

# Resource Consent Application

Form 13

Under Section 96 of the Resource Consent Management Act 1991.



Reference Number:

RCS240701638

Submitted On:

01/07/2024 04:50 p.m.

## Person making submission:

Surname

More

First Name(s)

Ron

Address

507A Childers Road, Te Hapara, Gisborne 4010

Mobile

Other phone

8679750

Email

ron@digimail.co.nz

## Submission on:

Application No

APPLICATION - NZHG Gisborne Limited - 99A Stanley Road - LU-2023-112110-00 (Full)

Name of Applicant

NZHG Gisborne Limited

Type of resource consent applied for

1. Land use consent to construct eight dwellings as a Restricted Discretionary Activity pursuant to Rule 1.6.1 (17). 2. Land use consent as a Discretionary Activity pursuant to Rule 6.2.3(13) for point source water discharge. 3. Subdivision consent to create an eight-lot fee simple subdivision as a Discretionary Activity pursuant to Rule 10.1.6 (9). 4. Resource Consent is also required pursuant to Regulation 10 of the NES-CS (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) as a Restricted Discretionary Activity.

Brief description of proposed activity

Subdivision and construction of high density social housing on 99A Stanley Road

Position on application

I oppose the application

Clearly state which parts of the application you support or oppose or wish to have amended:

I oppose what traditionally for Gisborne, is an extreme level of housing density. My other objections arise from this factor including:

1. Impact upon and incompatibility with neighbourhood amenity values such as:
  - a. Impossibly small site areas,
  - b. Grossly excessive site coverage,
  - c. Repetitive, box like and unimaginative style of construction,
  - d. Highly negative visual impact on the surrounding streetscape due to style and height etc.
  - e. Lack of attractive, sunny and useable outdoor living space and natural environment.
2. Inadequate onsite parking, putting excessive pressure on nearby street parking,
3. Highly dangerous location of the street crossing due to its close proximity to the Childers Road, Stanley Road roundabout and because it will be servicing so many onsite families and vehicles, including those of visitors etc.
4. Street crossing that for practical purposes is highly inadequate and presents an endangerment to residents when using it, and also to passing vehicles, other road users and foot

**The reason for making my submissions are (briefly describe the reasons for your views):**

**I wish the Gisborne District Council to make the following decision (give details, including nature of any conditions sought):**

**I wish to speak at the hearing in support of my submission**

**Would you consider presenting a joint case with others who have made a similar submission?**

[Common Boundary Fence.docx](#) (521 kb)

[Submission - R. More Re. 99A Stanley Road.pdf](#) (549 kb)

traffic,

5. Potential to seriously block traffic flows along Stanley Road in both directions and extending to include the roundabout,

6. Onsite endangerment to resident pedestrians and particularly young children due to the close proximity of the driveway to the unprotected footpath and surrounding buildings.

7. Almost absolute lack of privacy both onsite and for adjoining neighbours,

8. Predictably excessive background and peak noise levels that will be further exacerbated by hard, reflective onsite surfaces and close proximity to neighbours,

9. Research and incident based expectations of worrisome levels of antisocial behaviour,

10. Severe reduction in adjoining and neighbourhood property values,

11. Implied intention to make changes to and/or indirectly weaken the stability of the existing common boundary fence/wall with 507A Childers Road which we expressly forbid.

Please see my accompanying submission file "Submission - R. More Re. 99A Stanley Road"

Decline the application until my objections and concerns are adequately addressed.

No

Yes

## Confirmation

**Are you submitting this form on behalf of another person?**

Yes

**Name**

Myself and the Trustees of the More Family Trust J and the More Family Trust R, the latter being joint owners of the property at 507A Childers Road.

**Postal Address**

507A Childers Road Te Hapara Gisborne 4010

**Mobile**

**Other phone**

**Email**

ron@digimail.co.nz

**I confirm that all the above details are correct.**

Yes

**Common Boundary Fence - View Looking NE**



**Common Boundary Fence - View Looking South**



01 July 2024

## Submission

### Re. Proposed 99A Stanley Road Subdivision

To Whom It May Concern

Thank you for your notification letter of 1 June 2024, inviting the writer to review the NZ Housing Group Ltd Gisborne Resource Consent Application and the Councils related Notified Decision Report.

I have downloaded the files via the link provided and to the extent that it is of importance, have assumed that NZHG (the Applicant) is to redevelop the site on behalf of Kianga Ora, a NZ Government owned crown entity. That being said, I wish to point out that the use I have made of the many recent reported news items and events involving either Kianga Ora or its social housing complexes, is not intended to single out the corporation for particular blame or criticism, and nor are my views or conclusions dependant on Kianga Ora becoming the eventual landlord of the subject housing subdivision. The materials instead are quoted to draw attention to the potential downside human behaviours that have been associated with recent social housing developments that are built to the high density level that the Applicant intends.

I wish to respond to the proposed development on behalf of the owners of the property at 507A Childers Road and also myself with the following information and personal assessments:

## Vehicles

### Traffic Density

**Important:** Please note that the development site at 99A Stanley Road is only 20m from the Childers Road/Stanley Road roundabout (CSR).

Childers Road is one of the major arterial routes across Gisborne City, allowing residents as far afield as Chalmers Road to drive directly into town. Stanley Road serves as an important connection between Childers Road and Gladstone Road, where the latter is the main route through town. The CSR is thus always in use and becomes a significant choke point for road traffic on weekdays when traffic volumes reliably peak at particular times each day.

1. From 7:30am onwards the CSR becomes overloaded and traffic backs up while workers head into town or to the Industrial Subdivision.
2. At around 8.00am, school buses as well as mum's and dad's in their cars and 4WD's begin to descend on the area to either look for temporary parking on Stanley Road so they can drop off students at the Boy's High School, or to travel on until they find an opportunity to drop off students who attend the Girls High School. Boy's High students who have their own vehicles also arrive and fill up the parking areas along School Road and sometimes spill over into Stanley Road. At such times, traffic on Stanley Road reduces to a crawl and intermittently stops altogether.
3. As noon approaches, a number of workers and shoppers head home for lunch through the CSR. They arrive from both the CBD and also the Industrial Subdivision.
4. As 3.00pm draws near, the High Schools traffic phenomenon repeats all over again but in reverse mode and traffic on the surrounding roads almost comes to a stop.



5. 4:30pm signals the arrival of employees from both town and the Industrial Subdivision as they head home through the same CSR.

When these peak flows occur, it is not unusual to see the traffic on Stanley Road back up north of the CSR until it fills up both lanes and extends past School Road. Similarly, it is common at these times for east bound traffic in the northern lane of Childers Road to back up past Centennial Crescent.

On the weekends, traffic through the CSR is steady, providing convenient access to the CBD and on Saturday mornings, to and from the Industrial Subdivision. On Saturday mornings it also enables many of the participants as well as a large number of spectators to attend sporting activities at the nearby netball courts opposite the YMCA and other adjacent venues such as the Oval Reserve the Rectory Field. When major sports events occur at the latter venue, attendees typically fill all the nearby available street parking and spill over onto the grass verges along School Road and Bayly Street.

At any hour of the night, it is fortunately infrequent but by no means unusual to hear the squeal of tyres as vehicles burn off rubber transiting through or repeatedly circling the CSR. Last night was a case in point.

I am aware of at least 2 fatal vehicle accidents that have occurred at the CSR and also an occasion when a vehicle crashed through the concrete block boundary wall that protects the occupant of 493 Childers Road.

## **Kerb Crossing**

The proposed kerb crossing at 99A Stanley Road will be physically 5.5m wide. The immediate and adjoining area of driveway it services is also 5.5m wide but then quickly tapers down to a width of 4m and remains so until it nears the rear of the property.

By scaling the dimensions shown on the Applicants site plan, I estimate that widest portion (5.5m) of the driveway extends rearwards onto the property to a maximum depth of only 4.3m before the tapering begins.

## **Parking**

### **Onsite**

Lots 1 – 6 make parking provision for single car families but not their visitor's vehicles. If the residents have more than one vehicle, any extras and those of visitors will have to park on Stanley Road.

Lots 7 and 8 make provision for two car families but not for the vehicles of their visitors.

All 8 dwellings are expected access Stanley Road via a single driveway that for the most part is one lane in width.

To avoid blocking the driveway, any resident owned vehicles that cannot be accommodated onsite, as well as the vehicles of all visitors will have to find parking on Stanley Road.

### **Street**

On the nearside of Stanley Road, there are at most, 7 available car parks between the CSR and School Road, and if the width of the kerb crossing for the proposed subdivision does not exceed the minimum requirements of the TRMP (5.5m), there will 2 further car parks available immediately outside on the street. However, whenever the latter parks are occupied, it will greatly add to the difficulties experienced by drivers as they exit the subdivision by obstructing their view of nearside traffic coming towards them from the nearby CSR. The Applicant acknowledges this potential difficulty by stating on P.41 of the Application for Resource Consent (Application),

*“....the crossings are located on a straight stretch of Stanley Road and will be provided with unobstructed sightlines so as to ensure safe and effective movements onto and off Stanley Road”*

Accordingly, the possibility of parking immediately outside the subdivision should be prohibited by the addition of broken yellow lines adjacent to the kerbing.

Given the potential shortfall in parking provided onsite, we can assume that residents and their visitors will make constant use of the two parking spaces immediately outside the subdivision (if they are permitted to remain) and then regularly occupy the 2 parks that are next along from the subdivision outside 99 Stanley Road.

If these parks are unavailable, residents and their visitors can be expected to park directly across the street rather than having to walk back from any of the more distant parking spaces that are located further along the nearside of Stanley Road in the direction of School Road.

It must be concluded therefore, that much to the annoyance of the nearby neighbours (and their visitors) on both sides of Stanley Road, residents living at 99A Stanley Road will dominate the use of any and all nearby street parking spaces. That is clearly undesirable and will quickly create tensions between the residents at 99A and their neighbours, when the latter find themselves disadvantaged by the Applicants failure to provide sufficient parking onsite at the subdivision.

## Onsite Movement

The single long driveway that will service the subdivision is referred to as the “jointly owned access leg” (JOAL) and for the most part, is physically only 4m wide and thus too narrow for vehicles to pass by each other when travelling along the JOAL in opposite directions.

As pointed out on P. 1 of the Councils Notified Decision Paper, the JOAL does not comply with the width requirements of the TRMP Standard which specifies a minimum width of 5.5m when the proposed number of dwellings are serviced by a single access way.

It will however be possible for vehicles to turn around and reverse direction of travel onsite, but the physical dimensions to facilitate such manoeuvres are at an absolute minimum and given that much of the time, as many as 10 vehicles may be parked onsite, the dimensional constraints ensure there will be relatively few occasions when drivers will be able to drive along the JOAL without having to wait, give way to others who need to turn or reverse across their path, or decide who has the right of way in respect vehicle(s) who wish travel in the opposite direction to them.

The constraints will not only be inconvenient to residents and visitors alike, but in all likelihood, will quickly become a source of frustration, friction and eventually long term resentment and animosity between residents. These realities are unfortunate and with more considerate planning, are avoidable.

Over and above the challenge of living at close quarters with neighbours with whom one may not always see eye to eye, the combination of an inadequate driveway and the much less than ideal onsite vehicle parking is on its own, a potent formula for creating hostile interpersonal relations and the potential for a special kind of very local and personalised road rage. If the likelihood of the latter possibility seems remote, please read the articles at the links below in full, taking note of what is stated in the Order of the Tenancy Tribunal when it found in favour of the complainant.

*In one case, Kāinga Ora was [ordered to pay a solo mother \\$2500](#) in compensation after nearly a year of property damage], verbal abuse and an attempt at running her down with a car.*

*[Kāinga Ora policy costs thousands in compensation to neighbours abused by unruly tenants](#)*

## Dangers Arising

### Context

As already highlighted, the site on which to build the new homes is located approximately 20m from the busy CSR on Childers Road.

On P.20 of the Application for Resource Consent, the Applicant originally proposed that residents of Units 1 and 2 gain access to Stanley Road by reversing their vehicles onto the road across a shared cycleway and into the path of vehicles exiting the nearby CSR, notwithstanding that as they rounded the corner, the latter drivers will have been partially unsighted by the dwelling at 495 Childers Road and thus have very little time to react if they come upon an obstruction that is close to the CSR.

The Applicant is aware that there are risks involved because on P.41, they state:

*"In regard adverse effects of the infringements, we note that these will be temporary until such time as the subdivision is complete. Regardless, the crossings are located on a straight stretch of Stanley Road and will be provided with unobstructed sightlines so as to ensure safe and effective movements onto and off Stanley Road,"*

However on P.41, the Applicant also claims, *"that reverse manoeuvring onto Stanley Road is not uncommon and to our knowledge there has been no issues."*

On P. 56, it is again claimed:

*"The proposed development provides for car-parking and compliant manoeuvring for Lots 3-8, with Lots 1 and 2 safely reverse manoeuvring onto Stanley Road."*

The insertion of the word *"safely"* above is in itself an acknowledgement that a degree of risk attends the manoeuvre, but claiming it is safe does not make the risk go away.

The statements on P.20, P.41 and P.56 are an indication of the level of consideration that the Applicant has factored into the proposal in regard to vehicle use and resident safety. While stating that they do not know of any reverse manoeuvring issues, the Application provides no assurances that an adequate attempt has been made to assess and discover what the reality on the ground actually is for the specific location of their development site, despite the critical nature of the issues at hand. Therefore I consider that their assertion that, *"reverse manoeuvring onto Stanley Road"* is without attendant issues, is misleading and unfounded. For the purposes of gaining Council approval, I believe that they have downplayed the obvious risks that attend driving on and off sites that are very close to a busy roundabout.

The development site is only one property removed from the CSR and a simply enquiry to their immediate neighbour at 495 Childers Road and whose property adjoins the CSR, would have uncovered that in practical terms and for reasons of safety, he considers that as he told my wife, reversing onto the roadway so close to the CSR is entirely out of the question, and as a result, the said gentleman has resigned himself to only ever being able to turn left when he exits his driveway onto Stanley Road, and to never do so when traffic volumes are high.

A practical outcome of his common sense risk mitigation is that whenever he needs to visit the Elgin shopping area, he has to exit left onto Stanley Road and then turn left again into School Road. Then after turning left into Foster Street, he eventually arrives at a point on Childers Road that is a little west of the point where the eastern end of Centennial Crescent intersects Childers Road.

The normal traffic density of west bound traffic on the other side of Childers Road necessitates another left turn which then finds him heading east back past his home towards town. This allows him to do a 180 at the CSR so he can finally head safely towards his Elgin destination.

And as already indicated, from experience he knows better than to attempt to leave home when traffic flows are heavy.

### **Exiting 99A**

When I and/or our immediate neighbours on our side of Childers Road attempt to venture onto Childers Road at or near peak traffic flows, we find ourselves invariably dependent on the willingness and goodwill of east bound motorists to stop and allow us to manoeuvre our vehicles into the line of traffic that is heading towards town. A right hand turn under these circumstances is not just impractical, it is simply impossible.

By analogy, it follows that the only safe and practical option for residents exiting the proposed housing development will be to drive forward (and never backwards) over the crossing and then turn left towards Gladstone Road and as far as possible, to only do so when traffic density is light. Note that they will be manoeuvring 20m closer to the CSR than is our driveway on 507A Childers Road.

The circumstances however are not entirely identical because even when traffic is light to moderate, a vehicle attempting to leave 99A can still expect to experience delay, despite confining the attempt to a left turn only. This is because drivers exiting the nearby CSR will be reluctant to stop to allow any vehicles ahead of them into the line of traffic because they will be concerned about the risk of being hit from behind.

When passing traffic is heavy and movement is close to a standstill, there will still be delay but we can expect drivers exiting the CSR to be more willing to stop and extend a courtesy because the slower rate of movement will go some way to mitigating the risk of being hit from the rear.

Because there are to be 8 families and up to 10 vehicles onsite at 99A, some variation of the difficulties and contingencies above can be expected to occur multiple times every day.

The possibility of being hit from the rear certainly occupies my mind and that of my wife when we return from town, transit through the CSR and then attempt to turn right into our driveway at 507A Childers Road: and this despite knowing that the oncoming traffic has a clear view of the roadway ahead and can stop without the same level of risk of being rear ended that drivers will be subjected to when deciding whether to pause for a vehicle that is attempting to leave 99A. Nevertheless, I always swing wide when exiting the CSR and pull over to the centreline as I begin signalling my wish to turn right. I then lightly pump the brake pedal to activate the brake lights.

My actions above are calculated to catch the attention of any driver that is following me and so far has prevented a collision or any attempt to impatiently overtake me as I slow down to make my turn. Despite signalling a right turn, impatient attempts to overtake my vehicle were often made before I began taking the steps I have just outlined. However, when vehicles are parked to my left, those to the rear cannot pass on the inside and I have sometimes observed traffic build up behind me all the way back to the CSR before one of the oncoming drivers becomes aware of the danger being created at the CSR and is in a position to stop and let me safely turn off the road and allow the vehicles to my rear to get underway again. To date, the generosity and situational awareness of fellow Gisborne drivers has avoided my having to drive further down the road to where the traffic thins out so I can go around the block and try again.

The relevance of the risks and issues just described has risen over the last few years because the density of passing traffic has noticeably increased.

### **Returning Home to 99A**

#### *South along Stanley Road*

If a resident of 99A Stanley Road returns home heading south along Stanley Road, his first instinct will be to pull over to the centre line and then turn to the right across the oncoming traffic so he can reach his destination via the single lane JOAL that is to be provided.

On most occasions, the returnee will have to delay his right turn until a suitable gap appears in the oncoming traffic as it exits the CSR, and the delay will be greater if the traffic has come to a virtual standstill.

Even when traffic density is light, the turn will still be accompanied by some degree of trepidation because despite having been partially unsighted by the single storey flat on the corner at 495 Childers Road, not all drivers depart Childers Road and traverse the moderate curve into Stanley Road at speeds that are prudent.

As already indicated, opportunities for the returnee to execute a right turn onto the JOAL will vary in proportion to traffic flow and driver behaviour. The likelihood of any oncoming drivers allowing the returnee to cross in front of them, will depend on how the latter perceives their risk at the time of being conclusively rear ended by a following vehicle.



More specifically, the driver of an oncoming vehicle that has just exited the CSR, will have had very little time to evaluate the circumstances of the returnee's vehicle as it waits to turn across his path, but he will be aware that his own vehicle is less than 20-30m from the CSR. Under such circumstances, extending a courtesy to the returnee will generally be a risk he doesn't need and ought not to take.

More often than not, the returnee's right hand turn will be further complicated by presence of one or more vehicles parked to his left given that we can expect the residents or visitors to 99A Stanley Road to regularly make use of the parking spaces both outside and immediately opposite the development site.

The presence of one or more vehicles parked to his left will prevent following traffic from by passing the returnee's vehicle on the inside and so traffic will back up behind him until his way is clear to drive onto 99A.

If at the same time, another resident is trying to leave 99A and thus is blocking access to the JOAL, what then? This eventuality is discussed under the subsection "*The Inadequate Crossing*" below.

If the returnee is having trouble finding a gap in the oncoming traffic so he can make his turn, these same passing vehicles will delay the exiting vehicle from carrying out a left turn to leave the property.

And in the meantime, the traffic will back up along Stanley Road until the way is clear for both drivers to proceed.

#### *North Ex the CSR*

It should not be long before most returnees become aware that when traffic is heavy, the preferred way to access 99A will be to navigate round the CSR and then travel north along Stanley Road until reaching the entrance to the JOAL, but even this method is fraught with practical dangers.

#### *Special Dangers*

As the returnee slows in preparation of making his left turn into the JOAL, he runs the risk of being hit in the rear by a following vehicle and the more so if he had just been dutifully signalling a left turn to indicate that he wished to exit the CSR. The driver following may either not notice or not realise that continuing to signal a left turn is not because the returnee's indicator has gotten stuck, but because of the returnee is actually about to slow down and make another left turn.

If access to the crossing at 99A is impeded for any reason and the opportunity to park up to 2 vehicles immediately outside the subdivision is done away with, then providing no cyclists or mobility scooters etc are present to his left, the returnee may be able to pull nearer the kerb at short notice and minimise the risk of being run into from behind but it is by no means a reliable or fail safe solution.

However, if the 2 parking spaces just referred to are retained and occupied at the time, the returnee will have difficulty getting safely clear of following traffic if he has to wait for cyclists, pedestrians, mobility scooters etc to clear both the footpath and the crossing so he can safely drive onto the JOAL. And due to the lack of road width, any following vehicles will also have difficulty or be unable to drive around the returnee's vehicle on the outside and thus keep the traffic flowing away from the CSR.

As has already been pointed out, the risk of a nose-tail accident is compounded by the presence of the house at 495 Childers Road which prevents drivers from seeing round the corner when turning into Stanley Road from Childers Road. Additionally, the close proximity to the CSR will leave them little time to react and nor will they be expecting the driver in front to leave his vehicle "out to dry" so to speak, so close to the CSR.

#### *The Inadequate Crossing*

Given the maximum number of permanent residents and vehicles that are to be permitted onsite, (8 families and 10 vehicles) it is a given that from time to time, returnees will encounter a vehicle that is attempting to leave 99A Stanley Road just as they are arriving. The Applicant acknowledges the probability is real, and that such events will be ongoing by stating the following in respect to pedestrians on P. 41:

*“It is considered that the 3m separation distance will still provide sufficient refuge for between each to the site should there be two vehicles using the crossings at the same time.”*

The latest iteration of the proposed JOAL provides an entrance way and crossing that is 5.5m wide but extending back onsite to a depth of only 4.3m. Thereafter it quickly tapers back to the width of the rest of the JOAL: i.e., 4m, but as discussed next, in practical terms, it doesn't alleviate the dangers that attend two vehicles attempting to use the crossing at the same time.

While the increased width at the entrance to the JOAL may technically be wide enough for two vehicles of average width to pass under normal circumstances, this will only be possible if the driver wishing to leave the site has pre-positioned his vehicle hard to the left hand side of the JOAL. At the same time, the returnee's vehicle will need to be brought to an abrupt halt at the last minute so to speak, because the wider portion of the JOAL only extends 4.3m onto the property. In the circumstances, both drivers will need adequate warning if the manoeuvre is to be carried out under pressure without the returnee's vehicle colliding with the exiting vehicle or passersby etc. Such ideal circumstances will be unlikely to attend any of the scenarios that are likely to arise and which are detailed next, and also further below under the subsection *“Two or Three at a Time”*.

The widened portion of the JOAL is not in fact deep enough to allow the majority of family class vehicles to reliably and safely get well clear off the road and especially by way of a last minute manoeuvre, while at the same time avoiding a collision with passing cyclists, pedestrians, mobility scooters etc, or internal fencing, the nearest residence which is less than 2m away and/or any unfortunate residents who perchance are walking or standing near the end of the unprotected internal footpath that runs immediately beside and along the length of the JOAL.

[The average midsized car](#) is around 4.9m in length and a larger pickup truck may measure a little over 6m from bumper to bumper. Thus when two vehicles try to use the crossing at the same time, we should not assume that it will be possible for either style of vehicle to pull well clear of the footpath and in the case of a longer vehicle, to fully clear the shared cycle lane and roadway before coming to an immediate stop, more especially when the manoeuvre is attempted under stress.

Because the entrance to the JOAL is in such close proximity to the CSR, the returnee will have very little time to assess and react to the unexpected, especially when at the last minute, he finds his way blocked by another vehicle that is attempting to leave 99A via the same crossing

If as will mostly likely be the case, the returnee arrive home to find that the exiting vehicle is actually straddling the entranceway and not in the optimum position which from the returnee's perspective will be to the far right of the crossing, then the returnee's vehicle will have no clear onsite space of sufficient depth in which to quickly pull clear of the traffic as it exits the CSR, and even if the driver of any following vehicle reacts in time to avoid a nose-tail collision, should the latter be further delayed, then the vehicles to his rear will back up around the CSR and block it.

Unfortunately it is likely that to the degree that the returnee's vehicle is obstructing the traffic, the vehicle or vehicles attempting to leave 99A will be correspondingly impeded from leaving the site.

Regardless of whatever onsite traffic rules are in place and who may technically have the right of way at the entrance to the property, until the crossing and the end of the JOAL is cleared, the effect will be the same: the returnee's vehicle will block the traffic on Stanley Road and be unable to reach safety, irrespective of the direction from which he approached the crossing. And the longer it takes to clear the crossing, the more the traffic will back up.

#### *Two or Three at a Time*

As just discussed, the presence of a vehicle that is attempting to leave the site just as the returnee arrives, will block and prevent the latter from driving freely and safely over the crossing and onto the JOAL.

The difficulties in respect to access will be amplified further if a second vehicle is simultaneously attempting to leave the property. This is a possibility that needs to be factored into any risk assessment because the

housing proposal facilitates such an outcome by making it possible for 6 other families and 8 additional vehicles to be onsite at such a time.

Most often, the safest options for the vehicle or vehicles obstructing the JOAL will be to hurriedly reverse back where they came from or divert into the parking area of an adjacent dwellings, if available. This may well be problematic because the width of the driveway will not allow two vehicles to pass by each other and the rearmost driver will need to create sufficient space for the vehicle in front to retreat far enough along the JOAL to allow the returnee's vehicle to get clear of the passing traffic.

Accomplishing such reversing manoeuvres under pressure will likely be an interesting but worrisome spectacle if my past observations are any indication, coming as they do after years of living at the end of a long, albeit dead straight driveway.

Because there are to be 8 families and up to 10 vehicles onsite at 99A, some variation of the difficulties and contingencies above can be expected to occur multiple times every day.

Cumulatively, these additional challenges will result in misunderstanding, finger pointing, anger and the rapid disappearance of normal driver to driver courtesy, eventually translating into non cooperation between residents. If this results in any unwillingness to let other or any particular driver on or off the property, it will further endanger not only resident's lives, but also the lives of passing motorists.

### **Other Stakeholders**

*Pedestrians, skateboarders, mobility scooters, mail delivery*

High school students make heavy use of the footpath that runs past the proposed subdivision as they walk to or from school but under normal circumstances, pedestrians and other footpath users will not be at any particular risk as they pass by the subdivision. However, they will not be anticipating a sudden emergency to arise such as envisioned above, and if they are unable to jump or in the case of a mobility scooter, to accelerate quickly enough to clear the danger zone in time, the unfortunate party or parties will likely suffer the consequences of being in the wrong place at the wrong time.

*Cyclists and mobility scooters, rubbish and recycling removal vehicles etc*

The risks to cyclists and mobility scooters that are on the road as they traverse the length of the entrance to 99A will be similar to that of pedestrians. However, the driver of a vehicle that exits the CSR and then finds that the entrance to 99A is impeded, will have to take immediate action to avoid being hit from behind and in so doing, will run the risk for example, of cutting off an adjacent cyclist etc who having just negotiated a tight passage around the CSR, will naturally be found hugging the kerb or if permitted, any vehicle parked to his left. If a collision occurs, the contest will be an unfair one and the unprotected road user will likely suffer significant injuries.

### *Children Onsite*

All of the proposed dwellings occupy so much of the area of the sites they are to be built on that in its totality, most of what remains has had to be reserved for vehicle parking, the JOAL and an unfenced, unprotected, 1.2m wide pedestrian footpath that runs the length of the JOAL. So it is no exaggeration to state that in practical terms, as soon as a resident steps from their apartment, they will find themselves on or immediately adjacent to a hard surface reserved for vehicle movement or parking.

For toddlers and preschoolers in particular, this presents a very real danger. No matter how caring and capable a mother or caregiver may be, there will always be moments when his or her attention is distracted, whether by a phone ringing, a pot boiling over, another child needing attention, the arrival of a visitor etc. If such a distraction happens when a door has been left open that allows a child to venture outdoors, or when those involved are already outdoors, it will only take a few steps before the child arrives on an area reserved for vehicles. A few more steps and they will be on the street and exposed to all the attendant dangers presented by the passing traffic.

Vehicles turning into or leaving any of the provided parking areas will sooner or later encounter a situation where the driver of the turning vehicle fails to notice that a child has stepped out past the corner of a nearby building to a position where they cannot be seen because they are so close by or so short in stature that they don't reach the height of any of the vehicles windows or appear above the bonnet etc. The risk will be

highest every time the driver needs to reverse and change direction so they can leave the property via the JOAL. They may have no indication that a nearby child has been hit or run over unless the child cries out in distress. The injuries are likely to be serious or even fatal.

Drivers of vehicles travelling along the JOAL will not be unsighted by the close proximity of the dwellings to the same degree as when they turn into or leave a parking space. At such times, the nearest building will be little more than an arms length away. However, because the homes are to be built some 2m away from the JOAL and the fact that pedestrians on the pathway adjacent to the JOAL are unprotected, means that the risk of hitting a child will still remain, especially if the driver has to reverse direction for any reason.

Internal fencing could be arranged to migrate the dangers, but parking areas will need to be gated off and gates can be left open due to forgetfulness, or if they perceived to be an annoyance or inconvenience or when the weather is poor.

Swimming pools are required to have adequate fencing to prevent children from drowning but it seems when it comes to child safety, a driveway gets a free pass when it is built in the closest proximity to the homes it is intended to service and when as many as 8 families and a minimum of 10 vehicles will be using it.

These are particularly serious issues and should not be ignored because with more considerate planning, they can be remedied.

### **Other Considerations**

The risks discussed above were safely negotiated in the past because only one family and their visitors used the crossing at 99A and they had access to both generous off street parking and also an elongated strip beside the entrance and driveway onto which they could readily and quickly reverse if they needed to get clear of the crossing in a hurry.

These arrangements were sufficient for their needs and they were aware of the dangers. However, the same cannot be assumed when the occupants of 8 (or even just 5) dwellings along with their visitors can only make use of the limited means of egress that the Applicant proposes.

Accidents are never planned, but the Application unfortunately presents a plan where the risk of potentially serious accidents is already built in.

## **Housing Density**

### **Site Area**

As stated in the Councils Notified Decision Report of 29.05.2, P.18, the Applicant intends to divide the proposed 1590m<sup>2</sup> building site into 8 separate fee simple lots which after discounting the JOAL (309.5m) and footpath etc, will result in the average area of each lot amounting to only 128.3m<sup>2</sup>.

The neighbourhood round about the development site however is a good example of the variety of construction styles that were encouraged by the once common New Zealand quarter acre section (1011m<sup>2</sup>) where just one single dwelling was built on each site. Notwithstanding the infill housing of later years, site areas of 128m<sup>2</sup> or any that approach this truncated size are not to be found in the nearby neighbourhood or as far afield as several blocks away regardless of whether they support standalone or some combination of conjoined dwellings.

The proposed site areas are incompatible with the intended neighbourhood.

### **Site Coverage**

The Applicant argues (P.38 and P.39) that because the development as a whole does not exceed the maximum site coverage permissible under the District Plan, the excessive site coverage disclosed in respect to Lot's 7 and 8 should be overlooked.

However, the Councils Report (P.21) indicates that the Applicant significantly erred to the low side when calculating the site coverage with the result that only the front site (Lot No 1) complies with the maximum site coverage permitted under the TRMP and further, that in reality the actual overall average coverage of 38.3% is actually excessive and non compliant.

If the development proceeds as proposed and a future purchaser of any or all of Lots 2-8 enquires to the Council to find out if any issues of non compliance exist, what will the Council response be? If the breach is excused or overlooked, it begs the question whether such standards apply to most but not all property owners, and in the face of such precedents, will past vendors who have been forced to retrospectively bring their property up to standard to complete a sale, have the right to feel aggrieved and unfairly treated?

The existing dwelling on the development site dates from the mid 70's and is a spacious, well built, single storey construction with generous yard space, much of it in lawn. With only three exceptions, all the other residential dwellings in the area are single storey homes with significantly greater yard space than the Applicant intends to provide for any of the dwellings that make up the proposed housing development.

Each of the three exceptions however offer at least one grassed recreational area that is adequate for the purpose and the yard space of two in particular generously provide for comfortable and pleasant urban living.

By any local or out of town yardstick, the Applicant intends to build what is an extremely dense style of housing that will be quite foreign to not just nearby neighbourhoods but to nearly all the rest of the city.

But by Gisborne standards in particular, the housing density well exceeds what may be considered to be medium-density housing and as such is not permitted and has no place in Te Hapara or anywhere else in our city.

In short, the style of construction is radically dissimilar and has no regard to the impact it will have on the character of the residential accommodation in surrounding neighbourhoods.

The proposed housing density and site coverage's are incompatible with the intended neighbourhood.

## **Style of Construction**

The six, two storey dwellings are essentially carbon copies of each other, and the single storey duplex units may be similarly described. So rather than presenting a variety of styles that generate and excite the viewer's curiosity and interest, the architectural "sameness" of each dwelling will from the outset, be boring to look upon and make for a housing complex that is an equally uninspiring and boring place in which to live. The repetitive visual effect will be reminiscent of the forbidding rows of 18<sup>th</sup> century terraced housing in England when just two lifestyles predominated: the rich and the poor.

Rather than progressing the quality and desirability of housing stocks in Gisborne, the Applicant is to all intents and purposes, contributing to its regression.

The proposed construction style is incompatible with the intended neighbourhood.

## **Noise**

Whether owner occupiers or tenants, everyone has the right to the quiet and peaceful enjoyment of their residential property and are obligated to allow others to enjoy the same. This extends to a neighbour's right to reasonable peace, comfort and privacy and includes avoidance of shouting and yelling, loud parties and music, televisions blaring and the likes. Not only is such behaviour distressing to others nearby, but it can



take its toll on the health of the persons that are on the receiving end and suffering distress as a consequence.

Having lived in this neighbourhood for a little over 30 years, I can state that it has remained an area that has attracted occupants of good standing and conduct to that point that we have experienced almost zero issues with noisy or unruly neighbours over the period. On the rare occasion that a party has continued until late at night, the sound reflecting properties of the irregularly positioned buildings between us and the source, as well as the distance by which residences and other buildings have been set back from fence lines, and the typically generous yard space and trees and other plantings, have mitigated the effects to the point where simply closing an open window has usually enabled us to fall asleep as per normal or continue with whatever we were doing without distraction.

Having 8 families and up to 10 vehicles immediately adjacent to our property dramatically increases the likelihood and frequency of noisy disturbances happening right next door and the close proximity of the dwellings will increase the intensity of any untoward levels of noise arising from unruly or inconsiderate neighbours that from time to time, happen to be living beside us at 99A.

The proposed development presents an entirely different intensity and incompatible set of circumstances to what has existed in the past and will greatly increase not only the sound of vehicle movements, but also the general level of background noise.

The Applicant has provided no trees or soft surfaces that could help absorb noise and further, even the softest of noises will be reflected and amplified by the almost uniformly hard, mostly concrete surfaces of the JOAL, walkway, yard spaces and building exteriors which are made up of hard surfaces that will reflect noise in their own right.

While a focus on more considerate design parameters may somewhat limit the negative effects, the likelihood of significant noise related issues arising is in the first instance due to the density of the proposed housing which is excessive and unacceptable to the point that neither the tenants or the adjoining neighbourhood can reasonably expect their right or indeed their need of quiet enjoyment to be honoured or acceptably maintained.

The level of noise that can naturally be expected from the extreme concentration of dwellings is likely to give rise to background and acute levels of noise that far exceed the noise levels that have prevailed in the neighbourhood in the past and as such, the development is incompatible with the intended neighbourhood.

## **Open, Outdoor Spaces**

Because the actual Lot sizes are very small and the site coverage is excessive and non compliant, there is very little open space left over with which to satisfy the residents essential requirements for adequate open, outdoor spaces onsite. The available space is further reduced by the need to provide a vehicle driveway (JOAL), parking areas and an onsite footpath for residents, Even the JOAL has had to be restricted to a non compliant single carriageway despite the fact that it is so close to the dwellings, presents a threat to children and adults alike, and as already discussed, creates a further endangerment to residents whenever they drive onto or off the property.

The result is that the development offers little to no on or off site amenity and instead is characterised by a severe lack of attractive, inviting outdoor space in which to relax, allow children to play, pursue hobbies or enjoy the natural environment of which none is provided, (aside from some very limited tree plantings and landscaping that at best amount to tokenism). The Tui's that used to frequent the tops of the silver birch trees on 99A will have nothing to return to. Intense and uncalled for urbanization will have destroyed a little more of what still remains of their natural habitat.

The outdoor yard space that is provided comprises mostly hard and unforgiving concrete surfaces and where on P.94 we find there are areas shaded in green, these turn out to be described as "Garden Bed with Mulch" and so won't be suitable to walk on.

As already noted, all the other residential dwellings in the area have significantly greater yard space than the Applicant intends to provide for any of the dwellings that make up the proposed housing development.

The lack of provision for open, outdoor living spaces is incompatible with the intended neighbourhood.

## **Sunshine**

The high sunshine hours which Gisborne is noted for will irradiate the open yard spaces of Lots 1-6 for but a brief period each day and only at the height of summer when the sun is to the north and able to shine down the corridor between the buildings from an elevation that prevents the nearby internal and/or external fencing from getting in the way.

Lots 7 and 8 will benefit from the sun for longer hours during the summer because the open yard spaces face north.

At such times however, the hard concrete surfaces will become unpleasantly hot and areas to avoid, radiating the heat they have absorbed well into the evening.

During the rest of the year and particularly in colder months, the nearby internal and external fencing will cast varying lengths of shadow over all the yard spaces, ensuring that during these periods, they will be cold, damp and uninviting places in which to sit or relax, and in respect to Lots 1-6, more akin to living in an alleyway.

## **Privacy**

What privacy?

Every time a resident arrives or leaves the housing complex, every time a visitor arrives or departs, and every time a parcel is delivered will potentially be under the scrutiny of the other residents and there will be no relief from this 24/7 all year round surveillance. What anyone is wearing and whether or not anyone is home will be readily known to those who want to know.

## **Summary**

By traditional Gisborne standards and expectations, the proposed site areas are tiny and the site coverage so great that little provision has or can be made for attractive, useable outdoor living space. Adult residents and children alike will be forced to live indoors or to try to relax on mostly hard, uncompromising outdoor areas measuring only a few squares metres in size that for the most part, will seldom will see the sun in any meaningful way and be places where any representation of the natural environment is all but completely lacking.

Quite inadequate provision is made for both vehicle parking and onsite vehicle movement. Driving on or off site will endanger both residents and passing vehicles alike.

Both residents and neighbours can expect to be subjected to a noise level that will be amplified by the hard surfaces that characterise the development and from time to time, the noise levels will likely become much more than just simply annoying.

The predominance of two storey construction on a relatively small site ensures that outdoor activity on the part of other residents and immediate offsite neighbours will be anything but private.

The Applicants proposals are a radical departure from the style, site area and site coverage of dwellings and outdoor spaces that typify dwellings not only in the immediate neighbourhood but well beyond as well. As such, what is proposed will lower the prevailing standard and desirability of the existing housing in the

area and heavily impact neighbourhood property values, particularly but not limited to those that border on the development site and extending to affect those that are much further away.

Packing the maximum number of paying residents into as many oblong boxes that a site will allow and doing so in complete disregard of the maximum limit specified by the TRMP, does not constitute innovation but rather it smacks of the cold hearted exploitation of those who are desperately in need of housing, and little else besides.

By virtue of its height, bulky, rectangular and unimaginative design, the subdivision will dominate and be visually incompatible with the rest of the streetscape. The subdivision will become a long term landmark and those who willingly or unwillingly facilitated its construction will not be endeared to other city residents, and nor will the development make passersby feel proud of their city or happy about where the community and its housing stocks are headed: rather the opposite in fact.

It will be a visually unforgiving, depressing and even distressing place to live and not at all the type of accommodation that people will naturally desire to be part of.

Can we expect residents to be reticent about inviting guests to their homes or disclosing where they live? If they are, how can you really blame them?

## Responsible District Planning

### Wisdom from the Past

New Zealanders can be proud that the need to provide social housing for those who cannot attain this on their own has been recognised and provided for in this country since early last century. With the government becoming deeply involved with the creation of the [State Housing](#) scheme in the 1930's, State funded social housing has made a significant and positive contribution to our national way of life.

At the link above, you will find a candid, government sponsored online exposition of its involvement in social housing that includes a history of the first precursor to Kianga Ora: namely the State Advances Corporation (SAC). The account clearly indicates that as the SAC accumulated experience in its role as the nation's housing provider of last resort, it did not take long for it to become aware that wherever higher density housing was offered, this in itself created significant risk of community and social outcomes that were highly undesirable, to the point that the government consciously made changes and refocused its housing development policy to mitigate the risk.

From the article at the government sponsored link above, we read that focus was on both "[Building community](#)" and [Building families](#), and in particular, building "happy families".

Experience had shown that cramped and restrictive conditions fostered unhappiness, insecurity and even physical and emotional abuse, so laudable efforts were made to avoid falling into these traps going forward.

*"Among the first schemes to attempt this was the Savage Crescent precinct in Palmerston North, which was influenced by the design of 'garden suburbs' in Britain and America. Constructed between 1938 and 1945, the houses on Savage Crescent were sited around a large park, where children could safely play, free from the hazards of the street. The park was also a place where, on long summer evenings, neighbours might gather for a game of cricket or hear the latest gossip, a place where local friendships might be forged and strengthened."*

The SAC was later reinvented twice to become what we now refer to as simply "Kianga Ora," and unfortunately along the way, the safeguards that were built into past government housing policy were either set aside or overlooked. But nature abhors a vacuum, and where the risks have not been addressed and successfully mitigated during or at the planning and Resource Consent stage, negative social outcomes will attend a significant number of Council approvals.

Whether or not it is now socially or politically acceptable to discuss these realities, let alone factor them into government and/or local government housing policies, it will be the other tenants and the people residing in homes nearby that will bear the cost of officialdoms failure to recognise and apply the lessons from the past.

## Predictable Consequences

Adjoining property owners and residents do indeed have cause for concern.

*....a lawyer dealing with victims whose lives have been turned into "living hell" by their state housing neighbours is calling for the Government to offer a redress package to compensate people and ensure they are safe.*

*Litigation expert Adina Thorn says she's been inundated with victims' horror stories and says the Government has a duty to act.*

*A Herald investigation has revealed dozens of cases where tenants or private homeowners say they've suffered prolonged harassment and abuse from Kāinga Ora clients.*

*The victims claim to have fielded death threats and obscenities, been exposed to street brawls, property damage, loud music, dumped rubbish, foul language and intimidatory behaviour, often involving gang members.*

*Driven to breaking point, some have [sold their properties](#) to escape the harassment and others have gone to court [seeking restraining orders](#) to protect their families.*

*[Kāinga Ora boss Andrew McKenzie doubles down on no evictions policy](#)*

For many other current instances of antisocial behaviour associated with medium to high density social housing, see Appendix I.

Consistent with the above examples, it is important to note that a recent publication by "The Bureau of Justice Statistics" in the United States, strongly suggests that when social behaviour deteriorates, it will do so primarily in urban areas, while less populated suburban and rural areas will remain largely unaffected.

*Confirming widespread perceptions, the nation's largest crime survey finds that violent crime in urban areas rose dramatically from 2020 to 2021. The Bureau of Justice Statistics (BJS), the statistical arm of the Department of Justice, recently [released](#) findings from the 2021 National Crime Victimization Survey. According to the NCVS, which dates to the Nixon administration, the rate of violent crime rose only in urban areas. It did not change to a statistically significant degree in suburban or rural areas.*

*[Criminal Neglect - Jeffrey H. Anderson](#)*

*President of the American Main Street Initiative and served as director of the Bureau of Justice Statistics at the U.S. Department of Justice from 2017 to 2021.*

## Adjoining Residents and Property Owners

It should therefore be no surprise that when a high density housing development is forced upon adjoining home owners, it is not only likely to be unwelcome, but even more so when the consultation process with those to be most affected is either weak or nonexistent.

*The development on Bonair Crescent in the northern suburb of Millwater [has been controversial since the beginning](#), with the state landlord earlier apologising for "missing a step" and not opening the project for community consultation.*

*The development was initially the construction of two-storey townhouses on Millwater Street and would add 37 two-bedroom units to the social housing list.*

*However, after complaints and a petition from the community against the social housing development, Kāinga Ora [paused the construction before it even started](#).....*

*Selling the land makes the best economic sense in the current environment.*

*[Kāinga Ora cans controversial social housing development, saying it is not financially viable](#)*

Furthermore, it is unreasonable to expect other property owners to bear the social and other costs that arise from a failure of City Planners to anticipate need and set aside and dedicate land that is less impactful and more suited for the purpose. That after all, is a core responsibility and primary reason why such a role exists.

And addressing the failure to anticipate and plan accordingly by simply rezoning areas to a lower, less desirable standard, will impact property values and eventually affect whole neighbourhoods. Over time, a city's quality of housing will be reduced to the lowest common denominator.

## **Adding Avoidable Risks**

The new generation of social housing that has recently appeared in Gisborne is characterised by a much higher density than we have accepted in the past.

Building pockets of dense social housing on busy thoroughfares in proximity to what the government once termed “*the hazards of the street*”, such as we have allowed on Roebuck Road and Stout Street, and are now entertaining in respect to Stanley Road, sets aside the strong, existing evidence that such locations encourage, and may in fact foster higher crime rates in the city. This ought to be self-evident given that high density housing with little to no onsite open areas for outdoor recreation or relaxation, and increases the number of residents who at any given time will be found on nearby footpaths, which in turn increases the supply of potential targets for crime.

*The evidence base overwhelmingly suggests that street layouts that allow vehicles and pedestrians to move easily through a neighborhood are associated with higher crime.*

*[Impact of Housing Design on Crime - Michelle Rogerson and Rachel Armitage](#)*

*We also found that physical density, social density, and transit connectedness had significant negative impacts on cohesion, though this association is largely driven by the very dense neighborhoods in cities.*

*[Rethinking walkability: Exploring the relationship between urban form and neighborhood social cohesion - Andrew Sonta and Xiaofan Jiang](#)*

And despite the lessons of the past and the body of overseas research that shows that this type of housing leads to higher rates of crime in the community. It is nonetheless being pursued to a degree in this city as though the downside risk was nonexistent.

## **Making it Still Worse**

A “No Evictions” Policy

*The government denies having a hard-line 'no evictions' policy despite not evicting anyone in the past three years or clarifying what sort of behaviour would trigger such a measure.*

*Its 'sustaining tenancies' policy, introduced by National in April 2017, is intended to avoid state housing tenants becoming more vulnerable through homelessness.*

*[Kāinga Ora policy costs thousands in compensation to neighbours abused by unruly tenants](#)*

Early in the 1970's, the writer worked two years at the Gisborne branch of the then State Advances Corporation (an earlier iteration of Kainga Ora). Amongst my duties was the management and collection of



Gisborne's State Housing rental arrears. Although it was informal, a "no evictions" policy was firmly in place in the 1970's and will not change any time soon because as the nations accommodation provider of last resort, evicting tenants who deserve such, is perceived to be potentially very costly for any government at the ballot box.

Evictions would also provide an ongoing trove of ammunition to fire off at the party in control of the levers of power and at the same time it will saddle the latter with the need to engage in endless explaining and justification.

So unofficially and in my view, the Government's alleged "no evictions policy" is likely to be real and if so, it is certainly very long standing. We can therefore expect the denial to continue, as well as the complaints and the failure to adequately respond to legitimate complaints by those on the receiving end of what the record shows may include quite horrific behaviour on the part of Kianga Ora tenants and not just theirs of course, but also those of any landlord who packs his or her tenants into undersized accommodation with little regard for their need of outdoor space in which to relax, get some fresh air, sunshine, pursue hobbies (e.g., gardening) in a natural environment that is safe and free from prying eyes. These are the needs of normal, healthy human beings that must be provided by any landlord if their tenants are in fact to remain "normal".

## **The Research is Conclusive**

By ignoring the accumulated body of research that supports not only our government's early recognition of the need to provide adequate outdoor space for their tenants, and the steps that it took to avoid what they knew to be all too predictable outcomes, we are repeating the mistakes of the past, but this time in spades.

*The study found higher rates of all types of violent crime in areas of high-density residential land use, even after controlling for overall population. The correlation was more pronounced in disadvantaged areas but held true in other areas as well.*

*"There seems to be something about (high-density residential) units that is associated with all types of serious violent crime, even controlling for the other factors in the model," the authors write. "Apparently, high-density housing units promote serious violent crime."*

*Generally speaking, the study found higher rates of robbery, aggravated assault and rape in commercial areas, and higher rates of all violent crimes in areas traversed by major streets. It found generally lower violent crime rates in areas with parks, cemeteries and schools.*

**[SPEA study shows links between land use and violent crime rates](#)**

And instructively, there have also been unusual cases where when public housing was demolished, "crime rates fell substantially".

*Modeling the complex relationship between voucher holder locations and crime, using quarterly data, our analysis found that crime rates fell substantially in neighborhoods with public housing demolition, whereas destination neighborhoods experienced a much lesser effect than popular accounts imply. Nevertheless, on average, negative effects emerge for some neighborhoods with modest or high densities of relocated households compared with conditions in areas without relocated households.*

**[Public Housing Transformation and Crime Making the Case for Responsible Relocation - Susan J. Popkin et al](#)**

A number of other relevant and important case studies have been highlighted under Appendix II.

## **Questions to Consider**

When reading the Councils Notified Decision Report on the proposed development at 99A Stanley Road, I found that the many considerations taken into account were not only admirable, but also as comprehensive

as they were relevant. However, most notably absent and troubling, was the lack of any requirement to take into account (and mitigate) the potential for the known and undesirable social outcomes to occur that have become associated with high density social housing.

No consideration seems to be given to the body of evidence that demonstrates increasing density has a proportionately negative effect on the behaviour of the occupants. It appears that central government legislation and regulations do not require Town Planners to address these factors despite the body of research and past experience that establishes the connections. Not only is this remiss and short-sighted but not allowing it to be considered, borders on something more than irresponsible.

By ignoring the research as well as the home grown lessons from the past, and failing to mitigate the risks, we risk incurring the highly negative outcomes that they predict and then in shock and surprise, leaving the festering problems for our children and future generation to deal with, all the while hoping that it doesn't spill over into "my backyard" or involve "my" family and loved ones.

Fortunately, our city fathers had the wisdom to construct the densest social housing of their day in areas that were removed from the main traffic routes: Cambridge Terrace, Ranfurly Road, Titoki Street and Centennial Crescent are a few examples of their foresight which has been to the benefit of both the tenants and adjoining neighbours alike. However in terms of density, these areas don't begin to compare with the density of the social housing that seemingly oblivious to the risks, is being blindly approved and constructed across the city today.

## Need for New Accommodation

### Population Growth

The present need for homeless residents to be accommodated in local motels would seem to be an indication that the shortage of house in Gisborne is exceptional and that affordability may also be an issue. Presumably as a consequence of this need, we read in the New Zealand Herald that:

*"Gisborne is the only region that has recorded a consistent annual increase in the number of homes consented since the year ended October 2023," Stats NZ construction and property statistics manager Michael Heslop said.*

*There were 196 new homes consented in the Gisborne region in the year ended February 2024, up 27 per cent from the year ended February 2023.*

*"This increase was mainly driven by the rise in multi-unit homes consented," Heslop said.*

*The rise in consents in the Gisborne region included 111 multi-unit homes (up 39 per cent) and 85 standalone homes (up 15 per cent).*

**[Property boom: Gisborne region soars in home consents and sales](#)**

But there are persuasive grounds upon which to question whether:

1. the population growth and housing need is so high that it needs to be met by record levels of high density social housing,
2. multi-unit, multi storey housing is the best or only solution,
3. the locations where this use is currently permitted offer the best outcomes for the city,
4. the upward population trend is transitory (as it has been in the past) or the beginning of a longer term phenomenon.

And the questions arise because Gisborne regions population has only varied by a very small percentage since the 1970's.

[In 1975](#), the Gisborne city population was 44197.

Forty years later in 2015, it had only risen to 45374.

By 2023, it had crept up to 51135, but only at a rate that for the first time in recent decades, was in touch with (but did not lead) the upper half of growth rates experienced by the rest of the nation.

So the obvious question that arises is whether we are now so pressed for accommodation that we need to build social housing at a level that leads the nation by a wide margin and also to seriously ask why so little regard has been given to the downside effects on adjoining neighbours and the community as a whole.

With the dramatic increase in construction of multi unit social housing accommodation, the city is on the cusp of significant change that if pursued, will soon impact the nature of its housing stocks to a significant and economically irreversible manner. The density of the new social housing is quite foreign to Gisborne and eventually will affect the desirability of the city as a place to live.

## **Over-reaction or Something Else?**

A search of the Councils website for the phrase “housing crisis” returned no relevant hits at all and neither did a simple search for the keyword “housing.” At the same time, government population statistics do not demonstrate an excessive, local population growth so in the absence of hard evidence, it cannot be assumed that there is acute housing shortage in Gisborne, and least of all one that justifies leading the national statistics for new social housing by a wide margin.

According to the Councils Notified Decision Report P.16, the consent process is required to consider whether *“the development is designed with regard to the character of the area,”* yet we are witnessing a much higher approval rate of local consents for a new style of dense social housing across the city that at very least is visually incompatible and out of place with the general style of the surrounding homes.

Why then the sudden rush to approve a form of housing that the district has not seen since midway through last century, albeit then in a much less concentrated form? Is the disproportionate approval rate an overreaction on the part of Council or evidence of something else?

In the late 1990's Auckland, Christchurch and Waitakere City Councils were selected as case studies to gauge the effects of suburban housing intensification upon “amenity values.”

*Auckland, Christchurch and Waitakere City Councils were chosen as case study councils for the investigation and separate background reports were prepared on how each council is managing suburban amenity values in its city. Relevant information has been drawn together in a synthesis report and in the formulation of good practice guidelines for the management of suburban amenity values.*

### **The Management Of Suburban Amenity Values**

The report states that the Resource Management Act 1991 defines “amenity values” as:

*“those natural or physical qualities and characteristics of an area that contribute to people’s appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes”*

Has our city had the misfortune to be selected for a case study by which to gauge public reaction to urban intensification in rural population centres because it is out of the way, and mistakes made here are less likely to impact Election Day results across the rest of the country?

## **Public Consultation**

I understand that the City Council currently notifies its citizenry (a little over 50,000 in number), of Resource Consents that fall outside the permissions in the District Plan by:

1. Placing an advertisement in the Public Notices section of the Gisborne Herald and,

2. Writing a personally addressed letter to the occupants of the adjacent properties.

No use of social or other more recent forms of media appears to have been used for the purpose.

In September 2023, an independent review by Roy Morgan, “*Australia’s best known and longest established market research company*” reported that despite the Gisborne Herald being one of the few New Zealand “[newspapers to increase their total cross-platform audiences during 2022-23](#)”, the 1.4% increase still left its weekly print and online readership at just 71,000: i.e., about 10,000 readers per day.

Using the online SEO tool [Ubersuggest](#), it is possible to obtain externally derived data on how many visits have been made to the relevant pages of the Council website: i.e., pages from which interested parties can gain information about the [Tairāwhiti Resource Management Plan](#) and [review thereof](#), the [Resource Consent process](#), and also to download actual [Notified Consents](#). From this information, one can gain some understanding of how adequate or otherwise, the Councils attempts to notify and engage with the public have been.

In all the cases above, the estimated total month page visits have varied between 1 and 0 and as such are minuscule and probably much less than the margin of error.

From these statistics, the notification process appears to be non functional and however well meaning, the Councils efforts to inform and notify, let alone engage with the public appears to be inadequate and low on its list of priorities, given that:

1. It will be monitoring the performance of its own website and have real time access to much more refined statistics and,
2. It has the postal addresses of not just the adjoining neighbours of each notifiable development, but also all the rate paying public in the district (16,500 occupied dwellings in 2018), yet it does not make use of any of the rest of them as part of the notification process.

Under these circumstances, the Council is at particular risk of acting in a vacuum that all but ensures it is insulated from the wishes of the people whose interests it represents and the public expects to protect from the pressure exerted by developers and central government.

No doubt it will always be challenging to engage in a meaningful way with a public that necessarily is preoccupied with attending to the needs of daily living and especially if no education program has been undertaken to make them aware of how specific major issues will affect them personally. Nevertheless, it is difficult to conceive how the Council can approve significant departures from the TRMP and at the same time, be confident that it has a mandate from the people for doing so.

## Accountability

Anecdotal though it is, I have yet to encounter anyone local who is in favour of the style and placement of new social housing developments appearing across the City. All have been concerned and some are downright hostile to what is happening, but most are resigned to the conclusion that there is no point opposing the plans because dissenting voices are never listened to and City Hall always ends up doing what it wants to do. Are they justified for holding this opinion?

The Councils own logo speaks of what Gisborne’s traditional community values and expectations have always been centred around: a pleasant, laid back and desirable rural city that offers a lifestyle characterised by sun, surf and the freedom of outdoor living. This is diametrically opposed to the social housing that the Council is currently delivering to its ratepayers and other residents.

The construction of the three storied, visually impactful ‘monstrosity’ on Roebuck Road is glaring testimony (and will be for decades to come) that the present administrators of the TRM Plan have been enveloped by a regulatory complexity that is not of their own making, but within which the interests of local townspeople

has been lost sight of and cannot be a priority. The edicts and rules of Central Government appear to have prevailed over the wishes of the citizens they serve.

At very least, the recent changes are such a departure from past forms of local housing construction, that the Council needs to invite the people of Gisborne to participate in a professional, well advertised poll of sufficient coverage, to find out they think about the current changes and what if anything should be done differently to meet the City's current and future housing needs. The questions will need to be unbiased and neutral in nature,

To its credit, the Council has more recently invited the public to offer their initial opinions on what fertile, pioneering minds have created to discourage all motorists from using southern Grey Street. I consider the result to be a labyrinth and obstacle course of notable complexity but one that totally abandoned the KISS principle and completely lost sight of what roads are actually built for, or the consequences of rendering them unusable.

As reproduced below, [those comments](#) that are strongly in favour of the project have invariably been heavily down-voted while those strongly against what has been done are heavily up voted.

Will Council heed the views expressed by the majority?



## Is Change on Its Way?

In view of the financial difficulties that Kianga Ora has gotten itself into, there are indications that the government may well address the issues, at least in part, by restructuring the crown entity and enabling more local input into what happens at local level. This is certainly desirable and an area of change where I believe there is much room for improvement.



*The idea of community is pervasive in the review, but apparently Kāinga Ora doesn't do community well. For example, the review claims that "community concerns about Kāinga Ora's developments and tenancy issues are eroding their social licence".*

*A proposed response is "that government housing support should be assessed based on making evidence-based decisions at a local, community level" and that "where possible, decision-making should be devolved to local organisations that have a genuine community mandate for the task".*

[\*The Kāinga Ora review avoids the big and obvious questions\*](#)

## **507A Childers Road**

The following matters are concerns specific to the owners and residents of 507A Childers Road but do not limit or exclude their right to pursue or voice the other concerns that they have in relation to the proposed housing development at 99A Stanley Road.

### **Fencing and Privacy**

It is noted that the Application has not provided any architectural elevations of the two storied dwellings when viewed from any part of the property at 507A Childers Road. It would be appreciated if this could be remedied so a better understanding of how the upstairs windows of units 3, 4, 5 and 6 will impact privacy. Thank you.

On page 20 of the application, the following is stated:

*"The existing external boundary fence is proposed to be retained."*

On page 44, we read:

*"The external boundaries of the sites will be screened via a mix of existing fencing and screen planting that will reduce visual impacts between the site and surrounding properties."*

Page 49 states:

*"The perimeter fencing and landscaping proposed around the boundary of the site will retain privacy from ground floor indoor and outdoor living areas. Careful placement of second storey windows toward external boundaries mitigates overlooking from this higher level. The side façades of Units 2 and 6 include only a high level window in a bedroom and frosted bathroom windows so as to avoid overlooking neighbors. While a standard bedroom window is utilised on the second floor of Units 3 and 4 which have outlook toward the boundary, these dwellings are setback at least 3.8m which mitigates privacy effects towards neighbours".*

And with particular respect to 507A Childers Road, the following claim is made on page 51:

*"...potential privacy effects from the west are mitigated through the provision of the existing perimeter fencing along the boundary."*

The said "existing perimeter fencing along the boundary" with the property at 507A Childers Road comprises a substantial concrete block wall structure that is well built and in good order. The uninterrupted wall spans the full length of the common boundary. It is made up of three contiguous sections of 200mm concrete blocks where the two outer sections have been erected 8 courses high and about a central section of wall that is 14 courses high. Each section is adequately supported by a solid concrete footing.

The taller central section of the wall also serves as the external western wall of an existing double vehicle garage erected on 99A Stanley Road.

The “*existing perimeter fencing*” along the common boundary with 99A Stanley Road, does provide as the Applicant states, an important, albeit inadequate element to help mitigate “*potential privacy effects*” that result from the proposed development.

On page 43, it is further stated:

*D. Existing Buildings*

*The development will require all existing buildings to be removed from the site.*

The Consent Application provides images such as found on P.10, 11, and 72, that are intended to convey a sense of what the completed housing development will look like and contrary to what is stated on page 20 and reproduced above, it appears that the western wall of the garage is to be dismantled at least until it is below the height (1.8m) of the proposed internal, timber paling fence that will be built inside the existing boundary fencing.

In representing the owners of the property at 507A Childers Road, I wish to place on record that they as joint owners of the existing common boundary wall between 507A Childers Road and 99A Stanley Road, (See accompanying images contained with the file “Common Boundary Fence”) and without limitation to their other rights that arise from being the owners of the adjoining property, forbid and do not agree or consent to any:

1. Changes being made to the existing common boundary wall including any alteration to its present height, width, structure and material composition, and this prohibition expressly includes the central section of the wall that also serves as the western wall of the double garage erected on 99A Stanley Road,
2. Changes or any actions being undertaken by NZ Housing Group Gisborne that could harm, compromise or reduce the structural integrity and/or stability of any part of the boundary wall by any means or for any reason whatsoever.

On P.51 it is recorded that in respect to our property at 507A Childers Road,

*“...we note that the outdoor living space is orientated to the north and that potential privacy effects from the west are mitigated through the provision of the existing perimeter fencing along the boundary. As such, any adverse effects on these persons are considered to be avoided or mitigated and less than minor.”*

It appears that the statement is directionally challenged and should have read, “potential privacy effects from the east” but that aside, the Applicant claims that by having what is but a portion of our living space oriented to the north, the existing, common perimeter fence renders privacy effects “avoided or mitigated and less than minor.”

If the Applicants claim is accepted as valid, then the corollary also is true: a potential privacy effect does exist on the eastern and southern sides of our property that is caused by their proposed development and may in fact be minor or more than minor.

Residents in the two storied dwellings to be erected on Lots 3-6 will indeed be able to observe all comings and goings to our property and home, be they friends, family, courier deliveries, trades people etc or our own personal activities. Any residents (and strangers at that), who make it their business to know, will know with certainty whether anyone is home, when the front door or a car door is left open, as well as when anything of value has been left unattended outside and whenever we are on holiday and the house is unoccupied.

There will be no relief from this 24/7 all year round surveillance.

We do not assess these potential privacy effects to be minor but rather a gross intrusion on our rights to privacy and quiet enjoyment.

Should the development proceed to completion, then given the number and frequency of complaints and the accumulating track record of high density style social housing developments, (something that is easy to confirm online. See Appendix I), I am unable to come up with a single viable reason why a informed buyer would now want to purchase 507A for his or her own residential use, let alone at a price that compared to the surrounding property values that prevailed before the Applicants intentions were made public, will not result in a heavy financial loss to the owners.

## Conclusions

The subject application exceeds the maximum housing density permitted by the TRMP by SIXTY PERCENT (60%): namely 8 dwellings as opposed to the maximum permissible of 5 only. This substantial excess and non compliance raises serious questions and considerations and give rise to and are central to each and every concern I have raised.

Upon reviewing the proposed housing submission, I have come to the view that:

1. The intended housing density can only be rated as high, regardless of whichever appropriate metric is applied, and especially so when compared to the typical housing density of the surrounding neighbourhood. In terms of the relatively low historical, and currently, the modest rates of population growth, such high density housing has been unknown and neither needed nor appropriate for Gisborne City, and perhaps never will be.
2. Building just 3-5 homes on the chosen site, let alone 8, and expecting the residents to be able to safely access the street via a vehicle crossing that for practical purposes does not support use by more than one vehicle at a time, and then locating the crossing close by one of the busiest roundabouts in the city on a relatively short section of roadway that connects said roundabout to an even busier roundabout on Gladstone Road, is both ill-considered and uncalled for, given the difficulties and dangers that not just every resident driver will be exposed to, but also every passing motorists as well, whenever residents attempt to drive on or off the property.
3. The dangers for residents are exacerbated by positioning the one, single lane driveway (JOAL) so that it runs close by each of the dwellings, being only separated from 6 of the dwellings by a 1.2m wide walkway that itself offers no protection to pedestrians. There are no means for a driver to change direction other than to reverse out of their narrow parking space and onto the JOAL. This process will endanger pedestrians who unexpectedly step out, or in the case of children, may run out from the corner of a nearby building (when chasing a ball etc) at a time when the driver is unsighted. The advent of modern, silent, electric vehicles simply heightens this danger.
4. The proposed dwellings cover almost all of the site and apart from the footpath, nearly all of what ground space remains comprise hard surfaces that are for the primary use of motor vehicles or very small "green" areas that are to be mulched and therefore unsuited for residents to walk on.
5. The residents need for adequate, useable onsite outdoor space in which to relax, play with children and pursue popular hobbies such as gardening etc has not been provided for.
6. In summer, the hard surfaces will not only be visually and physically uncompromising, but on sunny days, they will exacerbate the heating effect by absorbing and continuing to radiate the sun's energy well into evening. In winter when the sun is lower in the sky, the buildings and internal fencing will ensure that outdoor living spaces adjacent to the dwellings will be cold, uninviting and damp.
7. All outdoor activities will be under the gaze/scrutiny of the other residents 24/7. Living under such scrutiny in cramped conditions will become stressful and impact the mental and emotional wellbeing of the resident's.

## Appendix II

*The results reveal that the traditional neighborhood characteristics measured in social disorganization research provide significant explanatory power for both measures of crime at the municipal level. Population density was found to have a significant negative relationship with property crime.*

[Urban sprawl, population density, and crime: Joshua R. Battin and Justin N. Crowl](#)

*Results suggest that both housing composition and density are significantly associated with residential burglary. In particular, one unit increase in Floor Space Index, an indicator of housing density and Ground Space Index, an indicator of housing composition could lead to an 11.9% and 9.1% increase in the incident rate of residential burglary.*

[Examining the effect of housing density and composition on residential burglary in Wuhan, China - Han Yue, Tao Hu & Duan Lian](#)

*A significant social determinant of health for public housing residents is community violence. Health Centers located in or immediately accessible to public housing developments are more likely to be in areas with higher rates of violent crime, defined as murder, rape, robbery, and assault 3 . In fact, there is an average of 508 violent crimes per 100,000 in counties where Public Housing Primary Care (PHPC) Health Centers are located compared to just 386 per 100,000 nationally 4 . More than half of all PHPCs are in counties with highest violent crime rates.*

[Addressing Violence In Public Housing Communities, National Center for Health in Public Housing January 2019](#)

*The extant research shows a moderately strong positive relationship between the location of public housing projects and crime hotspots in urban centers. Some studies identify a distance-decay effect whereby rates of delinquency, crime, and violence diminish with distance from the housing complex whereas other research finds crime and violence to be high but relatively contained within the project.*

[Public Housing and Crime Patterns - Griffiths, E. \(2014\)](#)

*Low-income housing may have smaller yards, which increases the number of individuals on the sidewalks and the supply of crime targets, consistent with situational crime prevention mechanisms. Low-income housing development may also reduce the overall level of target hardening of homes and personal effects, thereby increasing the ease of crime and reducing opportunity costs of offending.*

[Community Design and Crime The Impact of Housing and the Built Environment - John MacDonald](#)