively in recent years such as 164A Park Road (photo

1), 1/2 Tiraumea Street (photo 2) and 1/101 North Street are 230m², 163m² and 151m² respectively. Smaller lots will often mean the same area of cast shade will represent a larger proportion of the lot.

16. For the reasons I have stated, that is

- that 3-storey development can be carried out in a way that contributes to a well-functioning urban environment without needing to be 11m tall, (Photos 3 + 4) and

- that allowing up to 11m tall buildings will result in neighbouring lots being excessively shaded, so detracting from a well functioning urban environment,

I urge you to reject the height and HIRB standards as currently proposed in favour of lower height limits and/or greater distances.

17. The other aspect of my submission on the matter of height concerned the 50% exceedance of the 11m limit up to 12m for a roof sloping 15 degrees or more. This exception effectively makes the standard 12m which will have even more shading effects than those built to the 11m limit. I am not opposed to providing for minor exceedances, to whatever height limit is decided upon, for things like aerials and architectural features. However, they should not be so numerous or extensive that they significantly increase the amount of shade cast. Hence the 5% that I suggest as the limit for any exceedance of the 11m height (which I think should be 10m or lower as explained above).

18. What I have said so far has been to explain why I think that 11m is too high and is unnecessary to enable 3-storey development. Perhaps there is a place for 11m tall 3-storey development that takes almost no account of shading but if so I would suggest that should be confined to very small areas in what is considered the current CBD and in the immediate vicinity of neighbourhood business areas.

19. I think it should also be noted that even if a height standard were set which effectively made 3-storey buildings non-permitted activities, that wouldn't preclude their development where neighbours gave permission or where consents were sought and granted, taking shading into particular account.

20. Also, there is so much 1-storey development in the area covered by this plan change that even a change to 2-storey development, in concert with most of the other features of the Plan Change, would greatly increase the intensity of use of the area – without some of the worst negative effects.

21. Finally, I think it should be noted that effects of the height Standard (in concert with the Height in Relation to Boundary Standard) that I have outlined above seem inconsistent with MRZ-P3 (4) which indicates that structures are compatible with the planned built form of the Zone when

‘Building designs and site layouts provide a reasonable level of privacy and access to sunlight for residential units on the site and for those on neighbouring sites;’.

VISUAL CONNECTION

22. I have suggested that MRZ-P3 be amended to make it a requirement for dwellings in the lot or part of a lot adjacent to a public street to have a direct visual connection between the street and the building. My intended meaning was for people inside the ground floor of the building to be able to see most of the frontage of the lot and for people on the street to be able to see the windows in the front facade. Andrew Burns addresses this in his paragraphs 43 and 44, the latter saying

‘I do not support this submission because a legible connection between the dwelling frontage and the adjoining street does not need to have a direct visual connection. Legibility can be achieved in other ways including the appropriate design of pathways, landscape structure, building modulation (e.g. canopy projections) and frontage fenestration. The submission would conflict with the front door orientation standard (MRZ-S13) that enables entrances to be located along a side façade. In such cases the entry may not be visually direct but equally as well achieved by the techniques noted above.’

23. It seems that my comments have been misinterpreted as being to do with legibility. I was trying to address the fact that some people who live in front lot dwellings may comply with the requirement to make 2/3 of any fence along the front boundary visually permeable but then subvert its purpose by erecting a secondary fence (Photo 5 and 6) or by planting and maintaining plants between the boundary and the front facade (Photo 7) so as to block the view of the street from the dwelling and of the facade from the street. This is inconsistent with proposed Objective 2 (a) and (b) which are that

‘Built development* in the Medium Density Residential Zone positively contributes to achievement of a predominantly residential urban environment that

a. Comprises well-designed buildings, sites, streets, and neighbourhoods;

b. Supports safe and secure environments that align with Crime Prevention through Environmental Design (CPTED) principles;’.

24. Not being able to see the facades of buildings adjacent to the streets, whether because of tall fences, garages or vegetation is not consistent with achieving well-designed streets and neighbourhoods primarily because it is so inconsistent with CPTED principles that emphasise maintaining good visibility and providing passive surveillance of streets from the buildings on adjoining properties.

25. This is especially important for some sectors of society who are deterred from walking because of safety concerns.
26. It also does nothing to encourage the sort of human interactions that build neighbourhood relationships and social capital.
27. My suggestion doesn't mean that no vegetation over a certain height would be permitted between the front facade and the street boundary, only that direct visual connection should be maintained over the majority of the frontage. That would allow specimen trees to be located there acknowledging that for a relatively small number of years they would temporarily occupy the height range that would limit visibility. But it would restrict the use of hedges and some shrubs.
28. My suggestion would have no impact on the location of the front door of the front dwelling.
29. In meetings with officers and consultants it has been suggested that to require vegetation to be kept below a certain height is unworkable or goes beyond what is reasonable but I disagree. It could partly be achieved through planting plans having to be approved before plants are planted and partly through reactive or proactive monitoring.
30. There is already a requirement in performance standard 20.4.2(a)(vi)(h) to keep vegetation below 0.5m in a visibility splay where a driveway meets a footpath. This isn't considered unreasonable because there are clear safety benefits that result from it. Exactly the same can be said for maintaining visual connection between the front facade and the street. Maintaining visual connection between the ground floor of the front dwelling and the street would only require vegetation height to be kept below about 1m or above 1.8m which would still provide for a considerable choice in plantings.
31. If people don't wish to see the street or provide passive surveillance, perhaps they should purchase dwellings not on front lots.

GARAGES – height, setback, width, parking and orientation

32. I made five points about garages in my submission. One was that garages should be permitted up to 4m in height. This was to provide for the possibility of vertical stacking of cars as shown in Photo 8, or installation of a mezzanine floor. It would enable more efficient use of land on the sort of small lots likely to arise as a result of the proposed Plan Change. The garages should still have to comply with HIRB limits.
33. The second point was that setbacks from side boundaries should be able to be zero when there are no windows or doors in the wall and the wall meets fire safety and sound proofing regulations.

This actually refers to all parts of the building not only garages. As Andrew Burns said in his paragraph 91, this would improve the efficiency of use of the land. He also suggests that it be subject to a 2.8m + 45° HIRB which I agree with but which is not consistent with the absolutely absurd HIRB proposed in this Plan Change of 5m at the boundary and a 45° recession plane.

34. My third point was that allowing a garage to occupy half of the width of the front facade is excessive. A garage that wide dominates the ground floor of the facade and decreases the opportunity for ground floor level passive surveillance of the street from habitable rooms. Allowing garages to be 4m tall as I have suggested would help offset any loss of garaging space that decreasing the width of the garage to no more than 1/3 of the front facade would cause.
35. My fourth suggestion, and this is the one that I consider equally most important, is to require the facade of front facing garages on front lots to be at least 6.5m from the boundary with the street. This is because of the inconvenience and danger caused to pedestrians by vehicles, parked in front of garages positioned closer to the boundary, sticking out beyond the boundary. Photo 9 shows a typical example. In case it was not clear in my written submission, I request that the 6.5m should apply to all uses of the land in the proposed MRZ not only to community houses or health facilities.
36. I was honestly quite shocked to read Ms Fraser's response to this suggestion. She said

‘I also note that in cases where there is a boundary berm along the street frontage that additional length is available before a vehicle overhangs the footpath. A further point is that if needed, pedestrians can move slightly into the vehicle crossing keeping on a paved surface.’
37. This seems to be implying that it is alright for people's vehicles to occupy public space by overhanging any berm that may be present. And then it appears to say that pedestrians should just go around vehicles jutting out. Without being unkind, I think that is absolutely inappropriate advice that should be rejected. The law states that vehicles may not stop or stand on a footpath. That is taken to include ‘overhanging’ by all Councils I have communicated with on the issue. Further, many of our streets including our longest ones, such as Church and Ferguson, have no berms for much of their length so any vehicles overhanging the boundary are necessarily overhanging the footpath.
38. This issue has particular importance to visually and mobility-impaired pedestrians who may not readily be able to find or make their way around a vehicle or to negotiate a sloping vehicle crossing. And they shouldn't have to do so. The footpath is for pedestrians not for parking on or overhanging.

39. In my written submission, I cited the draft Australia-New Zealand Standards for off street parking spaces as being based on the 85th percentile base dimension of cars in the fleet being 4.9m and the 99th percentile being 5.4m long. I also pointed out that those measurements were the base dimensions and excluded common attachments such as tow bars, bike racks and bull bars as shown in Photos 10 and 11. This fact seems to have been ignored. I also pointed out that these lengths are probably increasing as the popularity of double cab utes and similarly long vehicles increases. Given that this plan change will have effect well into the future, the future vehicle fleet should be considered alongside the existing one.
40. Providing only 5.5m between the boundary and the garage facade allows too little or virtually no room for people to walk between the vehicle and the building. Most people drive onto their properties in a forward direction and then, if there is not a direct line to the building entrance, they walk around the front of their vehicle. To do so requires space, which is why people are inclined to park with their vehicles overhanging public land, including the footpath.
41. I am 43cm wide at the hips and the distance between the outside of my forearms when hanging naturally at my sides is 65cm. Also if I am carrying a suitcase or shopping bag my effective width will be wider still. Many people are considerably wider. Additionally, there is a well-established shy zone, which people avoid when walking, that is typically 15cm wide on each side. From these figures I conclude that an additional length of more than a metre is required to help ensure that any parking space in front of a front facing garage on a front lot is long enough to fully accommodate parked vehicles without overhanging public space or blocking the footpath and providing a walking space between the vehicle and the garage. That is why I suggest 6.5m be the minimum length of any parking space in front of a front facing garage on front lots.
42. On a related note, I saw that in Andrew Burns' paragraph 92a he is rejecting a proposal by Council that would remove the requirement to have at least 2.5m between the front boundary and the facade of a front facing garage, despite Harriet Fraser advising him that it is likely to lead to accessibility issues along the footpath. A 2.5m setback is among the worse lengths that could be chosen, as it invites people to park a little on the lot and mostly out over the footpath, even for small cars (Photo 12). Other intermediate setbacks are just as bad (Photo 13 has a setback of about 4m). These photos have mostly been from medium density areas elsewhere in the country but the very same behaviour is likely to happen here. Photo 14 gives an example of the effect of an inadequate garage setback on College St near the Awapuni business area.
43. I suggest that the setback standard require any garages be set back no more than 0.5m (so that any garage door doesn't open over public land) or at least 6.5m as explained above. The photos just

shown reveal that anything in between is likely to lead to people parking over the footpath, undermining the objective of creating a walkable environment.

44. The fifth point I made about garages was that garages not be permitted to be oriented parallel to the street in front of the main dwelling on front lots. This is because of the highly negative effect such garages have on the visual connection between the street and the front dwelling and because of the increase in hard surfaces they require, especially if vehicles are required to exit such lots in a forward direction as I understand Figure 8 (MRZ-S17 on-site vehicle manoeuvring) to be indicating. Given that the typical garage is more than 6m long and many lots are 15-16m wide, side-on garages are likely to conceal more than 50% of facade of the front dwelling. Photo 15 shows an example.
45. The MRZ Standards proposed don't seem to have any limit on the portion of the facade that is hidden by a garage oriented side-on in front of the dwelling facade on a front lot comparable to that for the proportion of the front facade that a front facing garage can occupy. This seems particularly strange given the former has an even worse effect on the street than the latter. It would be better to simply not permit side-on garages to be in front of the dwelling on a front lot whether attached or detached from the main building.

VISIBILITY SPLAYS

46. At point 32 of my written submission I requested that the exemption to the Vehicle Access Rule 20.4.2(a) that meant that visibility splays are not required for developments that involve 3 or fewer dwellings with access onto a Local road not apply to the MRZ. Harriet Fraser, on pages 11 and 12 (13 and 14 of the electronic version) of her s42A report supported my request. I just want to make clear that I was requesting that there be no exception, no matter the number of dwellings involved nor the type of street. Pedestrians are just as vulnerable to injury on local streets as on main streets and these days there are sometimes 4 or more vehicles associated with even a single dwelling so there may be a considerable number of vehicle movements in and out of driveway each day. Removing the exemption would be consistent with making the MRZ a more walkable area.

PERMEABLE AREA

47. I sought (submission point 51) that the Permeable Area Standard be increased from the proposed 30% to be all areas not covered by the dwelling and accessory buildings. This is because the greater permitted Building Coverage Standard and the smaller lot sizes likely to result from the Plan Change are likely to lead to increased stormwater runoff. Already, there appears to be areas in

the city that are subject to increased surface flooding and this is likely to increase as the frequency and intensity of intense rainfall events increases further. The proposed changes are likely to exacerbate this.

48. Given that permeable paving has existed for decades and that, with appropriate maintenance, it can perform as new for many years, I see no reason to not require all paths, driveways and outdoor parking areas to be made using it or some other permeable material. I refer you to a publication by Crossland and others which reported on the performance over time of various forms of permeable paving and the effect of periodic cleaning and maintenance on that performance.
<https://productspec.co.nz/media/qoldtq3e/the-long-term-performance-of-pervious-paving-technical-paper-from-stormwater-conf-2016.pdf>

STORMWATER ATTENUATION DEVICES

49. On a somewhat related note, I supported the requirement to have stormwater attenuation devices. I have been satisfied that the size required is sufficient to cope with most common rain events but ask you to note that 18 litres per square metre of roof surface may not be sufficient to cope with rain events occurring somewhere between every 2 and every 5 years. Maximum one hour rainfall intensities of 16mm and 22mm are predicted to occur at those frequencies in Palmerston North (NIWA, 1946-2016 data, site ID E05363 at Palmerston North CRIs, using RCP 2.6 climate scenario).
50. Strangely, what isn't said in connection with the stormwater attenuation tanks is the outlet size. It is this that largely determines how effective they are in attenuating stormwater discharge rate so I suggest this aspect should be specified in the Plan.
51. Also, the Stormwater Attenuation Device Standard proposes that any above-ground stormwater attenuation tank must be located in a side or rear yard. This seems inappropriate to me. Currently the Plan Change proposes to allow garages to be oriented parallel to the front boundary in front of the dwelling but is wanting to restrict putting a stormwater attenuation device in front of the dwelling. The visual impact of the garage is likely to be far greater than any attenuation device. Furthermore, an attenuation device could be a broad tank only 1m tall, sitting on the ground. It might be used as part of the outdoor living area or may be used for standing potted plants on. Other tanks may be partly in the ground and partly above - is that an above ground tank or a below ground tank?. It seems overly restrictive to not allow these types of devices in front of the dwelling and would add flexibility. Low vegetative or other screening could also be required if thought

necessary. Of course, they should not impinge on the visual connection between the front facade and the frontage.

BUILDING COVERAGE

52. I support the 50% Building Coverage Standard (MRZ-S4) but I think that it should not exclude the first 600mm of any eaves as eaves contribute to both the total stormwater generation and the sense of dominance of a building. The exclusion seems to mean that building coverage can actually be as high as 59 or 60%. For example, on a 100m² site, a square building 7.07m by 7.07m at floor level would occupy 50% of it. If there were eaves of 600mm they would take the area covered up to 59%. Even for a 10m by 10m, 100 square meter building on a 200 square metre site, additional 600mm eaves take the coverage up to 56%. These do not seem like insignificant increases and I request that the entire roof area be counted rather than the floor area.

HOME OCCUPATIONS

53. I am fully in support of creating a residential zone of medium density with abundant non-residential activities so that there are lots of destinations for people to go to near where they live. Without destinations a limited number of people are inclined to walk. Dr I-Ting Chang of the University of Auckland recently commented that of three major factors affecting the incidence of walking – a fine grained network, natural and designed features that make walking pleasant, and the number of destinations such as corner stores, cafes, libraries – the latter was the most important. (https://newsroom.co.nz/2025/08/18/why-arent-we-walking-more/?mc_cid=ee13811ab5&mc_eid=6e79b89948).
54. So I support home occupations being provided for but believe that these should be quiet and clean and limited in the hours they can operate so as not to undermine the primarily residential purpose of the zone. For that reason, I have requested that the hours of operation be no longer than 7am-7pm. Alternatively, differentiation could be created between local streets and connectors given the higher general noise level from traffic on the latter.
55. On a related note, I have requested that the exemption from the prohibition on the repair, alteration, restoration or maintenance of motor vehicles or internal combustion engines, or the spray painting of motor vehicles, for residents' own vehicles be removed. Apart from very minor maintenance such as oil changes, changing tyres etc, these activities have a high likelihood of adversely affecting neighbours through noise, dust and fumes. They can, and in my recent experience, do go on for extended periods. That they are being done on a resident's own vehicle

should be irrelevant – it is the effects that should be considered and these are likely to be similar whether the work is on the resident’s own vehicles or not. Furthermore, the exemption provides for the intent of this home business restriction to be subverted by the person working on their own vehicles and then selling them once repaired, restored, altered, sanded down or spray painted.

One final point

56. Something that we have recently learned is becoming a common problem in areas of higher density residential development elsewhere in the country is the charging of electric vehicles on the roadway by trailing a charging cord out over the footpath and berm. (Photo 16). This poses real danger to pedestrians and although there is provision in Council’s Use of Public Places Bylaw to take action against such a practice it would be better to incorporate something in the District Plan that would make it unable to be done so that it doesn’t become a problem here, given the enforcement is inadequately resourced.

ENDS

Photo 1 - 164 Park Rd - roofline



Photo 2 - 2 Tiraumea St



Photo 3 - 420 Church St 3 storeys 2



Photo 4 - 422 Church St 3 storeys 2



Photo 5 - 356 College St secondary fence in front lot



Photo 6 - 546 Church St close up of secondary fence immediately behind visually permeable one



Photo 7 - 546 Church 1 vegetation blocking visually permeable fence in front lot



Photo 8 - car parking hoist 1 resized



Photo 9 - Jack Lachlan Dr, Pine Harbour AKL 2



Photo 10 vehicle with towbar sticking out over footpath (11 Nola Dawn Ave, Ardmore, Papakura, AKL)



Photo 11 vehicle with bull bars spanning footpath where setback is about 2-2.5m (18 or 20 Herekino St Westgate AKL)





Photo 13 vehicles sticking out over footpath where setback is about 4m (88 Farmer Cres Taita Lower Hutt)



Photo 14 - vehicle sticking out over footpath where setback is 1.5-2m (118 College St PN)



Photo 15 -33 Oxford side-facing garage





Photo 16 - EV charging cord over footpath 31 Selbourne St Grey Lynn AKL