

**20 September 2022**

Attn: Hutt City Council  
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*Submission by email via: [district.plan@huttcity.govt.nz](mailto:district.plan@huttcity.govt.nz)*

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON A  
NOTIFIED PROPOSAL FOR PROPOSED DISTRICT PLAN CHANGE 56  
TO THE OPERATIVE CITY DISTRICT PLAN UNDER CLAUSE 6 OF  
SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991**

**This is a submission by Kāinga Ora - Homes and Communities on Proposed District Plan Change 56 – Enabling Intensification in Residential and Commercial Areas (“PC56”) to the Operative Hutt City District Plan (“the Plan” or “District Plan”) from Hutt City Council (“the Council” or “HCC”):**

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

**The specific provisions of the proposal that this submission relates to:**

PC56 to the District Plan in its entirety.

**This document and the Appendices attached is Kainga Ora submission on PC56.**

**The Kāinga Ora submission is:**

1. Kāinga Ora Homes and Communities (“**Kāinga Ora**”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
  - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
  - b) Support good access to jobs, amenities and services; and
  - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across the Wellington region.
3. Kāinga Ora therefore has an interest in PC56 and how it:
  - a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
  - b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental and market housing; and
  - c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. The Kāinga Ora submission seeks amendments to the PC56 in the following topic areas:
  - a) **Across the Proposed Plan Change** - References to Design Guides are deleted across the plan and provisions are updated to reflect design outcomes sought, external design guides are referenced as a guidance note, or guidance is streamlined and simplified. Kāinga Ora seeks the design guides are guidance that is provided outside of the Plan and can be updated on best practice without the need to undertake a Schedule 1 of the RMA process every time it needs to be updated.

- b) **Definitions** – New definitions are sought on flooding hazards to ensure these are identified in the Plan, without being included as a Natural Hazard Overlay in the District Plan maps. Amendments are sought to the Definition of Natural Hazard overlay to address the static nature of flood mapping.
- c) **Introduction** – Amendments sought to the wording, including reference to areas where greater levels of intensification are to be enabled, and changes to guidance regarding natural hazards.
- d) **Subdivision** – Amendments sought to subdivision rules and the addition of notification preclusion statements for Restricted Discretionary Activities.
- e) **Residential Zones** – Support the proposed zoning framework comprising of a Medium Density Residential Activity Area and a High Density Residential Activity Area with amendments sought as follows:
  - i. **Medium Density Residential Activity Area (“MDRAA”)** – Refine and simplify provisions. Provide greater design flexibility to recognise the planned urban built form. This includes the development of a Height Variation Control to increase height limits to 18m (4/5 storeys) when proximate to identified centres (within a 400m/5-10 minute walkable catchment from the edge of the centres). Revisions to expand application of notification preclusion statements. Refine assessment matters within rule framework.
  - ii. **High Density Residential Activity Area (“HDRAA”)** – Refine and simplify provisions. Provide greater design flexibility to recognise the planned urban built form and expand threshold for permitted residential development. Increase enabled height limits across High Density Residential Activity Area, within a walkable catchment from the city centre, the Petone Commercial Activity Areas, Naenae and Waterloo commercial centres. Introduce flexibility to enable commercial activities at ground floor of apartment buildings through a defined consent pathway. Revisions to expand application of notification preclusion statements. Refine assessment matters within rule framework.
  - iii. **Residential Heritage Precinct** – adjust boundary of HA-09 and amend name of Petone State Flats Area to Petone State Housing Area. Relocate

precinct provisions to a heritage based chapter. Change to an overlay (not as a precinct) and introduce a rule framework for the demolition of buildings.

f) **Commercial and Mixed Use Zones:**

- i. **Centres hierarchy** – Amendments sought to undertake a comprehensive review of the existing centres hierarchy and zoning framework to better align with national and regional direction, align the proposed centres hierarchy with the current role and future role and function of centres within the urban environment across Hutt City and the greater Wellington Region, along with general changes to better reflect the need for well-functioning urban environments.
- ii. **Enable greater level of intensification** – Changes to enable intensification to achieve the planned urban built form, including as follows:
  - a. **Support unlimited height in the City Centre Zone and Petone Commercial Activity Area 2.** Minor amendments to provisions to more clearly reflect outcomes sought.
  - b. **Petone Mixed Use Commercial Area 1** – increase height limit to 53m, in recognition that this area is the equivalent to a Metropolitan Centre Zone. Petone is identified as a locally significant centre in the Proposed Regional Policy Statement Change 1 of Greater Wellington Regional Council. Wellington City Council has proposed a Metropolitan Centre Zone. While Hutt City Council has not changed Petone to a Metropolitan Centre, Kāinga Ora seeks the Petone mixed use commercial area to be treated and recognised as a metropolitan centre to seek regional consistency.
  - c. **Naenae and Waterloo** – increase the height limit in the Suburban Mixed Use Areas of Naenae and Waterloo to 36m. Kāinga Ora recognises that the Naenae and Waterloo commercial areas are prominent commercial areas in the district and should be identified for greater height and development. Kāinga Ora also seeks the expansion of the Suburban Mixed Use Area Zone to cover the most of the Naenae commercial area. This change emphasises the role and function of the Naenae commercial centre in the district and wider urban environment. Kāinga Ora considers

Naenae and Waterloo to be town centres in the context of the Hutt City district and greater Wellington region.

- d. **Suburban Mixed Use Activity Area (“SMUAA”)** – support height limit of 22m where proposed in PC56, and seek application of a broader 22m height limit across all centres (and zoning) across the Hutt City. Kāinga Ora considers that there are a number of commercial centres in Hutt City that are equivalent to a Local Centre Zone in context of the district and greater Wellington region. Kāinga Ora seeks amendments to enable a range of residential activities in this zone and the assessment matters within the rule framework.
- g) **Natural Hazards** – Support risk-based management framework and associated application of activity status for identified hazards. Amendments sought to remove reference to static overlay maps.
- h) **Wind** – Amendments sought to revise the height limit at which the rules are triggered and to provide for any non-compliance as a restricted discretionary activity.
- i) **Changes to the Planning maps** – Kāinga Ora seeks amendments to the planning maps to reflect the amendments sought to the commercial centres, centres hierarchy, and increased intensification of the HDRAA and MDRAA to better achieve well-functioning urban environments and national and regional consistency. The key changes sought are outlined in **Appendix 2** and as follows:
  - i. Expand the HDRAA to apply to areas that are generally:
    - a. 15min/1200m walkable catchment from the edge of the city centre – with increased heights of 43m (12 storeys) within a 400m/5-10min walkable catchment, 29m (eight storeys) within 800m/10min walkable catchment of the city centre, demonstrated with a Height Variation Control overlay;
    - b. 10min/800m walkable catchment from the edge of Petone Mixed Commercial Activity Areas – with increased heights of 36m (10 storeys) within 400m/5-10min walkable catchment of the Petone commercial centre, demonstrated with a Height Variation Control overlay;
    - c. 10min/800m walkable catchment from rapid transit stops; and

- d. 10min/800m walkable catchment around the Suburban Mixed Use Activity Areas in Waterloo and Naenae – with increased heights of 29m (eight storeys), within 400m/5-10min walkable catchment of these centres, demonstrated with a Height Variation Control.
  - ii. Rezone the residential areas surrounding the centres of Eastbourne, Stokes Valley, and Wainuiomata to MDRAA, and apply a Height Variation Control of 18m height limit over the residential areas within a 5-10min/400m walkable catchment of these centres.
  - iii. Apply the introduced Height Variation Control over residential areas within 400m of other identified centres, where Kāinga Ora considers them to be the equivalent of a Local Centre in the context of the wider district and Wellington region. These are centres on Elizabeth Street, Burnside & Lockett streets, and Stelin & High streets.
  - iv. Expand the spatial extent of Naenae Suburban Mixed Use Activity Area to encompass adjacent General Business Activity Area and increase the height limits to 36m.
  - v. Increase the height limits of the Waterloo Suburban Mixed Use Activity Area to 36m.
  - vi. Remove flood hazard overlays.
- j) Any consequential changes necessary to give effect to the changes highlighted above or in the appendices attached.
5. Kāinga Ora also has an interest to ensure national and regional consistency in resource management documents across the Wellington Region. From reviewing the Wellington regional plan changes/reviews and associated s32 documentation, it has become apparent that there has been little time for Councils to align their thinking. Accordingly, Kāinga Ora submits that HCC should take the time to align PC56 with other regional planning documents ahead of the hearings for those documents.
6. Kāinga Ora seeks that the hearing process for the PC56 follows that of Plan Change 1 (PC1) to the Wellington Regional Policy Statement so that consistency can be provided across the Wellington region and RMA s73 can be met which requires district plans to “give effect” to the Regional Policy Statement. It is unclear how this has been achieved

as PC1 was notified after PPC2. Similarly, s74(2) also anticipates regional consistency including with matters such as the Regional Land Transport Plan. It is unclear how this has been achieved as PC1 was notified after the Variation and there appears to be misalignment between other plans of the region.

7. The changes sought are made to:
  - i. Ensure that Kāinga Ora can carry out its statutory obligations;
  - ii. Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991, relevant national direction and regional alignment;
  - iii. Ensure that the s32 analysis has appropriately analysed and considered other reasonable options to justify the proposed plan provisions;
  - iv. Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
  - v. Provide clarity for all plan users; and
  - vi. Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.
8. The Kāinga Ora submission points and changes sought can be found within Table 1 of **Appendix 1** which forms the bulk of the submission.
9. Mapping changes sought are included in **Appendix 2**.

**Kāinga Ora seeks the following decision from HCC:**

That the specific amendments, additions or retentions which are sought as specifically outlined in **Appendix 1-2**, are accepted and adopted into Proposed Plan Change 56, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

**Kāinga Ora wishes to be heard in support of their submission.**

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its submission on PC56 to address the matters raised in its submission.

If others make a similar submission, Kāinga Ora are happy to consider presenting a joint case at a hearing.



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## Appendix 1: Decisions sought Proposed Plan Change 56

The following table sets out the amendments sought to Proposed Plan Change 56 to the Operative Hutt City District Plan and also identifies those provisions that Kāinga Ora supports.

*Kāinga Ora* proposed changes are shown as ~~strikethrough~~ for deletion and underlined for proposed additional text.

Changes in Proposed Plan Change 56 are shown as ~~strikethrough~~ for deletion and underlined for proposed additional text.

**Table 1**

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
<b>General Submission Points</b>					
1.	All	District Plan Wide  Centres Hierarchy and scale	Support in part	Kāinga Ora generally supports the approach to implement the NPS-UD and the Housing Supply Act by incorporating intensification provisions into the District Plan. The Kāinga Ora submission as a whole seeks improvements to better align with national direction and achieve regional consistency with this direction. This includes a comprehensive review of the Centres hierarchy.	<ol style="list-style-type: none"> <li>1. Review the Centres hierarchy and commercial provisions in the Commercial and Mixed-Use zones to improve national and regional consistency to enable and support increased intensification across the District.</li> <li>2. Expand Centre Zoning and residential intensification standards to reflect an increase in intensification anticipated in and around centres and rapid transit stops.</li> <li>3. Undertake any consequential changes necessary across the District Plan to address the matters raised above.</li> </ol>
2.	All	District Plan Wide  Standards	Support in part	Kāinga Ora generally supports the use of standards to address adverse effects across the District Plan. A number of changes to the building height controls have been requested	<ol style="list-style-type: none"> <li>1. Amend standards across the plan to be proportionate to the building height changes sought in this submission.</li> </ol>

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				<p>in this submission to help ensure the NPS-UD and the Housing Supply Act are effectively and efficiently implemented. There may be a number of other consequential changes needed to standards to give effect to these height adjustments as noted in this submission such as increasing height in associated wind and daylight standards. These changes should be proportionate to the changes in building height sought to address any transition issues between zones and provide for increased levels of intensification.</p>	<p>2. Undertake any consequential changes necessary across the District Plan to address the matters raised above.</p>
3.	All	District Plan Wide  Qualifying Matters – method	Oppose	Kāinga Ora request all qualifying matters be controlled by overlays rather than precincts, with provisions contained within the District-Wide chapters of the District Plan. Qualifying matters are additional provisions that apply to	All qualifying matters and supporting overlay provisions be relocated to chapter(s) contained within District-Wide section of the District Plan.

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				<p>sites and are therefore more appropriately captured and communicated by overlays, rather than zones or precincts.</p> <p>Kāinga Ora generally supports areas with significant identified heritage values being categorised as a qualifying matter. Kāinga Ora notes that the proposed approach is to largely retain the status quo for development in these areas until such time as a future plan review where more developed provisions and controls will be introduced to protect heritage values more comprehensively.</p>	
4.	All	District Plan wide  Reference to Design Guides and design guidelines	Oppose	<p>Kāinga Ora opposes the inclusion of Design Guides or design guidelines in the Plan, which act as de facto rules to be complied with.</p> <p>Kāinga Ora opposes any policy or rule approach which would require</p>	1. Kāinga Ora seeks the Design Guides and design guidelines are removed from within the District Plan and are treated as non-statutory tool, outside of the District Plan. A note should be added where reference is made to such guidelines:

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				<p>development proposals to comply with such design guidelines in the District Plan.</p> <p>Kāinga Ora alternatively seeks and supports design guidelines sitting outside the Plan as guidance regarding best practice design outcomes. The Design Guidelines should be treated as a non-statutory tool.</p> <p>If there is content of a Design Guide or design guideline that Council wants in the Plan, Kāinga Ora seeks that these are relocated within a specific rule, matter of discretion or assessment criterion.</p> <p>Where particular design outcomes are to be achieved, these should be specified in matters of discretion or assessment.</p>	<p><i>Note:</i></p> <p><u>1. Acceptable means of compliance and best practice urban design guidance is contained within the Council's Design Guidelines.</u></p> <p>2. Delete all references to the Design Guides and design guidelines.</p> <p>3. Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment.</p> <p>4. If the Council does not provide the relief sought, in deleting the Design Guides and design guidelines and references to such guidelines in the District Plan, Kāinga Ora seeks that the design guidelines are amended, simplified and written in a manner that is easy to follow. The outcomes sought in the guidelines should read as desired requirements with</p>

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					<p>sufficient flexibility to provide for a design that fits and works on site, rather than rules that a consent holder must follow and adhere to. Otherwise, there is no flexibility and scope to create a design that fits with specific site characteristics and desired built form development. Kāinga Ora seeks the opportunity to review these guidelines if they are to remain a statutory document.</p>
<b>Chapter 1 – Introduction and scope of the plan</b>					
5.	Chapter 1 – 1.10.1A Urban Environment	Objective	Support	Kāinga Ora supports this objective, which gives effect to Objective 1 of the NPS-UD and clause 6 of schedule 3A of the Act.	<i>Retain as notified</i>
6.	Chapter 1 – 1.10.1A Urban Environment	Policy 1	Support in part	<p>Kāinga Ora generally supports this policy, which gives effect to Policy 3 of the NPS-UD.</p> <p>Amendments are sought to reflect the outcomes sought within the broader submission of Kāinga Ora.</p>	<p><i>Amendments sought</i></p> <p><b><u>Policy 1</u></b>  <u>Provide for building height and density of urban form that enables:</u>            a) <u>as much development capacity as possible within the Central Commercial Activity Area and Petone Commercial Activity Area</u>  <u>-2,</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p>b) <u>building heights of at least 6 storeys, with greater intensification enabled in identified Height Variation Control areas:</u></p> <ul style="list-style-type: none"> <li>i. <u>within the Petone Commercial Activity Area -1,</u></li> <li>ii. <u>within a walkable catchment of the Central Commercial and Petone Commercial Activity Areas,</u></li> <li>iii. <u>within a walkable catchment of rapid transit stops,</u></li> <li>iv. <u>within the suburban centres of Avalon, Eastbourne, Moera, Stokes Valley and Wainuiomata, and</u></li> <li>v. <u>Within a walkable catchment adjacent to the suburban centres of Naenae, Waterloo, -Avalon and Moera.</u></li> </ul> <p>c) <u>building heights of at least 4-5 storeys adjacent to-within a walkable catchment of the identified suburban centres, including of Eastbourne, Stokes Valley, and Wainuiomata, and</u></p> <p>d) <u>building heights of at least 3 storeys in the remainder of the urban environment, excluding Hill Residential and Landscape Protection Residential Activity Areas.</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
7.	Chapter 1 – 1.10.1A Urban Environment	Policy 2	Support	Kāinga Ora supports this policy, which gives effect to Policy 4 of the NPS-UD and section 771 of the Enabling Housing Supply Amendment Act	<i>Retain as notified</i>
8.	Chapter 1 – 1.10.1A Urban Environment	Policy 3	Support	Kāinga Ora supports this policy, which gives effect to clause 6 of schedule 3A of the Act.	<i>Retain as notified</i>
9.	Chapter 1 – 1.10.1A Urban Environment	Policy 4	Support	Kāinga Ora supports this policy, which gives effect to clause 6 of schedule 3A of the Act.	<i>Retain as notified</i>
10.	Chapter 1 – 1.10.1A Urban Environment	Explanations and Reasons	Support	Kāinga Ora generally supports the proposed guiding text within the proposed explanations and reasons.	<i>Retain as notified</i>
11.	Chapter 1 - 1.10.2 Amenity Values	Objective 1	Support	Kāinga Ora supports this objective, which gives effect to Objective 4 of the NPS-UD.	<i>Retain as notified</i>
12.	Chapter 1 - 1.10.2 Amenity Values	Objective 2	Support	Kāinga Ora supports these objectives and policies.	<i>Retain as notified</i>
13.	Chapter 1 - 1.10.2 Amenity Values	Policy	Support in part	Kāinga Ora generally supports this policy, but seeks changes to articulate the outcome more clearly.	<i>Amendments sought</i>  To identify within all activity areas the general character and amenity values <del>of</del> <a href="#">of the planned built form for</a> that activity area.



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14.	Chapter 1 -1.10.3 Residential Activity Chapter 1 -1.10.3 Residential Activity	Policy 1	Support in part	<p>Kāinga Ora generally supports this policy, which gives effect to Policy 3 of the NPS-UD and Policy 2 of schedule 3A of the Act.</p> <p>Amendments are sought to reflect the outcomes sought within the broader submission of Kāinga Ora.</p>	<p><i>Amendments sought</i></p> <p><b><u>Policy 1</u></b>  <u>Except in circumstances where a qualifying matter is relevant:</u></p> <p>a) <u>Apply the Medium Density Residential Standards across the Medium Density Residential and High Density Residential Activity Area,</u></p> <p>b) <u>For the areas of Eastbourne, Stokes Valley and Wainuiomata in the High Medium Density Residential Activity Area, enable buildings of at least four/five storeys,</u></p> <p>c) <u>In all other areas in the High Density Residential Activity Area, enable buildings of at least six storeys and between eight to twelve storeys in identified Height Variation Control areas.</u></p>
15.	Chapter 1 -1.10.3 Residential Activity	Policy 2	Support	Kāinga Ora supports this overarching policy, which seeks to manage the rate of urbanisation at the urban/rural fringe.	<i>Retain as notified</i>
16.	Chapter 1 -1.10.3 Residential Activity	Explanation	Support	Kāinga Ora generally supports the explanatory text.	<i>Retain as notified</i>

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17.	Chapter 1 -1.10.4 Commercial Activity	Policy and explanation	Support in part	<p>Kāinga Ora notes that the Council intends to undertake a comprehensive review of the Commercial Areas as part of a future District Plan review, at which point a more detailed review of the centres hierarchy will occur. While the proposed changes are considered adequate to give effect to current national direction, Kāinga Ora considers the absence of such a review through the current plan change process represents a missed opportunity and therefore more broadly seeks that such a revision is undertaken in response to submissions.</p> <p>Minor amendments sought to recognise how Suburban Mixed Use zones vary in size and are not necessarily small, but are smaller within the Lower Hutt Context.</p>	<p><i>Amendments sought:</i></p> <p>(c) Recognise the Suburban Mixed Use; <del>Suburban commercial and Special commercial</del> centres as the secondary areas in the hierarchy, being smaller scale with a limited number of activities servicing local area needs.</p>
18.	Chapter 1 - 1.10.10 Heritage	Policy (c)	Support in part	Kāinga Ora generally accepts this proposed strand to the policy, noting that the qualifying matter applies	<i>Retain as notified</i>

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				<p>only to areas identified as having significant historic heritage value.</p> <p>Notwithstanding support for this policy strand, Kāinga Ora opposes in part a number of landholdings proposed to be included in Residential Heritage Precinct HA-09 and does not support the policy applying to these landholdings, as reflected in Attachment 2.</p>	
19.	Chapter 1 – 1.10.11 Lessening Natural Hazards	Flood Hazard Overlay	Oppose	<p>Kāinga Ora opposes the inclusion of flood hazard mapping as part of the District Plan. Including Flood Hazard overlays in the District Plan ignores the dynamic nature of flood hazards and will create unnecessary additional cost and uncertainty for landowners and land developers. Kāinga Ora agrees that it is appropriate to include provisions and rules to manage the risk of flood hazards but seeks that the rules are not linked to static maps contained within the District Plan. Instead, the</p>	<p><i>Amendments sought:</i></p> <ol style="list-style-type: none"> <li>1. Remove natural hazard flooding overlay(s) from the District Plan statutory maps, and instead hold this information in non-statutory GIS maps.</li> <li>2. Creation of new definitions to identify flood hazards in the Plan.</li> <li>3. Amended rule framework to enable rules to be linked to newly defined terms of Flood Hazards.</li> </ol>

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				<p>rules can be linked to defined terms of the hazards.</p> <p>The Auckland Unitary Plan (“AUP”) adopts a set of non-statutory flood hazard overlay maps which operate as interactive maps on the Council’s ‘Geo Maps’ website – a separate mapping viewer to the statutory maps. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 process under the RMA.</p> <p>Kāinga Ora notes that there is no formal requirement for flooding overlay maps to be included within a district plan. Kāinga Ora also notes that the National Planning Standards 2016 – Mapping Standard Table 20 includes a number of specific overlay</p>	<ol style="list-style-type: none"> <li>4. Revise reference throughout plan from “flood hazard overlays” to “flood hazard areas”.</li> <li>5. Consequential changes to give effect to this submission.</li> </ol>

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				<p>and other symbols, but none relate to flooding.</p> <p>To ensure the rule framework continues to be linked to identified flood hazards, Kāinga Ora suggests definitions be introduced as a consequential amendment to ensure the hazards are appropriately “identified” in the Plan. Such definitions are anticipated to include:</p> <ul style="list-style-type: none"> <li>• Flood Hazard – Stream Corridor</li> <li>• Flood Hazard - Overland Flowpath</li> <li>• Flood Hazard – Inundation</li> <li>• High Hazard Area</li> <li>• 1% Annual Exceedance Probability Flood.</li> </ul> <p>Kāinga Ora otherwise supports the mapping of other, non-flooding natural hazards to be incorporated into the District Plan maps, such as</p>	

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				Liquefaction and Fault Hazards (in addition to Coastal Hazards), as these hazards are less subject to change.	
20.	Chapter 1 – 1.10.11 Lessening Natural Hazards	Objective	Support in part	<p>Kāinga Ora supports the intent of this policy, as it adheres to a risk-based hazard planning framework, which recognises the importance of people, property, and infrastructure in hazard planning.</p> <p>Kāinga Ora seeks amendments to clarify the overarching outcome that the objective seeks to achieve; to reflect that the District Plan should seek to reduce risk both through reduction as well as no increase in risk to people, property and infrastructure; and to be more regionally consistent.</p>	<p><i>Replace:</i>  <del>To avoid or mitigate the vulnerability and risk of people and development to natural hazards. reduce the risk to people, property and infrastructure from natural and coastal hazards.</del></p> <p><i>With:</i>  <u>Subdivision, use and development within identified natural hazard areas reduce or do not increase the risk from natural and coastal hazards to people, property and infrastructure.</u></p>
21.	Chapter 1 – 1.10.11 Lessening Natural Hazards	Policy	Support in part	Kāinga Ora generally supports the broader intent of this policy and the risk-based approach to the management of natural hazards but opposes detail within. Kāinga Ora seeks the insertion of a qualifying	<p><i>Amendments sought</i></p> <p><del>(a) To manage the siting of buildings and structures within the Wellington Fault Special Study Area.</del></p>

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				statement to apply to the avoidance directive of strand (ca) of the policy. Suggested wording offered.	<p><u>(aa) To manage subdivision, use and development that results in buildings 20m either side of the Wellington Fault.</u></p> <p>(b) To limit the scale and intensity of development in areas susceptible to the landslide hazard.</p> <p><del>(c) To limit the scale and density of development in areas where the risk of flooding is medium to high.</del></p> <p><u>(ca) To avoid subdivision, development and use in high flood hazard areas, unless it can be demonstrated that:</u></p> <ul style="list-style-type: none"> <li>i. <u>The activity or subdivision has an operational and functional need to locate within the stream corridor and locating outside of the stream corridor is not a practicable option;</u></li> <li>ii. <u>Mitigation measures are incorporated that reduce or avoid an increase in risk to people and property from the 1% Annual Exceedance Probability Flood;</u></li> <li>iii. <u>People can safely evacuate the property during a 1% Annual Exceedance Probability flood; and</u></li> </ul>

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					<p>iv. <a href="#">The conveyancing of flood waters through the stream corridor is still able to occur unimpeded and is not diverted onto adjacent properties.</a></p> <p><a href="#">(cb) To manage subdivision, development and use in medium flood hazard areas</a></p> <p><a href="#">(cc) To require mitigation for new development in low flood hazard areas.</a></p> <p><a href="#">(h) To manage areas susceptible to coastal hazards such as coastal erosion and sea level rise.</a></p> <p><a href="#">(da) To manage subdivision, development and use in medium and high coastal hazard areas.</a></p> <p><a href="#">(db) To limit the density of development in medium and high coastal hazard areas.</a></p>
22.	Chapter 1 – 1.10.11 Lessening Natural Hazards	Explanation and Reasons – Flood Hazard	Support in part	Kāinga Ora generally supports the explanation, but seeks consequential changes to give effect to the broader submission that flood hazard maps sit outside of the District Plan.	<p><i>Amendments sought</i></p> <p><b>Flood Hazard</b>            The Hutt River, Wainuiomata River and local streams have the potential to overflow their banks during long continuous periods of rainfall. <a href="#">Three flood hazards overlays have been identified to inform areas at risk to</a></p>



ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><u>flooding. These are Stream Corridor, Overland Flowpath and Inundation Areas.</u></p> <ul style="list-style-type: none"> <li>• <u>The Inundation Area Overlay identifies is the modelled extent of inundation expected in a 1:100 year flood event. In these areas it may be necessary to mitigate the impacts of flooding.</u></li> <li>• <u>The Overland Flowpath Overlay identifies is the modelled path followed by rainwater during a 1:100 year storm event. In these areas it is necessary to manage development to ensure overland flowpaths are not impeded.</u></li> <li>• <u>The Stream Corridor Overlay identifies is the modelled extent of rivers and streams during a 1:100 year storm event. It is necessary to avoid development in these areas due to the risks associated with the velocity and volume of water flow during the storm event.</u></li> </ul> <p><u>The overlays applied identified flood hazard areas incorporate the anticipated effects of climate change such as sea level rise and increased rainfall intensity.</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><a href="#">Note: The Council holds publicly available information showing the modelled extent of flooding affecting specific properties in its GIS viewer. The maps are non-statutory and can be reviewed to take account of any property-specific information.</a></p> <p><del>In areas where the risk of flooding is medium to high the scale of density and development is limited, being set aside as rural and open space.</del></p>
<b>Chapter 3 - Definitions</b>					
23.	Chapter 3 - Definitions	Construction	Support in part	Kāinga Ora generally supports the intent of this definition, but notes that the definition includes the defined term within its explanation. Kāinga Ora seeks an amendment.	<p><i>Amend as follows:</i></p> <p><del>Includes construction and conversion, and additions and alterations to an existing building.</del></p> <p><a href="#">means undertaking or carrying out any of the following building works:</a></p> <ul style="list-style-type: none"> <li>a) <a href="#">erection of new buildings and structures;</a></li> <li>b) <a href="#">additions and alterations to existing buildings and structures (including conversion);</a></li> </ul>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p>c) <a href="#">total or partial demolition or removal of an existing building or structure;</a></p> <p>d) <a href="#">relocation of a building.</a></p>
24.	Chapter 3 - Definitions	<a href="#">Flood Hazard -Inundation</a>	NEW TERM	<p>Kāinga Ora seeks the introduction of a new definition “Flood Hazard - Inundation”, to ensure these hazard areas are identified in the plan. Kāinga Ora provides a suggested definition, but ultimately seeks a suitable definition to achieve this purpose.</p>	<p><b><a href="#">Flood Hazard - Inundation</a></b></p> <p><a href="#">Area of ponding that is greater than 50mm in depth in 1% AEP flood event (assuming 15% increase in rainfall under climate change) and which has low velocity flows.</a></p> <p><i><a href="#">Note: The Council holds publicly available information showing the modelled extent of flooding affecting specific properties in its GIS viewer. The maps are non-statutory and can be reviewed to take account of any property-specific information.</a></i></p>
25.	Chapter 3 - Definitions	<a href="#">Flood Hazard -Overland Flowpath</a>	NEW TERM	<p>Kāinga Ora seeks the introduction of a new definition “Flood Hazard – Overland Flowpath”, to ensure these areas hazard are identified in the plan. Kāinga Ora provides a suggested definition, but ultimately seeks a suitable definition to achieve this purpose.</p>	<p><b><a href="#">Flood Hazard – Overland Flowpath</a></b></p> <p><a href="#">Area of land that conveys stormwater when the pipe or stream network capacity is exceeded or blocked in a 1% AEP flood event (assuming 15% increase in rainfall under climate change).</a></p> <p><i><a href="#">Note: The Council holds publicly available information showing the modelled extent of</a></i></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<i><a href="#">flooding affecting specific properties in its GIS viewer. The maps are non-statutory and can be reviewed to take account of any property-specific information.</a></i>
26.	Chapter 3 - Definitions	<a href="#">Flood Hazard -Stream Corridor</a>	NEW TERM	Kāinga Ora seeks the introduction of a new definition “Flood Hazard – Stream Corridor”, to ensure these areas hazard are identified in the plan. Kāinga Ora provides a suggested definition, but ultimately seeks a suitable definition to achieve this purpose.	<p><b><a href="#">Flood Hazard – Stream Corridor</a></b></p> <p><a href="#">Corridor consisting of a buffer of five metres either side of the centre of the stream, where in a 1% AEP flood event (assuming 15% increase in rainfall under climate change) the water depth exceeds 1m and the water velocity is greater than 2m per second.</a></p> <p><i><a href="#">Note: The Council holds publicly available information showing the modelled extent of flooding affecting specific properties in its GIS viewer. The maps are non-statutory and can be reviewed to take account of any property-specific information.</a></i></p>
27.	Chapter 3 - Definitions	<a href="#">High Hazard Area</a>	NEW TERM	Kāinga Ora seeks the introduction of a new definition “High Hazard Area”, to ensure these are identified in the plan. Kāinga Ora provides a suggested definition, but ultimately seeks a suitable definition to achieve this purpose.	<p><b><a href="#">High Hazard Area</a></b></p> <p><a href="#">Land within any of the following Natural and Coastal Hazard Areas:</a></p> <ul style="list-style-type: none"> <li>a) <a href="#">Tsunami Hazard – 1:100 year scenario inundation extent; or</a></li> <li>b) <a href="#">Coastal Hazard – existing coastal inundation extent with a 1:100 year storm;</a></li> </ul>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p>c) <a href="#">Flood Hazard - Stream Corridor (1:100 year inundation event + 1m sea level rise); or</a></p> <p>d) <a href="#">Wellington Fault Rupture (within 20m of known fault)</a></p> <p><i>Note: The Council holds publicly available information showing the modelled extent of flooding affecting specific properties in its GIS viewer. The maps are non-statutory and can be reviewed to take account of any property-specific information.</i></p>
28.	Chapter 3 - Definitions	Net Site Area	Support	Kāinga Ora supports the amendments that bring this definition into alignment with the National Planning Standards defined term.	<i>Retain as notified</i>
29.	Chapter 3 - Definitions	Rapid Transit Stop	Support	Kāinga Ora supports the proposed definition.	<i>Retain as notified</i>
30.	Chapter 3 - Definitions	Residential unit	Support	Kāinga Ora supports the proposed definition.	<i>Retain as notified</i>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
<b>Chapter 4 – Residential</b>					
31.	Chapter 4 - Residential	Mapping	Support in part	<p>Kāinga Ora generally supports the intent of PC56 to provide intensification within walkable catchments but seeks that these are extended to better align with Policy 3 of the NPS-UD and to achieve a consistent approach to the residential zone framework throughout the region.</p> <p>Indicative mapping changes are outlined in Appendix 2 based on walkable catchment analysis taking into consideration amenities and connectivity. Mapping changes are required to better achieve well-functioning urban environments and national and regional consistency.</p> <p>Changes include:</p> <ul style="list-style-type: none"> <li>• Rezoning residential areas around the centres of Eastbourne, Stokes Valley and Wainuiomata from</li> </ul>	<ol style="list-style-type: none"> <li>1. Kāinga Ora seeks amendments to the planning maps to reflect the amendments sought to the commercial centres, centres hierarchy, and increased intensification of the HDRAA and MDRAA to better achieve well-functioning urban environments and national and regional consistency.</li> <li>2. The key changes sought are outlined in <b>Appendix 2</b>.</li> <li>3. Seek for the expansion of the HDRAA to apply to areas that are generally:             <ol style="list-style-type: none"> <li>i. Seek for the expansion of the HDRAA in 15min/1200m walkable catchment from the edge of the city centre;</li> <li>ii. Increase the maximum height to 43m (12 storeys) within a 400m/5-10min walkable catchment from the city centre, demonstrated with a Height Variation Control overlay;</li> </ol> </li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>HDRAA to MDRAA to better reflect the scale of anticipated urban built form in these locations, while also making explicit provision for increased height/intensification (via a height variation tool or similar) to enable heights of 18m (4-5 storeys) within a 5min/400m catchment of the centres. Kāinga Ora supports the use of HDRAA zone when heights of at least 6 storeys (22m) are enabled.</p> <ul style="list-style-type: none"> <li>Applying a height variation control elsewhere in the MDRAA within a 400m catchment of centres (the equivalent of Local Centres) to enable heights of 18m where the HDRAA applied in accordance with Policy 3(c) of the NPS-UD doesn't extend.</li> </ul>	<p>iii. Increase the maximum height to 29m (eight storeys) within a 800m/10min walkable catchment from the city centre, demonstrated with a Height Variation Control overlay;</p> <p>iv. Seek for the expansion of the HDRAA in 10min/800m walkable catchment from the edge of Petone Mixed Commercial Activity Areas;</p> <p>v. Increase the maximum heights to 36m (10 storeys) within a 400m/5-10min walkable catchment of the Petone commercial centre, demonstrated with a Height Variation Control overlay;</p> <p>vi. Seek for the expansion of the HDRAA in 10min/800m walkable catchment from rapid transit stops;</p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<ul style="list-style-type: none"> <li>• Enabling greater intensification through a height variation control overlay in the HDRAA within 800m of the city centre, 400m of Petone, Naenae and Waterloo.</li> <li>• Increasing the spatial extent of HDRAA around the centre of Naenae, which Kāinga Ora considers to be the equivalent of a Town Centre Zone.</li> </ul>	<p>vii. Seek for the expansion of the HDRAA in 10min/800m walkable catchment around the Suburban Mixed Use Activity Areas in Waterloo and Naenae; and</p> <p>viii. Increase the maximum heights to 29m (eight storeys) within a 400m/5-10min walkable catchment of the Waterloo and Naenae commercial areas, demonstrated with a Height Variation Control.</p> <p>4. Rezone the residential areas surrounding the centres of Eastbourne, Stokes Valley, and Wainuiomata to MDRAA.</p> <p>5. Apply a Height Variation Control of 18m height limit over the residential areas within a 5-10min/400m walkable catchment of these centres – Eastbourne, Stokes Valley and Wainuiomata.</p>



ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p>6. Apply the introduced Height Variation Control over residential areas within 400m of other identified centres – in Appendix 2. These are centres on Elizabeth Street, Burnside &amp; Lockett streets, and Stelin &amp; High streets.</p> <p>7. Accept all changes sought from Kāinga Ora to the planning maps as shown in <b>Appendix 2</b>.</p> <p>8. Other than the changes sought in this submission and in <b>Appendix 2</b>, retain the zoning as notified.</p> <p>9. Consequential amendments may be required to give effect to the changes sought and this submission.</p>
32.	Chapter 4 - Residential	Opening paragraphs	Support in part	<p>Kāinga Ora generally supports the introductory text and residential zoning framework. Some amendments are sought to reflect changes sought in the Kāinga Ora overarching submission. Kāinga Ora supports the application of the high density zone framework</p>	<p><i>Amendments sought:</i></p> <p>...</p> <p><a href="#">Existing Dwelling</a> densities range from high to low, within the context of this City. Higher dwelling densities can be found in Petone between the Esplanade and Jackson Street,</p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>in residential locations where heights of at least 6 storeys are enabled. Where heights between 3-5 storeys are enabled, Kāinga Ora seeks the underlying zoning framework to be a medium density zone, with a height variation control to enable additional height in identified areas. Kāinga Ora seeks a nationally consistent approach to zoning frameworks in this regard. A consequential change of this approach requires explicit provision to be made for increased height/intensification (via a height variation tool or similar) beyond three storeys in residential areas around identified centres (including around Eastbourne, Stokes Valley, and Wainuiomata, which were proposed to be located in the HDRAA chapter in PC56).</p> <p>For completeness, Kāinga Ora is also seeking additional height beyond 6 storeys (22m) around the city centre and Petone, Naenae and Waterloo.</p>	<p>which are a reflection of historical subdivision patterns. Medium densities are found in most parts of the City, whereas low dwelling densities are present in the steeper hillside areas of the Western Hills, Stokes Valley, Wainuiomata, and Eastbourne, and also in parts of Woburn, Military Road and Lowry Bay.</p> <p><b>(f) Medium Density Residential Activity Area</b></p> <p><del>This area provides opportunity for a variety of medium residential developments such as detached dwellings, terraced housing and low-rise apartments. It is mostly located around selected suburban centres and close to transport hubs and acts as a transitional area between higher density mixed use areas and low to medium density residential activity areas.</del></p> <p><u>The Medium Density Residential Activity Area covers a significant portion of Lower Hutt's residential areas, including areas in the Hutt Valley floor, Western Hills, Stokes Valley,</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>Changes are therefore sought to the introductory statement relevant to the new High Density Residential Area to describe the outcomes of the zone more appropriately.</p> <p>Amendments are sought to introductory paragraph to clarify that the description of density is based on existing residential development and not the planned built urban form.</p>	<p><u>Wainuiomata and Eastern Bays. The Medium Density Residential Activity Area typically covers areas that have a lower level of access to commercial centres, community facilities and rapid transit services than areas in the High Density Residential Activity Area.</u></p> <p><u>However, building heights and densities are expected to change over time. A mix of low to medium density residential development is permitted in the Medium Density Residential Activity Area. This includes stand-alone, and multi-unit developments (such as semi-detached, and terraced housing, and low-rise apartments) of three storeys. Some areas within the Medium Density Residential Activity Area have also been identified as being suitable to accommodate a higher density of residential development, subject to scale and design. These areas are within a walkable catchment of a local centre and are supported by a well-functioning urban environment. Resource consent is required for higher density development that does not</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><u>meet the development standards for the zone.</u></p> <p><b><u>(g) High Density Residential Activity Area</u></b></p> <p><u>The High Density Residential Activity Area covers residential areas with good access to a range of commercial activities, community facilities and public transport. This includes areas surrounding train stations, the Lower Hutt city centre, Petone metropolitan centre and some suburban centres.</u></p> <p><u>Opportunities for a variety of medium and high density residential developments such as detached dwellings, terraced housing and low-rise apartments are provided for in this Activity Area. Higher density development is enabled in the High Density Residential Activity Area by permitting multi-unit developments of up to three-storey buildings and enabling taller buildings through a resource consent process. The High Density Residential Activity Area anticipates a built urban environment of at least six storeys, with greater intensification enabled in identified</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<a href="#">areas surrounding the Lower Hutt city centre and Petone, Naenae and Waterloo.</a>
33.	Chapter 4A – General Residential Activity Area	Entire chapter	Support	Kāinga Ora supports the deletion of this chapter.	<i>Delete as proposed</i>
34.	Chapter 4B – Special Residential Activity Area	Entire chapter	Support	Kāinga Ora supports the deletion of this chapter.	<i>Delete as proposed</i>
35.	Chapter 4C – Historic Residential Activity Area	Entire chapter	Support	Kāinga Ora supports the deletion of this chapter.	<i>Delete as proposed</i>
<b>Chapter 4F Medium Density Residential Activity Area</b>					
36.	Chapter 4F – Medium Density Residential Activity Area	4F 1 Introduction/ Zone Statement	Support in part	Kāinga Ora generally supports the intent of this introduction statement but seeks some changes to simplify, while also clearly noting that further intensification is encouraged in the policy framework and enabled around key centres and areas that are well serviced by transport and amenities.	<i>Amend as follows:</i>  ... <a href="#">Built development is provided for in the Medium Density Residential Activity Area through a range of permitted activities and development standards that permit three residential units per site and buildings of up to three storeys. Development standards also address:</a>

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				<p>Kāinga Ora seeks that these areas are identified on the Planning Maps as height variation areas in the MDRAA. These areas are sought around a 5min/400m catchment of identified centres, including within Eastbourne, Stokes Valley, and Wainuiomata.</p> <p>It is acknowledged that these areas are currently proposed to be HDRAA in the notified plan change with a proposed height restriction control limiting height to 14m. Kāinga Ora seeks national and regional consistency in locating built form of this scale within a Medium Density Residential zone, with a height variation control to enable heights of 4-5 storeys (18m) within these areas. Consistent with its submission of other District Plan reviews and changes in the Wellington region, Kāinga Ora is seeking the same principle to be applied to a 400m catchment around centres that are the equivalent of a Local Centre. In</p>	<ul style="list-style-type: none"> <li>i. <a href="#"><u>the impacts of built development on adjoining sites and the streetscape,</u></a></li> <li>ii. <a href="#"><u>stormwater management, and</u></a></li> <li>iii. <a href="#"><u>provision of open space for residents.</u></a></li> </ul> <p><a href="#"><u>Development of four or more residential units are also encouraged through the policy framework and provided for through a resource consenting process in order to: <del>if a proposed development does not meet the development standards, resource consent is required in order to:</del></u></a></p> <ul style="list-style-type: none"> <li>i. <a href="#"><u>achieve a high quality built environment;</u></a></li> <li>ii. <a href="#"><u>manage the effects of development on neighbouring sites;</u></a></li> <li>iii. <a href="#"><u>achieve high quality onsite living environments; and</u></a></li> <li>iv. <a href="#"><u>achieve attractive and safe streets and public space.</u></a></li> </ul> <p>...</p> <p><a href="#"><u>The Medium Density Residential Activity Area covers a significant portion of Lower Hutt's residential areas, including areas in the Hutt Valley floor, Western Hills, Stokes Valley,</u></a></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>the case of Hutt City, this is relevant to catchments within 400m of the centre where the HDRAA doesn't otherwise apply through the implementation of Policy 3(c) of the NPS-UD.</p> <p>Kāinga Ora notes support for design guides sitting outside of the Plan, as a non-statutory tool to assist in assessing quality design outcomes.</p>	<p><u>Wainuiomata and Eastern Bays. The Medium Density Residential Activity Area typically covers areas that have a lower level of access to commercial centres, community facilities and rapid transit services than the High Density Residential Activity Area.</u></p> <p><u>While areas in the Medium Density Residential Activity Area are predominantly residential in nature, non-residential activities are provided for where they are compatible with the residential character of the area and serve the local community.</u></p> <p><u>The planned urban built character for the Medium Density Residential Activity Area is a mix of low to medium density development, including detached dwellings, terraced housing and low-rise apartments. It is expected that the urban built character of an area will arise from the flexibility provided for by the Plan for individual development to take any low to medium density form. This supports increasing the capacity and choice of housing within neighbourhoods. It is anticipated that the appearance of neighbourhoods in the Activity Area will change over time as the number of medium</u></p>

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					<p><a href="#">density residential developments increases, including through increased opportunities for terraced housing and low-rise apartments.</a> Within this context, the zone also recognises that additional height is appropriate in identified areas surrounding centres that are served by frequent public transport, a range of community services, schools, and other day-to-day services that will support growth intensification. These areas are around the centres, including Eastbourne, Stokes Valley, and Wainuiomata, and are identified by height variation controls on the planning maps.</p> <p>...</p>
37.	Chapter 4F – Medium Density Residential Activity Area	Objective 4F 2.1AA	Support	Kāinga Ora supports the objective.	<i>Retain as notified</i>
38.	Chapter 4F – Medium Density Residential Activity Area	Objective 4F 2.3	Support in part	Kāinga Ora generally supports the objective, but seeks amendments to provide for further intensification in areas in the MRZ with high accessibility to public transport, commercial amenity and community services.	<p><a href="#">The Medium Density Residential Activity Area provides for a variety of housing types and sizes that respond to:</a></p> <ul style="list-style-type: none"> <li><a href="#">i. Housing needs and demand, and</a></li> <li><a href="#">ii. The neighbourhood’s planned urban built character, including three-storey buildings, and additional height and density in areas of high accessibility to public transport,</a></li> </ul>



ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<a href="#">commercial amenity and community services.</a>
39.	Chapter 4F – Medium Density Residential Activity Area	Objective 4F 2.3A	Support in part	Kāinga Ora generally supports the objective but seeks some amendments to articulate the anticipated outcome more clearly.	<i>Amendments sought</i>  <u>Recognise that the neighbourhood’s planned urban built character is defined through the flexibility of individual developments to take any low to reflecting a medium density form of up to three storeys.</u>
40.	Chapter 4F – Medium Density Residential Activity Area	<a href="#">Objective 4F 2.3AA</a>	<a href="#">NEW OBJECTIVE</a>	<p>Kāinga Ora seeks a new objective to recognise that additional height (4-5 storeys) is provided in identified areas that are well supported by a well-functioning urban environment in the Medium Density Residential Activity Area.</p> <p>These areas are sought around the centres of Eastbourne, Stokes Valley, and Wainuiomata. It is acknowledged that these areas are currently proposed to be HDRAA in the notified plan change with a proposed a height restriction control limiting height to 14m.</p>	<i>New objective sought</i>  <u>A greater intensity of built form (4-5 storeys) is provided for around identified centres that are supported by a well-functioning urban environment.</u>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				Kāinga Ora seeks national/regional consistency in locating built form of this scale within a Medium Density Zone, with a height variation control to enable heights of 4-5 storeys (18m) within these areas.	
41.	Chapter 4F – Medium Density Residential Activity Area	Objective 4F 2.5	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified</i>
42.	Chapter 4F – Medium Density Residential Activity Area	Objective 4F 2.8	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified</i>
43.	Chapter 4F – Medium Density Residential Activity Area	Policy 4F 3.2	Support in part	Kāinga Ora supports this policy, which is required by schedule 3A of the Act, however, seeks an addition to the policy to recognise the need for additional height and density in areas of high accessibility.	<i>Amendments sought:</i>  <u>Enable a variety of housing types with a mix of densities within the Medium Density Residential Activity Area, including three-storey attached and detached dwellings and low-rise apartments, and additional height and density in areas of high accessibility to</u>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<a href="#">public transport, commercial amenity and community services.</a>
44.	Chapter 4F – Medium Density Residential Activity Area	Policy 4F 3.2A	Support	Kāinga Ora supports this policy, which is required by schedule 3A of the Act.	<i>Retain as notified</i>
45.	Chapter 4F – Medium Density Residential Activity Area	Policy 4F 3.2B	Support	Kāinga Ora supports this policy, which is required by schedule 3A of the Act.	<i>Retain as notified</i>
46.	Chapter 4F – Medium Density Residential Activity Area	Policy 4F 3.2C	Support	Kāinga Ora supports the policy.	<i>Retain as notified</i>
47.	Chapter 4F – Medium Density Residential Activity Area	Policy 4F 3.2D	Support	Kāinga Ora supports the policy.	<i>Retain as notified</i>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
48.	Chapter 4F – Medium Density Residential Activity Area	<a href="#">Policy 4F 3.2E</a>	<a href="#">NEW POLICY</a>	Kāinga Ora seeks the addition of a new policy that provides specific policy guidance for residential intensification and the design outcomes anticipated in such developments. This policy is later referred to as a matter of discretion within the relevant rule. An alternative relief would be providing this guidance directly into the matters of discretion within the rule.	<p><a href="#">Provide for residential intensification of a site where it can be demonstrated that the development contributes positive design outcomes and living environments, taking into consideration the following design objectives as relevant to the specific site, development type, and the planned urban built environment of the zone:</a></p> <p><i><a href="#">Built form:</a></i></p> <ol style="list-style-type: none"> <li>1. <a href="#">Optimise the quality of the built outcome with an integrated, comprehensive design approach.</a></li> <li>2. <a href="#">Achieve a positive frontage to the street.</a></li> <li>3. <a href="#">Achieve visual interest and avoid visual monotony while also achieving aesthetic coherence and integration.</a></li> <li>4. <a href="#">Achieve driveways, manoeuvring and parking areas that are safe, convenient and attractive.</a></li> </ol> <p><i><a href="#">Amenity and well-being</a></i></p> <ol style="list-style-type: none"> <li>5. <a href="#">Integrate building form and open space design to achieve high internal amenity and form well-located and usable private open spaces.</a></li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<ul style="list-style-type: none"> <li>6. <a href="#">Achieve reasonable sunlight, daylight and outlook.</a></li> <li>7. <a href="#">Provide reasonable internal visual privacy for all units within a development.</a></li> <li>8. <a href="#">Ensure outdoor living areas are well-located, functional for the intended use, and high quality.</a></li> <li>9. <a href="#">Achieve visual amenity, safety and functionality with planting.</a></li> <li>10. <a href="#">Achieve high quality, legible and efficient circulation.</a></li> <li>11. <a href="#">Provide for servicing that is suitably generous, convenient and visually discreet.</a></li> </ul>
49.	Chapter 4F – Medium Density Residential Activity Area	Policy 4F 3.3	Support	Kāinga Ora supports the policy.	<i>Retain as notified</i>
50.	Chapter 4F – Medium Density Residential Activity Area	Policy 4F 3.4	Support	Kāinga Ora supports the deletion of these policies	<i>Delete as proposed</i>
Policy 4F 3.5					

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
51.	Chapter 4F – Medium Density Residential Activity Area	Policy 4F 3.6	Oppose	Kāinga Ora notes that changes are not proposed to this policy in the Plan Change. However, Kāinga Ora seeks amendment to recognise the changing built form will not always result in the maintenance of privacy and sunlight. Policy 6 of the NPS-UD is clear that amenity levels will change through a changing urban built form.	<i>Amendments sought</i>  Require built development to <a href="#">maintain a reasonable level</a> <a href="#">make adequate provision for</a> of privacy and sunlight access <del>for</del> <a href="#">to</a> adjoining sites, <a href="#">having regard to the planned urban built environment for the zone.</a>
52.	Chapter 4F – Medium Density Residential Activity Area	Policy 4F 3.7	Support	Kāinga Ora supports the deletion of this policy	<i>Delete as proposed</i>
53.	Chapter 4F – Medium Density Residential Activity Area	Policy 4F 3.8	Support	Kāinga Ora supports this policy, which is required by schedule 3A of the Act.	<i>Retain as notified</i>
54.	Chapter 4F – Medium Density Residential Activity Area	Policy 4F 3.10	Support	Kāinga Ora generally supports this policy.	<i>Retain as notified</i>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
55.	Chapter 4F – Medium Density Residential Activity Area	Policy 4F 3.13	Support	Kāinga Ora generally supports this policy.	<i>Retain as notified</i>
56.	Chapter 4F – Medium Density Residential Activity Area	Rules 4F 4.1.1 to 4F 4.1.10	Support	Kāinga Ora notes no changes of note are proposed and supports these rules.	<i>Retain as notified</i>
57.	Chapter 4F – Medium Density Residential Activity Area	Rule 4F 4.11 Vegetation Removal	Oppose	Kāinga Ora opposes the proposed changes to this rule and seeks the retention of the existing rule. Kāinga Ora considers the proposed rule to be too broad sweeping and may constrain the supply of housing. The District Plan already requires minimum onsite landscaping in this zone, and Notable Trees are protected elsewhere in the Plan. Kāinga Ora acknowledges that the Council must give effect to higher order planning documents in the identification and protection of indigenous biodiversity but considers the rule, as proposed, is inappropriate.	<i>Delete entire proposed rule.</i> <i>Replace with:</i> a) <a href="#">The removal of vegetation (whether indigenous or exotic) is a permitted activity.</a>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
58.	Chapter 4F – Medium Density Residential Activity Area  4F 4.2 Development Standards	Rule 4F 4.2.1AA Number of Residential Units per Site	Support in part	<p>Kāinga Ora generally supports this rule but seeks changes to clarify that the rule applies to construction of new residential units, as well as amendments to the matters of discretion.</p> <p>Kāinga Ora supports the non-notification clauses, which is consistent with the prescribed MDRS.</p>	<p><i>Amendments sought</i></p> <p><b><u>Rule 4F 4.2.1AA - Number of Residential Units per Site</u></b></p> <ol style="list-style-type: none"> <li>1. <u>No more than three residential units occupy the site; and</u></li> <li>2. <u>Compliance with the following standards is achieved:</u> <ol style="list-style-type: none"> <li>i. <u>4F 4.2.1 - building coverage</u></li> <li>ii. <u>4F 4.2.2 – building height;</u></li> <li>iii. <u>4F 4.2.3 – HIRTB;</u></li> <li>iv. <u>4F 4.2.4 –only in relation to the rear/side yard boundary setback</u></li> <li>v. <u>4F 4.2.11 – outlook space</u></li> </ol> </li> </ol> <p><b><u>Activity status: Restricted discretionary</u></b> <b><u>Where:</u></b></p> <ol style="list-style-type: none"> <li>a. <u>Compliance is not achieved with 4F 4.2.1AA(1):</u></li> </ol> <p><b><u>Matters of discretion are restricted to:</u></b></p> <ol style="list-style-type: none"> <li>1. <u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood;</u></li> </ol>



ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p>2. <a href="#">The development contributes to a safe and attractive public realm and streetscape;</a></p> <p>3. <a href="#">The extent and effects on the three waters infrastructure, achieved by demonstrating that at the point of connection the infrastructure has the capacity to service the development; and</a></p> <p>4. <a href="#">The degree to which the development delivers quality on-site amenity and occupant privacy that is appropriate for its scale.</a></p> <p><b><a href="#">Activity status: Restricted discretionary</a></b>  <b><a href="#">Where:</a></b></p> <p>b. <a href="#">Compliance is not achieved with 4F 4.2.1AA(2).</a></p> <p><b><a href="#">Matters of discretion are restricted to:</a></b></p> <p>1. <a href="#">The extent and effect of non-compliance with any relevant standard as specified in the associated assessment criteria for the infringed standard.</a></p> <p><b><a href="#">Notification:</a></b></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p>1. <u>An application for resource consent which complies with 4.2.1AA(1) but does not comply with 4.2.1AA(2) is precluded from being publicly notified.</u></p> <p>2. <u>An application for resource consent made which does not comply with 4.2.1AA(1) but complies with 4.2.1AA(2) is precluded from being either publicly or limited notified.</u></p> <p>3. <u>An application for resource consent made which does not comply with 4.2.1AA(1) and 4.2.1AA(2) but complies 4F 4.2.2 – building height and 4F 4.2.1 - building coverage is precluded from being either publicly or limited notified.</u></p> <p><u>(a) Up to three residential units per site are a <del>permitted</del> activity.</u></p> <p><u>(b) Four or more residential units per site are a <del>restricted discretionary</del> activity.</u></p> <p><b><u>Discretion is restricted to:</u></b></p> <p><u>(i) The planned urban built character for the Medium Density Residential Activity Area.</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><del>(ii) The matters in Policies 4F 3.2B and 4F 3.8.</del></p> <p><del>(iii) The on-site amenity for future occupants of the development.</del></p> <p><del>(iv) The capacity of the network infrastructure for water supply, wastewater, stormwater and land transport to service the proposed development.</del></p> <p><del>(v) Any positive effects, including positive effects of increasing housing capacity and variety.</del></p> <p><del>(vi) The following design elements:</del></p> <ol style="list-style-type: none"> <li><del>1. Building height</del></li> <li><del>2. Recession planes and setbacks</del></li> <li><del>3. Indoor and outdoor living spaces</del></li> <li><del>4. Open space and boundary treatments</del></li> <li><del>5. Entrances, carparking and garages</del></li> <li><del>6. Onsite stormwater management</del></li> <li><del>7. End / side wall treatment</del></li> <li><del>8. Building materials</del></li> <li><del>9. Bike parking, storage and service areas</del></li> <li><del>10. Privacy and safety</del></li> <li><del>11. Landscaping</del></li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><del>When considering the Council will be guided by its Medium Density Design Guide.</del></p> <p><del>Public and limited notification is precluded for resource consent applications under Rule 4F 4.2.11A(b).</del></p>
59.	Chapter 4F – Medium Density Residential Activity Area (Rules)	Rule 4F 4.2.1 Building Coverage	Support in part	<p>Kāinga Ora supports the Restricted Discretionary activity status of this rule where the permitted standard is not complied with.</p> <p>Kāinga Ora seeks removal of the note, which advises that the (non-statutory) design guide will be used as a tool to assess the effects of a proposal that exceeds this density standard. Assessment of site coverage breaches are at the lower end of consenting complexity and do not require a qualitative assessment against a design guide.</p> <p>Kāinga Ora supports the preclusion of public notification for any breach to this rule.</p>	<p><i>Amendments sought</i></p> <p>...</p> <p><b>Discretion is restricted to:</b></p> <p><u>(iaa)The planned urban built character for the Medium Density Residential Activity Area.</u></p> <ul style="list-style-type: none"> <li>(i) The effects on the privacy of adjoining sites.</li> <li>(ii) The effects on the amenity of the surrounding residential area, the streetscape and adjoining public space.</li> </ul> <p><del>Note: When addressing or assessing potential effects in relation to matters (i) and (ii) above, applicants and the Council can be informed by the relevant outcomes identified in the Medium Density Design Guide.</del></p> <p><u>Public notification is precluded for resource consent applications under Rule 4F 4.2.1(b).</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
60.	Chapter 4F – Medium Density Residential Activity Area (Rules)	Rule 4F 4.2.2  Building height	Support in part	<p>Kāinga Ora supports the maximum permitted height standard aligning with the MDRS across much of the MDRAA. However, Kāinga Ora seeks an amended rule framework that provides for additional height allowance in identified areas around centres and in areas well serviced by public transport and community. Kāinga Ora also seeks that these areas are identified on the planning maps. The areas where additional height is being sought are within a 400m catchment of the centres of Eastbourne, Stokes Valley, and Wainuiomata, and in areas within the MDRAA surrounding local centres that are not otherwise zoned HDRAA through the course of implementing Policy 3(c) of the NPSUD.</p> <p>Kāinga Ora supports the Restricted Discretionary activity status of this rule where the permitted standard is not complied with.</p>	<p><i>Amendments sought</i></p> <p>(a) Construction or alteration of a building is a <b>permitted</b> activity if:</p> <p>(i) The building does not exceed a maximum height of <del>10m</del> <u>11m</u> except that 50% of a building's roof in elevation, measured vertically from the junction between wall and roof, may exceed this height by 1m where the entire roof slopes 15 degrees or more.</p> <p><u>(ii) 18m on sites subject to the Height Variation Control shown on the planning maps</u></p> <p>...</p> <p><u>(b) Construction or alteration of a building that does not comply with Rule 4F 4.2.2(a) is a restricted discretionary activity.</u></p> <p><b>Discretion is restricted to:</b></p> <p><u>(iaa) The planned urban built character for the Medium Density Residential Activity Area.</u></p> <p>(i) The effects on the privacy of adjoining sites.          (ii) The effects on shading of adjoining sites <u>including the impacts of shading on their</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>Kāinga Ora seeks simplification of the prescribed matters of discretion, and therefore seeks the deletion of the strand relating to the listed “design elements”. These matters are adequately addressed either within the remaining matters of discretion, and/or by other density standards.</p> <p>Kāinga Ora also seeks removal of the note, which advises that the (non-statutory) design guide will be used as a tool to assess the effects of a proposal that exceeds this density standard.</p> <p>Kāinga Ora supports the preclusion of public notification for any breach to this rule.</p>	<p><u>primary internal and external living areas throughout the year.</u></p> <p>(iii) The effects on the amenity of the surrounding residential area and adjoining streetscape.</p> <p><u>(iiia) The effects of shading and additional building bulk on any public open space or recreational grounds and their ability to provide outdoor amenity to users.</u></p> <p><u>(iiib) Any design features or articulation to reduce the bulk of the building when viewed from neighbouring properties.</u></p> <p><del>(iv) The following mixed use and medium density residential development design elements:</del></p> <ol style="list-style-type: none"> <li><del>1. Building height</del></li> <li><del>2. Recession planes and setbacks</del></li> <li><del>3. Indoor and outdoor living spaces</del></li> <li><del>4. Open space and boundary treatments</del></li> <li><del>5. Entrances, carparking and garages</del></li> <li><del>6. Onsite stormwater management</del></li> <li><del>7. End / side wall treatment</del></li> <li><del>8. Building materials</del></li> <li><del>9. Bike parking, storage and service areas</del></li> <li><del>10. Privacy and safety</del></li> <li><del>11. Landscaping</del></li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><del>When considering the matters in (iv), the Council will be principally guided by its Medium Density Design Guide.</del></p> <p><del>Public notification is precluded for resource consent applications under Rule 4F 4.2.2(b).</del></p>
61.	Chapter 4F – Medium Density Residential Activity Area (Rules)	Rule 4F 4.2.3 Height in relation to boundary	Support in part	<p>Kāinga Ora supports the height in relation to boundary (HIRB) standard, which reflects the MDRS. However, Kāinga Ora seeks an amended rule framework that provides for a more flexible HIRB in identified areas around centres. Kāinga Ora also seeks that these areas are identified on the planning maps.</p> <p>Kāinga Ora supports the Restricted Discretionary activity status of this rule where the permitted standard is not complied with. Kāinga Ora seeks simplification of the prescribed matters of discretion, and therefore seeks the deletion of the strand relating to the listed “design elements”. These matters</p>	<p><i>Amendments sought</i></p> <p>a) Construction or alteration of a building is a permitted activity if the following <del>recession plane height in relation to boundary</del> requirements are being met:</p> <p>(i) <del>3.5m +45° 4m +60°</del> from all side and rear boundaries; <u>or</u></p> <p>(ii) <u>Within areas subject to a height variation control to enable 18m only:</u></p> <p>a. <u>60° recession plane measured from a point 6 metres vertically above ground level along the first 22 metres of the side boundary as measured from the road frontage; and</u></p> <p>b. <u>60° recession plane measured from a point 4 metres vertically above ground level at:</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>are adequately addressed either within the remaining matters of discretion, and/or by other density standards.</p> <p>Kāinga Ora also seeks removal of the note, which advises that the (non-statutory) design guide will be used as a tool to assess the effects of a proposal that exceeds this density standard. A breach of this nature does not warrant a qualitative assessment against a design guide.</p> <p>Kāinga Ora supports the preclusion of public notification for any breach to this rule.</p>	<p>i. <a href="#">Any boundary further than 22 metres from the road frontage;</a> and ii. <a href="#">The common boundary of any site outside of the height variation control</a></p> <p>...</p> <p><a href="#">Where the boundary forms part of a legal right of way, entrance strip, access site, or pedestrian access way, the height in relation to boundary applies from the farthest boundary of that legal right of way, entrance strip, access site, or pedestrian access way.</a></p> <p><a href="#">This standard does not apply to:</a></p> <p>(a) <a href="#">A boundary with a road,</a> (b) <a href="#">Existing or proposed internal boundaries within a site, and</a> (c) <a href="#">Site boundaries where there is an existing common wall between two buildings on adjacent sites or where a common wall is proposed.</a></p> <p>(b) Construction or alteration of a building that does not meet the <del>recession plane</del> <a href="#">height in relation to boundary</a> requirements <a href="#">Rule 4F 4.2.3(a)</a> is a <b>restricted discretionary activity</b>.</p>



ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><b>Discretion is restricted to:</b></p> <p><u>(iaa) The planned urban built character for the Medium Density Residential Activity Area.</u></p> <p>(i) The effects on the privacy of adjoining sites.</p> <p>(ii) The effects on shading of adjoining sites, <u>including the impacts of shading on their primary internal and external living areas.</u></p> <p>(iii) The effects on the amenity of the surrounding residential <u>area</u> and adjoining streetscape.</p> <p><u>(iv) The impacts of shading and additional building bulk on any public open space or recreational grounds and their ability to provide outdoor amenity to users.</u></p> <p><del>(v) The following design elements:</del></p> <ol style="list-style-type: none"> <li><del>1. Building height</del></li> <li><del>2. Recession Planes</del></li> <li><del>3. End / side wall treatment</del></li> <li><del>4. Privacy and safety</del></li> </ol> <p><del>Note: When addressing or assessing potential effects in relation to matters (i) to (vi) above, applicants and the Council can be informed by</del></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><del>the relevant outcomes identified in the Medium Density Design Guide.</del></p> <p>Public notification is precluded for resource consent applications under Rule 4F 4.2.3(b).</p>
62.	Chapter 4F – Medium Density Residential Activity Area (Rules)	Rule 4F 4.2.4 Setbacks	Support in part	<p>Kāinga Ora generally supports the setbacks standard, which reflects the MDRS. However, adjustments are sought, to make the rule more effective.</p> <p>Kāinga Ora seeks simplification of the prescribed matters of discretion, and therefore seeks the deletion of the strand relating to the listed “design elements”. These matters are adequately addressed either within the remaining matters of discretion, and/or by other density standards.</p> <p>Kāinga Ora also seeks removal of the note, which advises that the (non-statutory) design guide will be used as a tool to assess the effects of a proposal that exceeds this density</p>	<p><i>Amendments sought</i></p> <p>(a) Construction or alteration of a building is a <b>permitted activity</b> if:</p> <p>...</p> <p><u>(i) Buildings are set back from the relevant boundary by the minimum depth listed below:</u></p> <p><u>Front yard: 1.5m</u></p> <p><u>Side yard: 1m</u></p> <p><u>Rear yard: 1m (excluded on corner sites)</u></p> <p><u>This standard does not apply to site boundaries where there is an existing common wall between 2 buildings on adjacent sites or where a common wall is proposed. Eaves may encroach into any yard by up to 0.6m.</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>standard. Assessment setbacks are at the lower end of consenting complexity and do not require a qualitative assessment against a design guide.</p> <p>Kāinga Ora supports the preclusion of public notification for any breach to this rule.</p>	<p>(b) Construction or alteration of a building that does not meet the <del>yard setback</del> requirements is a <b>restricted discretionary</b> activity.</p> <p><b>Discretion is restricted to:</b></p> <p><u>(iaa) The planned urban built character for the Medium Density Residential Activity Area.</u></p> <p>(i) The effects on the privacy of adjoining sites.</p> <p>(ii) The effects on the amenity of the surrounding residential area, the streetscape and adjoining public space.</p> <p><u>(iii) The effect from any building bulk and its proximity to the main internal and external living areas of adjoining residential properties.</u></p> <p><u>(iv) The following design elements:</u></p> <ol style="list-style-type: none"> <li><u>1. Building height</u></li> <li><u>2. Recession Planes</u></li> <li><u>3. End / side wall treatment</u></li> <li><u>4. Privacy and safety</u></li> </ol> <p><u>Note: When addressing or assessing potential effects in relation to matters (iaa) to (iv) above, applicants and the Council can be informed by the relevant outcomes identified in the Medium Density Design Guide.</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<a href="#"><u>Public notification is precluded for resource consent applications under Rule 4F 4.2.4(b).</u></a>
63.	Chapter 4F – Medium Density Residential Activity Area (Rules)	Rule 4F 4.2.4A  Height in Relation to Boundary and Setbacks for Sites Abutting Marae in the Community Iwi Activity Area	Support	Kāinga Ora generally supports this rule framework, noting that the more restrictive HIRB and setbacks are only applicable to sites directly abutting a marae in the Community Iwi Activity Area.	<i>Retain as notified.</i>
64.	Chapter 4F – Medium Density Residential Activity Area (Rules)	Rule 4F 4.2.5  Permeable Surface	Support in part	<p>Kāinga Ora generally supports the requirement to maintain a minimum permeable surface across 30% of the site area. However, Kāinga Ora seeks the removal of 4f 4.2.5 (b)(iv) (list of design elements) in its entirety along with the removal of the note referencing assessment being made against the design guide for this rule.</p> <p>Kāinga Ora seeks the preclusion of public and limited notification for any breach to this rule.</p>	<p><i>Amendments sought.</i></p> <p>a. Construction or alteration of a building, or new impermeable surfaces, is a <b>permitted</b> activity, if:</p> <p>(i) A minimum of 30% of the site area is a permeable surface.</p> <p>b. Construction or alteration of a building, or new impermeable surfaces, that do not meet the above permitted permeable surface requirements is a <b>restricted discretionary activity</b>.</p> <p><b>Discretion is restricted to:</b></p> <p>i. The effects on the stormwater system.</p> <p>ii. The potential for increased surface ponding and flooding.</p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p>iii. The mitigation of additional stormwater runoff through means such as onsite stormwater retention.</p> <p><del>(iv) The following mixed-use and medium density residential development design elements:</del></p> <ol style="list-style-type: none"> <li><del>1. Building height</del></li> <li><del>2. Recession planes and setbacks</del></li> <li><del>3. Indoor and outdoor living spaces</del></li> <li><del>4. Open space and boundary treatments</del></li> <li><del>5. Entrances, carparking and garages</del></li> <li><del>6. Onsite stormwater management</del></li> <li><del>7. End / side wall treatment</del></li> <li><del>8. Building materials</del></li> <li><del>9. Bike parking, storage and service areas</del></li> <li><del>10. Privacy and safety</del></li> <li><del>11. Landscaping</del></li> </ol> <p><del>When considering the matters in (v), the Council will be principally guided by its Medium Density Design Guide.</del></p> <p><u>Public and limited notification is precluded for resource consent applications under Rule 4F 4.2.5.</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
65.	Chapter 4F – Medium Density Residential Activity Area (Rules)	Rule 4F 4.2.6  Outdoor Living Space	Support in part	<p>Kāinga Ora generally supports the outdoor living space standard, which is consistent with the MDRS.</p> <p>However, Kāinga Ora seeks the removal of 4F 4.2.6 (b)(iii) (list of design elements) in its entirety along with the removal of the note referencing assessment being made against the design guide for this rule.</p> <p>Kāinga Ora seeks the preclusion of limited notification for any breach to this rule.</p>	<p><i>Amendments sought</i></p> <p>Delete:</p> <ol style="list-style-type: none"> <li>1. 4F 4.2.6(b)(iii) (list of design elements)</li> <li>2. Reference to assessment being made against the design guide</li> </ol> <p>Introduce:</p> <ol style="list-style-type: none"> <li>3. Notification preclusion clause for limited notification.</li> </ol>
66.	Chapter 4F – Medium Density Residential Activity Area (Rules)	Rule 4F 4.2.7  Accessory Building	Support in part	<p>Kāinga Ora supports the proposed administrative changes to this rule.</p> <p>Kāinga Ora seeks the introduction of a notification preclusion for public notification.</p>	<p><i>Amendments sought</i></p> <p>Introduce:</p> <ol style="list-style-type: none"> <li>1. Preclusion clause for public notification.</li> </ol>
67.	Chapter 4F – Medium Density Residential Activity Area (Rules)	Rule 4F 4.2.8  Screening and storage	Support in part	<p>Kāinga Ora notes this is an existing standard and only administrative changes are proposed. Kāinga Ora seeks these amendments go further resulting in the removal of 4F 4.2.8(b)(iii) (list of design elements) in its entirety along with the removal</p>	<p><i>Amendments sought</i></p> <p>Delete:</p> <ol style="list-style-type: none"> <li>1. 4F 4.2.8(b)(iii) (list of design elements)</li> <li>2. Reference to assessment being made against the design guide</li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				of the note referencing assessment being made against the design guide for this rule.	
68.	Chapter 4F – Medium Density Residential Activity Area (Rules)	Rule 4F 4.2.11  Outlook Space (per unit)	Support in part	Kāinga Ora supports this rule, but also seeks the preclusion of limited notification for any breach of this rule. Kāinga Ora also seeks the removal of the note referencing assessment being made against the design guide for a breach to this rule.	<i>Amendments sought</i>  Delete: <ol style="list-style-type: none"> <li>1. 4F 4.2.8(b)(iii) (list of design elements)</li> <li>2. Reference to assessment being made against the design guide</li> </ol> Introduce: <ol style="list-style-type: none"> <li>3. Preclusion clause for limited notification.</li> </ol>
69.	Chapter 4F – Medium Density Residential Activity Area (Rules)	Rule 4F 4.2.12  Windows to Street	Support in part	Kāinga Ora generally supports the windows to street standard, which is consistent with the MDRS.  However, Kāinga Ora seeks the removal of 4F 4.2.12 (b)(iii) (list of design elements) in its entirety along with the removal of the note referencing assessment being made against the design guide for this rule.	<i>Amendments sought</i>  Delete: <ol style="list-style-type: none"> <li>1. 4F 4.2.12(b)(iii) (list of design elements)</li> <li>2. Reference to assessment being made against the design guide</li> </ol> Introduce: <ol style="list-style-type: none"> <li>3. Preclusion clause for limited notification.</li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				Kāinga Ora seeks the preclusion of limited notification for any breach to this rule.	
70.	Chapter 4F – Medium Density Residential Activity Area (Rules)	Rule 4F 4.2.13 Landscaped Area	Support in part	<p>Kāinga Ora generally supports the landscaped area standard, which is consistent with the MDRS.</p> <p>However, Kāinga Ora seeks the removal of 4F 4.2.13 (b)(ix) (list of design elements) in its entirety along with the removal of the note referencing assessment being made against the design guide for this rule. Kāinga Ora seeks the preclusion of limited notification for any breach to this rule.</p>	<p><i>Amendments sought</i></p> <p>Delete:</p> <ol style="list-style-type: none"> <li>1. 4F 4.2.13(b)(ix) (list of design elements)</li> <li>2. Reference to assessment being made against the design guide</li> </ol> <p>Introduce:</p> <ol style="list-style-type: none"> <li>3. Preclusion clause for limited notification.</li> </ol>
71.	Chapter 4F 5 – Precincts and Schedules Sites	4F 5.1 Residential Heritage Precinct	Oppose in part	Kāinga Ora opposes (in part) of Council proposed heritage areas. Kāinga Ora has commissioned a heritage assessment, which has concluded that there are a number of proposed landholdings/buildings that have little heritage value, largely due to modifications that have significantly altered heritage and architectural values.	<p><i>Amendments sought</i></p> <p>Kāinga Ora seeks the following changes:</p> <ol style="list-style-type: none"> <li>1. Change to the boundary of the proposed heritage area HA-09 to exclude landholdings/buildings that (a) retain little heritage value due to modifications and (b) are considered not to contribute to the proposed housing area (consistent with the</li> </ol>



ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>Accordingly, Kāinga Ora seeks the following amendments to the proposed Petone State Flats Heritage Area.</p> <ol style="list-style-type: none"> <li>1. Change title of the heritage area to: “Petone State Housing Area”</li> <li>2. Change to the boundary of the proposed heritage area to exclude landholdings/buildings that (a) retain little heritage value due to modifications and (b) are considered not to contribute to the proposed housing area.</li> </ol> <p>Kāinga Ora also considers that qualifying matters should be identified as overlays and addressed as district-wide provisions, rather than precincts within zone based chapters. On this basis, Kāinga Ora requests that identified areas with recognised significant heritage values are managed and addressed with appropriate provisions and rules within a Heritage Chapter, in</p>	<p>amendments shown on the map attached at Appendix 2).</p> <ol style="list-style-type: none"> <li>2. Change the title of heritage area HA-09 to: Petone State <del>Flats</del> <u>Housing</u> Area</li> <li>3. Change to an overlay, not as a precinct.</li> <li>4. Relocate provisions and rules to the District-wide chapter, rather than being located within the residential chapters.</li> <li>5. Change the activity status of demolition of buildings from permitted to discretionary.</li> <li>6. Make any consequential amendments to give effect to this submission and the relief/s sought.</li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>accordance with the National Planning Standards.</p> <p>Kāinga Ora questions the presence of a permitted activity status for the demolition of buildings, as this would result in the potential loss of heritage buildings within the interim period that Council undertakes a plan change to review and strengthen the heritage provisions.</p>	
<b>Chapter 4G High Density Residential Activity Area</b>					
72.	Chapter 4G – High Density Residential Activity Area	Mapping	Support in part	<p>Kāinga Ora generally supports the introduction and application of a High Density Residential Zone.</p> <p>Opportunities for further high density housing are sought to support the role and function of a wider range of Centres in order to achieve well-functioning urban environments in accordance with the NPS-UD. Consequential changes to maps and provisions are sought to give effect to these changes.</p>	<ol style="list-style-type: none"> <li>1. Kāinga Ora seeks amendments to the planning maps to reflect the amendments sought to the commercial centres, centres hierarchy, and increased intensification of the HDRAA and MDRAA to better achieve well-functioning urban environments and national and regional consistency.</li> <li>2. The key changes sought are outlined in <b>Appendix 2</b>.</li> <li>3. Seek for the expansion of the HDRAA to apply to areas that are generally:</li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>Additional height is sought around the city centre and Petone Commercial Activity Area, and around the Naenae and Waterloo centre (the latter in recognition of the role and function this centre plays).</p> <p>Rather than restrict height in the HDRAA below six storeys around the commercial centres of Eastbourne, Stokes Valley and Wainuiomata, Kāinga Ora seeks that these surrounding residential areas instead be zoned as MDRAA and subject to a height variation control to enable heights of 4-5 storeys (18m). Consequential changes are sought in the MDRAA to give effect to this.</p>	<ul style="list-style-type: none"> <li>i. Seek for the expansion of the HDRAA in 15min/1200m walkable catchment from the edge of the city centre;</li> <li>ii. Increase the maximum height to 43m (12 storeys) within a 400m/5-10min walkable catchment from the city centre, demonstrated with a Height Variation Control overlay;</li> <li>iii. Increase the maximum height to 29m (eight storeys) within a 800m/10min walkable catchment from the city centre, demonstrated with a Height Variation Control overlay;</li> <li>iv. Seek for the expansion of the HDRAA in 10min/800m walkable catchment from the edge of Petone Mixed Commercial Activity Areas;</li> <li>v. Increase the maximum heights to 36m (10 storeys) within a 400m/5-10min walkable catchment of the Petone commercial centre;</li> </ul>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p>demonstrated with a Height Variation Control overlay;</p> <ul style="list-style-type: none"> <li>vi. Seek for the expansion of the HDRAA in 10min/800m walkable catchment from rapid transit stops;</li> <li>vii. Seek for the expansion of the HDRAA in 10min/800m walkable catchment around the Suburban Mixed Use Activity Areas in Waterloo and Naenae; and</li> <li>viii. Increase the maximum heights to 29m (eight storeys) within a 400m/5-10min walkable catchment of the Waterloo and Naenae commercial areas, demonstrated with a Height Variation Control.</li> </ul> <ul style="list-style-type: none"> <li>4. Rezone the residential areas surrounding the centres of Eastbourne, Stokes Valley, and Wainuiomata to MDRAA.</li> <li>5. Apply a Height Variation Control of 18m height limit over the residential areas within a 5-10min/400m walkable</li> </ul>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p>catchment of these centres – Eastbourne, Stokes Valley and Wainuiomata.</p> <p>6. Apply the introduced Height Variation Control over residential areas within 400m of other identified centres – in Appendix 2. These are centres on Elizabeth Street, Burnside &amp; Lockett streets, and Stelin &amp; High streets.</p> <p>7. Accept all changes sought from Kāinga Ora to the planning maps as shown in <b>Appendix 2</b>.</p> <p>8. Other than the changes sought in this submission and in <b>Appendix 2</b>, retain the zoning as notified.</p> <p>9. Consequential amendments may be required to give effect to the changes sought and this submission.</p>
73.	Chapter 4G – High Density Residential Activity Area	4F 1 Introduction/ Zone Statement	Support in part	Kāinga Ora generally supports the intent of this introduction statement but seeks some changes to frame the anticipated outcome of the zone	<p><i>Amend as follows:</i></p> <p><u>The High Density Residential Activity Area covers residential areas with a higher level of</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>and enable greater levels of intensification around key centres and areas that are well serviced by transport and amenities more effectively. Kāinga Ora seeks that these areas are identified on the Planning Maps as height variation areas.</p> <p>Kāinga Ora notes support for design guides sitting outside of the Plan, as a non-statutory tool to assist in assessing quality design outcomes.</p>	<p><u><a href="#">access to commercial activities and community facilities. This includes areas surrounding train stations, the Lower Hutt city centre and Petone metropolitan centre as well as some suburban centres.</a></u></p> <p><u><a href="#">While areas in the High Density Residential Activity Area are predominantly residential in nature, non-residential activities are provided for within the Activity Area where they are compatible with residential activities.</a></u></p> <p><u><a href="#">The planned urban built character for the High Density Residential Activity Area is high density residential development, including detached dwellings, terraced housing and apartments. The planned urban built character of the High Density Residential Activity Area includes buildings of at least six storeys in most of the Activity Area. The urban built character of an area will arise from the flexibility provided for by the Plan for individual development to take any low to high density form. This supports increasing the capacity and choice of housing within neighbourhoods. It is anticipated that the appearance of neighbourhoods in the High</a></u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><u>Density Residential Activity Area</u> It is expected that the <u>urban built form of an area will change over time</u> as the number of high density residential developments increases <u>including through increased opportunities for terraced housing and apartments.</u></p> <p><u>Built development is provided for in the High Density Residential Activity Area through a range of permitted activities and development standards that permit <del>three</del> six dwellings per site and buildings of up to six storeys in most of the Activity Area and four storeys for areas in Eastbourne, Stokes Valley and Wainuiomata.</u> Some areas have been identified as being suited to a more intensive built form through increased building heights than the standard zone height. These areas are located within a walkable catchment of the City Centre and Petone Commercial Activity Area, Naenae and Waterloo. They are identified on the planning maps as Height Variation Controls.</p> <p>...</p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><u>If a proposed development does not meet the development standards, resource consent is required in order to: Development of seven or more residential units is also encouraged through the policy framework and provided for through a resource consenting process in order to:</u></p> <ul style="list-style-type: none"> <li><u>i. achieve a high quality built environment;</u></li> <li><u>ii. manage the effects of development on neighbouring sites;</u></li> <li><u>iii. achieve high quality living environments; and</u></li> <li><u>iv. achieve attractive and safe streets and public spaces.</u></li> </ul> <p><u>Residential development that infringes 1 or more standards is also provided for through a resource consenting process.</u> The resource consent process enables the design and layout, <u>as well as potential or actual effects on the environment</u>, of development to be assessed, recognising that quality design is increasingly important as the scale and density of development increases. Council provides design guidance for residential</p>



ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p>developments through design guides that sit outside the plan.</p> <p><u>The planned urban built character of the High Density Residential Activity Area includes buildings of at least six storeys in most of the Activity Area and at least four storeys in Eastbourne, Stokes Valley and Wainuiomata. As buildings of this scale are likely to breach one or more development standard, resource consent is likely to be required. However, buildings of at least six storeys must be enabled within the walkable catchments of Lower Hutt city centre, Petone metropolitan centre and the city's train stations.</u></p>
74.	Chapter 4G – High Density Residential Activity Area	Objective 4G 2.1	Support	Kāinga Ora supports the objective.	<i>Retain as notified</i>
75.	Chapter 4G – High Density Residential Activity Area	Objective 4G 2.2	Support	Kāinga Ora supports the objective.	<i>Retain as notified</i>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
76.	Chapter 4G – High Density Residential Activity Area	Objective 4G 2.3	Support in part	Kāinga Ora generally supports the objective but seeks some amendments to more clearly articulate the anticipated outcome sought through the broader submission by Kāinga Ora.	<p><i>Amendments sought</i></p> <p><u>The High Density Residential Activity Area provides for a variety of housing types and sizes that respond to:</u></p> <ul style="list-style-type: none"> <li>i. <u>Housing needs and demand, and</u></li> <li>ii. <u>The neighbourhood’s planned urban built character, including six-storey buildings and between eight to twelve storeys in identified locations.</u></li> </ul>
77.	Chapter 4G – High Density Residential Activity Area	Objective 4G 2.4	Support in part	Kāinga Ora generally supports this objective, which recognises the differing scales of development that could occur in the High Density Residential Activity Area. Kāinga Ora seeks amendments to articulate the change more clearly in character that is anticipated in the planned urban built environment of the High Density Residential Activity Area.	<p><i>Amendments sought</i></p> <p><u>Recognise that the neighbourhood’s planned urban built character is defined through the flexibility of individual developments to take:</u></p> <ul style="list-style-type: none"> <li>i. <u>Any low to medium density form of up to three storeys, or</u></li> <li>ii. <u>A form of up to six storeys that achieves, for that development, the best practicable amenity outcomes for adjoining sites, or</u></li> <li>iii. <u>A taller form if compatible with the amenity levels associated with high density residential development of six storeys.</u></li> </ul>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
78.	Chapter 4G – High Density Residential Activity Area	Objective 4G 2.5	Support in part	Kāinga Ora generally supports the intent of this objective, but seeks alternative wording to more clearly articulate the overall outcome sought.	<p><i>Amendments sought</i></p> <p><u>Built development is of high quality and provides:</u></p> <ul style="list-style-type: none"> <li><del>i. appropriate on-site amenity for residents.</del></li> <li><del>ii. appropriate residential amenity for adjoining sites, and</del></li> <li><del>iii. a high level of amenity for the street.</del> <ul style="list-style-type: none"> <li>i. <u>healthy, safe and accessible living environments</u></li> <li>ii. <u>attractive and safe streets.</u></li> </ul> </li> </ul>
79.	Chapter 4G – High Density Residential Activity Area	Objective 4G 2.6	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified</i>
80.	Chapter 4G – High Density Residential Activity Area	Objective 4G 2.7	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified</i>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
81.	Chapter 4G – High Density Residential Activity Area	Objective 4G 2.8	Oppose	<p>Kāinga Ora does not support a reduced 4-storey height limit applying in areas adjacent to the centres of Eastbourne, Stokes Valley, and Wainuiomata.</p> <p>Kāinga Ora seeks a secondary height limit of 18m be introduced within the Medium Density Residential Activity Area within a 400 walkable catchment from the local commercial centre. This Objective is sought to be deleted from the HDRAA.</p>	<p><i>Delete objective</i></p> <p><u>Modify the general approach of the Activity Area in Eastbourne, Stokes Valley, and Wainuiomata to have a planned urban built character of:</u></p> <ul style="list-style-type: none"> <li><u>i. Any low to medium density form of up to three storeys, or</u></li> <li><u>ii. A form of up to four storeys that achieves, for that development, the best practicable amenity outcomes for adjoining sites, or</u></li> <li><u>iii. A taller form if compatible with the amenity levels associated with high density residential development of four storeys.</u></li> </ul>
82.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.1	Support	Kāinga Ora supports this policy.	<i>Retain as notified</i>
83.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.2	Oppose	Kāinga Ora acknowledges that this policy is a modified version of the mandatory provision under the MDRS, but notes this policy is more appropriately located in the Medium Density Residential Activity Area.	<p><i>Delete Policy</i></p> <p><u>Enable a variety of housing types with a mix of densities within the High Density Residential Activity Area, including three-storey attached</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<a href="#">and detached dwellings, and low-rise apartments.</a>
84.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.3	Support	Kāinga Ora supports the policy.	<i>Retain as notified</i>
85.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.4	Support	Kāinga Ora supports the inclusion of this MDRS provision.	<i>Retain as notified</i>
86.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.5	Support	Kāinga Ora supports the inclusion of this MDRS provision.	<i>Retain as notified</i>
87.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.6	Support	Kāinga Ora supports the policy.	<i>Retain as notified</i>
88.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.7	Support	Kāinga Ora supports the policy.	<i>Retain as notified</i>
89.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.8	Support in part	Kāinga Ora supports the intent of this policy, but seeks amended wording to articulate the issue more clearly being managed and the outcomes sought.	<i>Amendments sought</i>  <a href="#">Manage the effects of built development on adjoining sites and the street by controlling height, bulk and form of built development.</a>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				Replacement text is provided.	<a href="#">Manage the effects of built form that does not meet the permitted activity standards for height in relation to boundary, building set back, site coverage or height standards, by ensuring adequate provision of privacy and access to sunlight is made to neighbouring residential properties internal and external living areas, and the impact of building bulk and dominance is mitigated or remedied through design responses.</a>
90.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.9	Oppose	<p>Kāinga Ora opposes this policy, as it is inconsistent with anticipated change relating to the urban built form and amenity levels in the High Density Activity Area.</p> <p>Kāinga Ora does not support the use of the term “maintain” in the context of provision of privacy and sunlight access. Policy 6 of the NPS-UD is clear that amenity levels will change through a changing urban built form.</p>	<p><i>Delete Policy</i></p> <p><a href="#">Require the design of built development of up to three storeys to maintain a reasonable level of privacy and sunlight access for adjoining sites.</a></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				Kāinga Ora seeks deletion of this policy, noting that the broad range of alternative policies within Chapter 4G make adequate provision for amenity.	
91.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.10	Support in part	<p>Kāinga Ora supports the amenity and design outcomes being specifically referenced in the policy. Changes are sought to frame the issue being managed, which is ensuring positive design and living environments are provided as intensification increases.</p> <p>Amendments sought to delete the policy strand that seeks to encourage buildings to be planned to be compatible with possible future developments on neighbouring sites, as it creates ambiguity in consenting when possible future developments cannot be reasonably understood as part of the resource consenting process. This is also inconsistent with the height in relation boundary and setback standards.</p>	<p><i>Amendments sought</i></p> <p><a href="#">Encourage high density residential development that contributes positive design outcomes and living environments</a>  <a href="#">Manage the design of built development of more than three storeys and up to six storeys to achieve the best practicable outcomes for privacy, sunlight, and appearance including by:</a></p> <ul style="list-style-type: none"> <li>i. <a href="#">Encouraging buildings on front sites to be located close to the street,</a></li> <li>ii. <a href="#">Encouraging buildings to be planned to be compatible with possible future developments on neighbouring sites, including through the position of walls likely to be future common walls, accessways, communal open space and parking areas,</a></li> <li>iii. <a href="#">Encouraging the orientation of key windows and outdoor living spaces in</a></li> </ul>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><u>units to face toward the street and rear of the site, rather than the sides,</u></p> <p>iv. <u>Encouraging windows to be designed to minimise overlooking or looking into windows or outdoor living spaces of other close residential units,</u></p> <p>v. <u>Encouraging outdoor living spaces to achieve a good level of privacy by being screened from windows or outdoor living spaces of other close residential units,</u></p> <p>vi. <u>Encouraging outdoor living spaces to be located to achieve a good level of privacy and access to sunlight while minimising impacts on privacy and access to sunlight of other close residential units, and</u></p> <p>vii. <u>Encouraging the appearance of end wall and boundary treatments to take into account their proposed context, and the possible future context given the flexible options available on adjoining sites.</u></p>



ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
92.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.11	Oppose	Kāinga Ora seeks the deletion of this policy, as the matters it seeks to address and provide for are adequately covered by the Policies 4G 3.8 and 4G3.10 (as amended by Kāinga Ora)	<i>Amendments sought</i>  <del>Require the design of built development of over six storeys to achieve outcomes for privacy, sunlight, and appearance consistent with that of the best practicable outcomes for a development of six storeys.</del>
93.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.12	Support	Kāinga Ora supports this policy, which is required by schedule 3A of the Act.	<i>Retain as notified</i>
94.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.13	Support in part	Kāinga Ora generally supports the intent of this policy but seeks amendments to provide more flexibility through the resource consenting process.	<i>Amendments sought</i>  <del>Require rainwater tanks and design solutions and an appropriate provision minimum area of permeable surface in order to assist with the management of stormwater runoff created by development.</del>
95.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.14	Support	Kāinga Ora generally supports this policy.	<i>Retain as notified</i>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
96.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.15	Support	Kāinga Ora generally supports this policy.	<i>Retain as notified</i>
97.	Chapter 4G – High Density Residential Activity Area	Policy 4G 3.16	Oppose	Kāinga Ora opposes a restrictive height limit of 4 storeys applying in the HDRAA around Eastbourne, Stokes Valley and Wainuiomata. Kāinga Ora seeks deletion of this policy.	<i>Amendments sought</i>  <a href="#">Modify the general approach of the Activity Area in Eastbourne, Stokes Valley and Wainuiomata to enable buildings of up to four storeys, rather than six storeys, and achieve corresponding outcomes for amenity values including privacy, sunlight, and appearance.</a>
98.	Chapter 4G – High Density Residential Activity Area	Rules 4G 4.1.1 to 4G 4.1.7	Support	Kāinga Ora supports these activity based rules.	<i>Retain as notified</i>
99.	Chapter 4G – High Density Residential Activity Area	<a href="#">New Rule 4G 4.1.X</a>	<a href="#">NEW RULE</a>	Kāinga Ora seeks the introduction of a new rule to enable Community Gardens to operate as a permitted activity. Kāinga Ora notes that the creation of a new definition maybe required as a consequential change.	<i>New rule</i> <a href="#">Community Garden</a>  <a href="#">1. Activity status: Permitted</a>  Consequential changes, such as the introduction of a new definition, are also requested to give effect to this change.

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100.	Chapter 4G – High Density Residential Activity Area	<a href="#">New Rule 4G 4.1.XX</a>	<a href="#">NEW RULE</a>	<p>Kāinga Ora seeks a new rule to enable commercial activities on ground floor to be specifically enabled via a Restricted Discretionary Activity consent pathway, subject to meeting standards.</p> <p>This recognises that some service-related activities, such as convenience stores, hairdressers, and cafes have a role to play in enabling a well-functioning urban environment and enhancing vibrancy in walkable neighbourhoods. An example rule framework is provided. This rule framework is adequately provided for through Obj 4G 2.2 and Policy 4G 3.1.</p>	<p><i>New rule</i></p> <p><a href="#">Commercial Activity</a></p> <p><a href="#">1. Activity status: Restricted Discretionary</a></p> <p><a href="#">Where:</a></p> <ol style="list-style-type: none"> <li>a. <a href="#">The commercial activity is limited to the ground floor tenancy of an apartment building;</a></li> <li>b. <a href="#">The total gross floor area of commercial activity does not exceed 200m<sup>2</sup>;</a></li> <li>c. <a href="#">The commercial activity does not include the repair, alteration, restoration or maintenance of motor vehicles.</a></li> <li>d. <a href="#">The hours of operation are between:</a> <ol style="list-style-type: none"> <li>i. <a href="#">7.00am and 9.00pm Monday to Friday; and</a></li> <li>ii. <a href="#">8.00am and 7.00pm Saturday, Sunday and public holidays.</a></li> </ol> </li> </ol> <p><a href="#">Matters of discretion are restricted to:</a></p> <ol style="list-style-type: none"> <li>1. <a href="#">The effects on the amenity of the surrounding residential area.</a></li> <li>2. <a href="#">The effects on pedestrian safety and the safe and efficient movement of vehicles.</a></li> </ol>

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					<p>3. <a href="#">The activity contributes positively to the urban environment and achieves attractive and safe streets.</a></p> <p>2. <a href="#">Activity status: Discretionary</a></p> <p>Where:</p> <p>a. <a href="#">Compliance is not achieved with 4G 4.1XX-1.a - 4G 4.1XX -1.d.</a></p>
101.	Chapter 4G – High Density Residential Activity Area	Rules 4G 4.1.8 to 4G 4.1.10	Support	Kāinga Ora supports these rules.	<i>Retain as notified</i>
102.	Chapter 4G – High Density Residential Activity Area	Rule 4G 4.11 Vegetation Removal	Oppose	Kāinga Ora opposes the proposed changes to this rule and seeks the retention of the existing rule. Kāinga Ora considers the proposed rule to be too broad sweeping and may constrain the supply of housing. The District Plan already requires minimum onsite landscaping in this zone, and Notable Trees are protected elsewhere in the Plan. Kāinga Ora acknowledges that the Council must give effect to higher order planning documents in the identification and protection of	<i>Amendments sought</i>  <i>Replace with:</i>  <a href="#">The removal of vegetation (whether indigenous or exotic) is a permitted activity.</a>

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				indigenous biodiversity but considers the rule, as proposed, is inappropriate.	
103.	Chapter 4G – High Density Residential Activity Area  (Rules)  4G 4.2 Development Standards	Rule 4G 4.2.1 Number of Residential Units per Site	Support in part	<p>Kāinga Ora generally supports this rule but seeks changes to the maximum number of permitted units from 3 to 6, recognising that the HDRAA is an area that is explicitly enabling more intensive development.</p> <p>Kāinga Ora also seeks revisions to the matters of discretion.</p>	<p><i>Amendments sought</i></p> <p><b><u>Rule 4G 4.2.1 - Number of Residential Units Dwellings per Site</u></b></p> <ol style="list-style-type: none"> <li>1. <a href="#">No more than six residential units occupy the site; and</a></li> <li>2. <a href="#">Compliance with the following standards is achieved:</a> <ol style="list-style-type: none"> <li>i. <a href="#">4G 4.2.2 - building coverage</a></li> <li>ii. <a href="#">4G 4.2.3 – building height;</a></li> <li>iii. <a href="#">4G 4.2.4 – HIRTB;</a></li> <li>iv. <a href="#">4G 4.2.5 –only in relation to the rear/side yard boundary setback</a></li> <li>v. <a href="#">4G 4.2.13 – outlook space</a></li> </ol> </li> </ol> <p><b><u>Activity status: Restricted discretionary</u></b> <b><u>Where:</u></b></p> <ol style="list-style-type: none"> <li>a. <a href="#">Compliance is not achieved with 4G 4.2.1(1):</a></li> </ol> <p><b><u>Matters of discretion are restricted to:</u></b></p> <ol style="list-style-type: none"> <li>1. <a href="#">The scale, form, and appearance of the development is compatible with the</a></li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><a href="#">planned urban built form of the neighbourhood;</a></p> <p>2. <a href="#">The development contributes to a safe and attractive public realm and streetscape;</a></p> <p>3. <a href="#">The extent and effects on the three waters infrastructure, achieved by demonstrating that at the point of connection the infrastructure has the capacity to service the development; and</a></p> <p>4. <a href="#">The degree to which the development delivers quality on-site amenity and occupant privacy that is appropriate for its scale.</a></p> <p><b><a href="#">Activity status: Restricted discretionary</a></b>  <b><a href="#">Where:</a></b></p> <p>b. <a href="#">Compliance is not achieved with 4G 4.2.1(2).</a></p> <p><b><a href="#">Matters of discretion are restricted to:</a></b></p> <p>1. <a href="#">The extent and effect of non-compliance with any relevant standard as specified in the associated assessment criteria for the infringed standard.</a></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><b><u>Notification:</u></b></p> <ol style="list-style-type: none"> <li>1. <u>An application for resource consent which complies with 4G 4.2.1(1) but does not comply with 4G 4.2.1(2) is precluded from being publicly notified.</u></li> <li>2. <u>An application for resource consent made which does not comply with 4G 4.2.1(1) but complies with 4G 4.2.1(2) is precluded from being either publicly or limited notified.</u></li> <li>3. <u>An application for resource consent made which does not comply with 4G 4.2.1(1) and 4G 4.2.1(2) but complies 4G 4.2.3 – building height and 4G 4.2.1 - building coverage is precluded from being either publicly or limited notified.</u></li> </ol> <p><u>(a) Up to three residential units per site are a <b>permitted</b> activity.</u></p> <p><u>(b) Four or more residential units per site are a <b>restricted discretionary activity</b>.</u></p> <p><b><u>Discretion is restricted to:</u></b></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><del>(i) The planned urban built character for the High-Density Residential Activity Area.</del></p> <p><del>(ii) The matters in Policies 4G 3.5, and 4G.12.</del></p> <p><del>(iii) The matters in Policies 4G 3.10 and 4G 3.11, if the development is four or more storeys.</del></p> <p><del>(iv) The on-site amenity for future occupants of the development.</del></p> <p><del>(v) The capacity of the network infrastructure for water supply, wastewater, stormwater and land transport to service the proposed development.</del></p> <p><del>(vi) Any positive effects, including positive effects of increasing housing capacity and variety.</del></p> <p><del>(vi) The following design elements:</del></p> <ol style="list-style-type: none"> <li><del>1. Building height</del></li> <li><del>2. Recession planes and setbacks</del></li> <li><del>3. Indoor and outdoor living spaces</del></li> <li><del>4. Open space and boundary treatments</del></li> <li><del>5. Entrances, carparking and garages</del></li> <li><del>6. Onsite stormwater management</del></li> <li><del>7. End / side wall treatment</del></li> </ol>



ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p>8. Building materials  9. Bike parking, storage and service areas  10. Privacy and safety  11. Landscaping</p> <p><u>When considering the matters in (vii), the Council will be principally guided by its Medium Density Design Guide.</u></p> <p><u>Public and limited notification is precluded for resource consent applications under Rule 4G 4.2.1 (b).</u></p>
104.	Chapter 4G – High Density Residential Activity Area  (Rules)  4G 4.2 Development Standards	Rule 4G 4.2.2 Building Coverage	Support in part	<p>Kāinga Ora supports the Restricted Discretionary activity status of this rule where the permitted standard is not complied with.</p> <p>Kāinga Ora seeks removal of the note, which advises that the (non-statutory) design guide will be used as a tool to assess the effects of a proposal that exceeds this density standard. Assessment of site coverage breaches are at the lower end of consenting complexity and do</p>	<p><i>Amendments sought</i></p> <p>...</p> <p><b><u>Discretion is restricted to:</u></b></p> <p>(i) <u>The planned urban built character for the High Density Residential Activity Area including the requirements to enable buildings of at least six storeys within the High Density Residential Activity Area.</u></p> <p>(ii) <u>The effects on the privacy of adjoining sites.</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>not require a qualitative assessment against a design guide.</p> <p>Kāinga Ora supports the preclusion of public notification for any breach to this rule.</p>	<p><u>(iii) The effects on the amenity of the surrounding residential area, the streetscape and adjoining public space.</u></p> <p><del>Note: When addressing or assessing potential effects in relation to matters (i) and (ii) above, applicants and the Council can be informed by the relevant outcomes identified in the Medium Density Design Guide.</del></p> <p><u>Public notification is precluded for resource consent applications under Rule 4G 4.2.2(b).</u></p>
105.	<p>Chapter 4G – High Density Residential Activity Area</p> <p>(Rules)</p> <p>4G 4.2 Development Standards</p>	<p>Rule 4G 4.2.3</p> <p>Building height</p>	<p>Support in part</p>	<p>Kāinga Ora generally supports the maximum permitted height standard.</p> <p>As noted elsewhere in the submission, Kāinga Ora opposes the four-storey height limit proposed around the centres of Wainuiomata, Eastbourne and Stokes Valley and instead seeks that the residential areas surrounding these centres are zoned MDRAA and subject to a height control overlay within that zone.</p>	<p><i>Amendments sought</i></p> <p><u>(a) Construction or alteration of a building is a permitted activity if:</u></p> <ul style="list-style-type: none"> <li>a. <u>The building is within a specific height control overlay shown on the District Plan map and does not exceed the maximum height shown for that overlay, or</u></li> <li>b. <u>In any other case, the building does not exceed a maximum height of 22m.</u></li> </ul> <p>...</p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>In addition, Kāinga Ora is seeking additional height (around the city centre and Petone Commercial Activity Area, Naenae and Waterloo).</p> <p>The proposed rule framework in the plan change is supported in part on the basis that it provides for the application of such an approach. It is on this basis that Kāinga Ora supports clause 4F 4.2.2(a)(i).</p> <p>Kāinga Ora supports the Restricted Discretionary activity status of this rule where the permitted standard is not complied with.</p> <p>Kāinga Ora seeks simplification of the prescribed matters of discretion, and therefore seeks the deletion of the strand relating to the listed “design elements”. These matters are adequately addressed either within the remaining matters of</p>	<p><b><u>(b) Construction or alteration of a building that does not comply with Rule 4G 4.2.3(a) is a restricted discretionary activity.</u></b></p> <p><b>Discretion is restricted to:</b></p> <ul style="list-style-type: none"> <li><b><u>(i) The planned urban built character for the High Density Residential Activity Area including the requirements to enable buildings of at least six storeys within the High Density Residential Activity Area.</u></b></li> <li><b><u>(ii) The effects on the amenity of the surrounding residential area and adjoining streetscape.</u></b></li> <li><b><u>(iii) The effects on the privacy of adjoining sites.</u></b></li> <li><b><u>(iv) The effects on shading of adjoining sites including the impacts of shading on their primary internal and external living areas throughout the year.</u></b></li> <li><b><u>(v) The effects of shading and additional building bulk on any public open space or recreational grounds and their ability to provide outdoor amenity to users.</u></b></li> </ul>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>discretion, and/or by other density standards.</p> <p>Kāinga Ora supports the preclusion of public notification for any breach to this rule.</p>	<p><u>(vi) Any design features or articulation to reduce the bulk of the building when viewed from neighbouring properties.</u></p> <p><u>(vii) The following design elements:</u></p> <ol style="list-style-type: none"> <li><u>1. Building height</u></li> <li><u>2. End / side wall treatment</u></li> <li><u>3. Building materials</u></li> <li><u>4. Privacy and safety</u></li> <li><u>5. Landscaping</u></li> </ol> <p><u>When considering the design outcomes of the development matters in (vii), the Council will be principally guided by its Medium Density Design Guide.</u></p> <p><u>Public notification is precluded for resource consent applications under Rule 4G 4.2.3(b).</u></p>
106.	Chapter 4G – High Density Residential Activity Area  (Rules)  4G 4.2 Development Standards	Rule 4G 4.2.4 Height in relation to boundary	Oppose	Kāinga Ora seeks an amended standard that provides for a more flexible HIRB in the HDRAA. Kāinga Ora notes that the 4m + 60° is a medium density standard, which does not enable the more intensive built form anticipated in a high density context.	<p><i>Amendments sought</i></p> <p><u>(a) Construction or alteration of a building is a permitted activity if the following maximum height in relation to boundary requirements are being met:</u></p> <ol style="list-style-type: none"> <li>a. <u>4m 19m + 60° along the first 22m of the side boundary as measured from the road frontage</u></li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>Kāinga Ora supports the Restricted Discretionary activity status of this rule where the permitted standard is not complied with.</p> <p>Additional exclusions are sought from which the HIRB applies.</p> <p>Kāinga Ora seeks simplification of the prescribed matters of discretion, and therefore seeks the deletion of the strand relating to the listed “design elements”. These matters are adequately addressed either within the remaining matters of discretion, and/or by other density standards or relevant policies.</p> <p>Kāinga Ora also seeks removal of the note, which advises that the (non-statutory) design guide will be used as a tool to assess the effects of a proposal that exceeds this density standard. A breach of this nature does not warrant a qualitative assessment against a design guide.</p>	<p>b. <u>8m + 60° from all other side and rear boundaries</u></p> <p>c. <u>Except no part of any building or structure may project beyond a 60° recession plane measured from a point 4m vertically above ground level along any boundary that adjoins a site in the Medium Density Residential Activity Area.</u></p> <p><u>Where the boundary forms part of a legal right of way, entrance strip, access site, or pedestrian access way, the height in relation to boundary applies from the farthest boundary of that legal right of way, entrance strip, access site, or pedestrian access way.</u></p> <p><u>This standard does not apply to:</u></p> <ul style="list-style-type: none"> <li><u>(a) A boundary with a road,</u></li> <li><u>(b) Existing or proposed internal boundaries within a site, and</u></li> <li><u>(c) Site boundaries where there is an existing common wall between two buildings on adjacent sites or where a common wall is proposed.</u></li> </ul>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>Kāinga Ora supports the preclusion of public notification for any breach to this rule.</p>	<p>(d) <u>Boundaries adjoining the City Centre Zone, Metropolitan Centre Zone, [all relevant commercial zones];</u></p> <p>(e) <u>Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height in relation to boundary by more than 1m;</u></p> <p>(f) <u>Antennas, aerials, satellite dishes (less than 1m in diameter), flues, and architectural features (e.g., finials, spires) provided these do not exceed the height in relation to boundary by more than 3m measured vertically</u></p> <p>(b) <u>Construction or alteration of a building that does not meet the maximum height in relation to boundary requirements is a restricted discretionary activity.</u></p> <p><b><u>Discretion is restricted to:</u></b></p> <p>a. <u>The planned urban built character for the High Density Residential Activity Area, including the requirements to enable buildings of at least six storeys</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><u>within the High Density Residential Activity Area.</u></p> <p>b. <u>The effects on the privacy of adjoining sites.</u></p> <p>c. <u>The effects on shading of adjoining sites, including the impacts of shading on their primary internal and external living areas.</u></p> <p>d. <u>The effects on the amenity of the surrounding residential area and adjoining streetscape.</u></p> <p>e. <u>The level of additional building bulk and the impact on the amenity of the adjoining residential properties.</u></p> <p>f. <u>The following design elements:</u></p> <ol style="list-style-type: none"> <li><u>1. Building height</u></li> <li><u>2. Recession Planes</u></li> <li><u>3. End / side wall treatment</u></li> <li><u>4. Privacy and safety</u></li> </ol> <p><u>Note: When addressing or assessing potential effects in relation to matters (i) and (vi) above, applicants and the Council can be informed by the relevant outcomes identified in the Medium Density Design Guide.</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<u>Public notification is precluded for resource consent applications under Rule 4G 4.2.4(b).</u>
107.	Chapter 4G – High Density Residential Activity Area  (Rules)  4G 4.2 Development Standards	Rule 4G 4.2.5  Setbacks	Support in part	<p>Kāinga Ora generally supports the setbacks standard as they relate to side and rear yards. However, Kāinga Ora seeks removal of the front yard setback given a high density zone has a more urbanised character of a high density zone. Other adjustments are sought, to make the rule more effective.</p> <p>Kāinga Ora seeks simplification of the prescribed matters of discretion, and therefore seeks the deletion of the strand relating to the listed “design elements”. These matters are adequately addressed either within the remaining matters of discretion, and/or by other density standards.</p> <p>Kāinga Ora also seeks removal of the note, which advises that the (non-statutory) design guide will be used</p>	<p><i>Amendments sought</i></p> <p>(a) <u>Construction or alteration of a building is a permitted activity if:</u></p> <p><u>(i) Buildings are set back from the relevant boundary by the minimum depth listed below:</u></p> <p><u>Front yard: 1.5m</u>  <u>Side yard: 1m</u>  <u>Rear yard: 1m (excluded on corner sites)</u></p> <p><u>This standard does not apply to site boundaries where there is an existing common wall between 2 buildings on adjacent sites or where a common wall is proposed.</u>  <u>Eaves may encroach into any yard by up to 0.6m.</u></p>



ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>as a tool to assess the effects of a proposal that exceeds this density standard. Assessment setbacks are at the lower end of consenting complexity and do not require a qualitative assessment against a design guide.</p> <p>Kāinga Ora supports the preclusion of public notification for any breach to this rule. If the front yard setback is not removed, Kāinga Ora seeks a preclusion to limited notification to apply to this aspect of a breach.</p>	<p>(b) <u>Construction or alteration of a building that does not meet the setback requirements is a restricted discretionary activity.</u></p> <p><b>Discretion is restricted to:</b></p> <ul style="list-style-type: none"> <li>(i) <u>The planned urban built character for the High Density Residential Activity Area, including the requirements to enable buildings of at least six storeys within the High Density Residential Activity Area.</u></li> <li>(ii) <u>The effects on the privacy of adjoining sites.</u></li> <li>(iii) <u>The effects on the amenity of the surrounding residential area, the streetscape and adjoining public space.</u></li> <li>(iv) <u>The effect from any building bulk and its proximity to the main internal and external living areas of adjoining residential properties</u></li> <li>(v) <u>The effects on the amenity of the surrounding residential area, the streetscape and adjoining public space.</u></li> <li>(vi) <u>The following design elements:</u></li> </ul>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><a href="#">1. Building height</a>  <a href="#">2. Recession planes</a>  <a href="#">3. End / side wall treatment</a>  <a href="#">4. Privacy and safety</a></p> <p><a href="#">Note: When addressing or assessing potential effects in relation to matters (i) and (vi) above, applicants and the Council can be informed by the relevant outcomes identified in the Medium Density Design Guide.</a></p> <p><a href="#">Public notification is precluded for resource consent applications under Rule 4G 4.2.5(b).</a></p>
108.	Chapter 4G – High Density Residential Activity Area (Rules)  4G 4.2 Development Standards	Rule 4G 4.2.6  Height in Relation to Boundary and Setbacks for Sites Abutting Marae in the Community Iwi Activity Area	Support	Kāinga Ora generally supports this rule framework, noting that the more restrictive HIRB and setbacks are only applicable to sites directly abutting a marae in the Community Iwi Activity Area.	<i>Retain as notified.</i>
109.	Chapter 4G – High Density Residential Activity Area	Rule 4G 4.2.7  Permeable Surface	Oppose	Kāinga Ora opposes the introduction of permeable surfaces within the HDRAA and considers that the	<i>Delete the rule in its entirety.</i>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
	(Rules) 4G 4.2 Development Standards			Landscaped Areas rule provides adequate control.	
110.	Chapter 4G – High Density Residential Activity Area  (Rules) 4G 4.2 Development Standards	Rule 4G 4.2.8  Outdoor Living Space	Oppose	<p>Kāinga Ora seeks amendments to enable flexibility to provision of open space within the more intensive high density zone. Changes sought are provided.</p> <p>Kāinga Ora seeks the removal of the note referencing assessment being made against the design guide for this rule.</p> <p>Kāinga Ora seeks the preclusion of limited notification for any breach to this rule.</p>	<p><i>Amendments sought</i></p> <ol style="list-style-type: none"> <li>1. Replace standard with alternative better suited to high density development [see below]</li> <li>2. Remove reference to assessment being made against the design guide</li> <li>3. Expand notification preclusion clause to also apply to limited notification.</li> </ol> <p><b><u>Replacement standard</u></b></p> <ol style="list-style-type: none"> <li>1. <u>Each residential unit must be provided with either a private outdoor living space or access to a communal outdoor living space;</u></li> <li>2. <u>Where private outdoor living space is provided it must be:</u> <ol style="list-style-type: none"> <li>a. <u>For the exclusive use of residents;</u></li> <li>b. <u>Directly accessible from a habitable room;</u></li> </ol> </li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p>c. <u>A single contiguous space; and</u></p> <p>d. <u>Of a minimum area and dimension as follows</u></p> <p>i. <u>Studio/1 bdrm - 5m<sup>2</sup> and 1.8m</u></p> <p>ii. <u>2+ bdrm – 8m<sup>2</sup> and 1.8m</u></p> <p>3. <u>Where communal outdoor living space is provided it does not need to be in a single continuous space, but it must be:</u></p> <p>a. <u>Accessible from the residential units it serves;</u></p> <p>b. <u>A minimum area of 10m<sup>2</sup> for every 5 units that it serves and a minimum dimension of 8m; and</u></p> <p>c. <u>Free of buildings, parking spaces, and servicing and manoeuvring areas.</u></p> <p><b><u>Discretion is restricted to:</u></b>  <u>The extent to which:</u></p> <p>1. <u>Any proposed outdoor living space provides a good standard of amenity relative to the number of occupants the space is designed for;</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<ol style="list-style-type: none"> <li>2. <a href="#">Other on-site factors compensate for a reduction in the size or dimension of the outdoor living space; and</a></li> <li>3. <a href="#">The availability of public open space in proximity to the site.</a></li> </ol>
111.	Chapter 4G – High Density Residential Activity Area  (Rules)  4G 4.2 Development Standards	Rule 4G 4.2.9  Accessory Building	Support in part	<p>Kāinga Ora supports this rule.</p> <p>Kāinga Ora seeks the introduction of a notification preclusion for public notification.</p>	<p><i>Amendments sought</i></p> <p>Introduce:</p> <ol style="list-style-type: none"> <li>1. Preclusion clause for public notification.</li> </ol>
112.	Chapter 4G – High Density Residential Activity Area  (Rules)  4G 4.2 Development Standards	Rule 4G 4.2.10  Screening and storage	Support in part	<p>Kāinga Ora seeks the removal of 4G 4.2.10(b)(v) (list of design elements) in its entirety along with the removal of the note referencing assessment being made against the design guide for this rule.</p>	<p><i>Amendments sought</i></p> <p>Delete:</p> <ol style="list-style-type: none"> <li>1. 4G 4.2.10(b)(v) (list of design elements)</li> <li>2. Reference to assessment being made against the design guide</li> </ol>
113.	Chapter 4G – High Density Residential Activity Area	Rule 4G 4.2.11  Demolition	Support	<p>Kāinga Ora supports the permitted activity status for demolition of buildings.</p>	<p><i>Retain as notified</i></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
	(Rules) 4G 4.2 Development Standards				
114.	Chapter 4G – High Density Residential Activity Area  (Rules)  4G 4.2 Development Standards	Rule 4G 4.2.12  Stormwater Retention	Support	Kāinga Ora supports measures to implement onsite hydraulic neutrality.	<i>Retain as notified.</i>
115.	Chapter 4G – High Density Residential Activity Area  (Rules)  4G 4.2 Development Standards (Rules)	Rule 4G 4.2.13  Outlook Space (per unit)	Support in part	Kāinga Ora supports this rule, but also seeks the preclusion of limited notification for any breach of this rule. Kāinga Ora also seeks the removal of the note referencing assessment being made against the design guide for a breach to this rule.	<i>Amendments sought</i>  Delete: 1. Reference to assessment being made against the design guide  Introduce: 2. Preclusion clause for limited notification.
116.	Chapter 4G – High Density Residential Activity Area	Rule 4G 4.2.14  Windows to Street	Support in part	Kāinga Ora generally supports the windows to street standard, which is consistent with the MDRS.	<i>Amendments sought</i>  Delete:

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
	(Rules)  4G 4.2 Development Standards (Rules)			<p>However, Kāinga Ora seeks the removal of 4G 4.2.14 (b)(iii) (list of design elements) in its entirety along with the removal of the note referencing assessment being made against the design guide for this rule.</p> <p>Kāinga Ora seeks the preclusion of limited notification for any breach to this rule.</p>	<ol style="list-style-type: none"> <li>1. 4G 4.2.14(b)(iii) (list of design elements)</li> <li>2. Reference to assessment being made against the design guide</li> </ol> <p>Introduce:</p> <ol style="list-style-type: none"> <li>1. Preclusion clause for limited notification.</li> </ol>
117.	Chapter 4G – High Density Residential Activity Area  (Rules)  4G 4.2 Development Standards	Rule 4F 4.2.13  Landscaped Area	Support in part	<p>Kāinga Ora generally supports the landscaped area standard, which is consistent with the MDRS.</p> <p>However, Kāinga Ora seeks the removal of 4G 4.2.15 (b)(viii) (list of design elements) in its entirety along with the removal of the note referencing assessment being made against the design guide for this rule. Kāinga Ora seeks the preclusion of limited notification for any breach to this rule.</p>	<p><i>Amendments sought</i></p> <p>Delete:</p> <ol style="list-style-type: none"> <li>1. 4G 4.2.15(b)(viii) (list of design elements)</li> <li>2. Reference to assessment being made against the design guide</li> </ol> <p>Introduce:</p> <ol style="list-style-type: none"> <li>3. Preclusion clause for limited notification.</li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
118.	Chapter 4G 5 – Precincts and Schedules Sites	4G 5.2 Residential Heritage Precinct	Opposes in part	<p>Kāinga Ora is opposes (in part) of Council proposed heritage areas. Kāinga Ora has commissioned a heritage assessment which has concluded that there are a number of proposed landholdings/buildings that have little heritage value, largely due to modifications that have significantly altered heritage and architectural values. Accordingly, Kāinga Ora seeks the following amendments to the proposed Petone State Flats Heritage Area.</p> <ol style="list-style-type: none"> <li>1. Change title of the heritage area to: “Petone State Housing Area”</li> <li>2. Change to the boundary of the proposed heritage area to exclude landholdings/buildings that (a) retain little heritage value due to modifications and (b) are considered not to contribute to the proposed housing area – reasons noted below.</li> </ol>	<p><i>Amendments sought</i></p> <p>Kāinga Ora seeks the following changes:</p> <ol style="list-style-type: none"> <li>1. Change to the boundary of the proposed heritage area HA-09 to exclude landholdings/buildings that (a) retain little heritage value due to modifications and (b) are considered not to contribute to the proposed housing area (consistent with the amendments shown on the map attached at Appendix 2).</li> <li>2. Change the title of heritage area HA-09 to: Petone State <del>Flats</del> <a href="#">Housing</a> Area</li> <li>3. Change the provisions to an overlay instead of a precinct in the Plan.</li> <li>4. Relocate provisions and rules to a District wide chapter, rather than being located within the residential chapters, with all relevant consequential changes.</li> <li>5. Kāinga Ora seeks the exclusion of 2-6 East St. and 82 Adelaide St.</li> </ol>



ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>3. Kāinga Ora seeks the exclusion of 2-6 East St. and 82 Adelaide St., largely due to:</p> <ul style="list-style-type: none"> <li>○ Lost contextual value due to the demolition of 2 of the 4 original blocks, grouped around open space</li> <li>○ Modifications to the multi-unit flats has affected the heritage values;</li> <li>○ Both multi-unit buildings are not considered to be the best representation of the modernist style multi-unit flats (as compared to 28 Scholefield St, and 1-20 Scholefield St)</li> </ul> <p>4. Kāinga Ora seeks the exclusion of the star-flats at 80 Adelaide St., largely due to:</p> <ul style="list-style-type: none"> <li>○ Extensively remodelled, original distinctive architectural forms have been lost</li> </ul>	<p>6. Kāinga Ora seeks the exclusion of the star-flats at 80 Adelaide St.</p> <p>7. Kāinga Ora seeks the exclusion of 81-89 Adelaide St.</p> <p>8. Consequential amendments may be required to give effect to this submission and relief/s sought.</p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<ul style="list-style-type: none"> <li>○ Unsympathetic modifications, particularly to the roof form, significantly affect the architectural and heritage values</li> <li>○ Most distinctive feature of the star-flat typology is the original butterfly roof</li> </ul> <p>5. Kāinga Ora seeks the exclusion of 81-89 Adelaide St, largely due to:</p> <ul style="list-style-type: none"> <li>○ Modifications have resulted in the dwellings having little heritage value, specifically:</li> <li>○ Changes to the roof form</li> <li>○ Additions to the primary facades, including awnings</li> <li>○ Lack of Modernist influences that shaped other similar dwellings along Jackson St.</li> </ul>	

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>Kāinga Ora also considers that qualifying matters should be identified as overlays and addressed as district-wide provisions, rather than precincts within zone based chapters. On this basis, Kāinga Ora requests that identified areas with recognised significant heritage values are managed and addressed with appropriate provisions and rules within a Heritage Chapter, in accordance with the National Planning Standards.</p> <p>Kāinga Ora questions the presence of a permitted activity status for the demolition of buildings, as this would result in the potential loss of heritage buildings within the interim period that Council undertakes a plan change to review and strengthen the heritage provisions.</p>	
<b>Chapter 5 - Commercial</b>					
119.	Commercial	Centres hierarchy	Oppose	Kāinga Ora generally supports the approach to implement the NPS-UD and Enabling Housing Supply	<ol style="list-style-type: none"> <li>1. Review the Centres hierarchy and commercial and residential intensification provisions in the</li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>Amendment Act by incorporating intensification provisions into PC56. However, Kāinga Ora notes that a review of the centres hierarchy and accompanying zone framework has not been undertaken to support this at a strategic level.</p> <p>The Kāinga Ora submission as a whole seeks improvements to better align with national direction and achieve regional consistency with this direction. Consequently, a review of the centres hierarchy and accompanying framework to support intensification is considered necessary.</p> <p>Kāinga Ora notes, through a review of the s32 reporting, that Council intends to comprehensively review and replace the commercial chapters in the ongoing full District Plan review.</p> <p>In the event that this is not the intention, Kāinga Ora's seeks a</p>	<p>Commercial (Centres) and Mixed-Use zones to improve national and regional consistency and increase density and heights across the board.</p> <ol style="list-style-type: none"> <li>2. Expand Centre Zoning and residential intensification standards to reflect an increase in intensification anticipated in and around centres and rapid transit stops, and where necessary introduce new chapters.</li> <li>3. The revised centres hierarchy would then translate into an updated centres zoning framework, with clear objectives in each zone stating the intended role and purpose and articulating the planned built urban environment for each zone.</li> <li>4. Undertake any consequential changes necessary across Plan Change 56 to address the matters raised above.</li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>comprehensive review of the centres hierarchy to better align with national direction and achieve regional consistency.</p> <p>Kāinga Ora considers in such a review of the centre's hierarchy, that the following centres should be considered for implementation across Hutt City, consistent with the wider region.</p> <ul style="list-style-type: none"> <li>• City Centre</li> <li>• Metropolitan Centre</li> <li>• Town Centre</li> <li>• Local Centre</li> <li>• Neighbourhood Centre</li> <li>• Mixed Use</li> <li>• General Industrial</li> </ul>	
120.	Chapter 5 Commercial	Introduction	Support in part	Kāinga Ora generally supports the amendments made to the introduction of the overarching Commercial Chapter, and the rationalisation of centres from five to three, recognising the scope of the plan change and in the absence	<p><i>Amendments sought:</i></p> <p>(e) Suburban Mixed Use Activity Area</p> <p>The Mixed Use Activity Area provides for the local convenience needs of surrounding residents such as <u>community activities</u>, local retail, commercial services and offices. It also</p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>of a centre's hierarchy review being undertaken.</p> <p>Kāinga Ora seeks minor amendments to the description of the Suburban Mixed Use Activity Area to more clearly describe the intensification that is enabled in this zone.</p>	<p>provides for residential use above ground floor. The area provides for moderate intensification and greater development capacity for the types of housing likely to be demanded in the future.</p>
121.	Chapter 5A Central Commercial Activity Area	Policy of 5A 1.1.1 Capacity of the Central Commercial Activity Area	Support	Kāinga Ora supports the revisions to the policy to enable a greater intensity of development more explicitly.	<i>Retain as notified</i>
122.	Chapter 5A Central Commercial Activity Area	Explanation and Reasons of section 5A 1.1.1 Capacity of the Central Commercial Activity Area	Support in part	<p>Kāinga Ora generally supports the revisions to the explanation and reasons section, but opposes design guides being located within the District Plan, and therefore seeks deletion of the statement referencing the Central Commercial Design Guide. This is consistent with the notified Residential Chapters, where Design Guides sit outside of the District Plan.</p> <p>Kāinga Ora also notes that rules and standards relevant to the precincts</p>	<p><i>Amendments sought</i></p> <p><del>The Central Commercial Design Guide identifies five subareas or precincts which have specific issues and values. These precincts are entitled Core, Commercial, Riverfront (Core), Riverfront (Commercial) and Residential Transition, and have different design principles and assessment guidelines applying to the respective precincts.</del></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				have been removed as part of the Plan Change, which provides further reason to delete this statement.	
123.	Chapter 5A Central Commercial Activity Area	Explanation and Reasons of section 5A.1.1.4 Incompatibility between Different Activities	Support in part	<p>Kāinga Ora supports the revisions to the policy to enable a greater intensity of residential development more explicitly within the city centre.</p> <p>Kāinga Ora seeks amendments to final paragraph of the statement that refers to the incompatibility of residential activities with other activities.</p>	<p><i>Amendments sought.</i></p> <p>...</p> <p>However, residential activities may be <del>incompatible</del> <a href="#">sensitive to effects generated by other</a> <del>with some other</del> activities in the Central Commercial Activity Area, in particular, they may be sensitive to noise from other activities. Rather than overly restricting other activities, it is appropriate that the residential activities mitigate this sensitivity by providing <del>for external</del> <a href="#">appropriate</a> noise insulation.</p>
124.	Chapter 5A Central Commercial Activity Area	Policies of section 5A 1.2.1 Quality of Buildings and Open Spaces	Support	Kāinga Ora supports the revisions to the policy to enable a greater intensity of development more explicitly within the city centre.	<i>Retain as notified</i>
125.	Chapter 5A Central Commercial Activity Area	Explanation and Reasons of section 5A 1.2.1 Quality of Buildings and Open Spaces	Support	Kāinga Ora supports the revisions to the policy to enable a greater intensity of development more explicitly within the city centre.	<i>Retain as notified</i>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
126.	Chapter 5A Central Commercial Activity Area	Objective of section 5A.1.2.3 Adjoining Residential Areas	Oppose in part	<p>Kāinga Ora accepts the intent of managing zone interface effects but opposes the objective in its proposed form. Intensive development within the city centre is explicitly encouraged; however, the objective as proposed could require any development in the city centre to be consistent with the amenity values of surrounding residential areas. This places an undue constraint on the ability to intensify the city centre. Kāinga Ora considers that the height in relation to boundary standards are appropriate to manage amenity values of adjacent residential neighbourhoods, but the rest of the planning framework should seek to maximise the benefits of intensification.</p> <p>Amendments sought.</p>	<p><i>Amendments sought.</i></p> <p><del>Built development is consistent with the amenity values expected in the planned urban environment of adjoining residential areas.</del></p> <p><u>Built development adjoining residential areas minimises adverse effects on the amenity values of adjacent sites in Residential Zones, taking into account the planned urban built environment of the central commercial activity area.</u></p>



ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
127.	Chapter 5A Central Commercial Activity Area	Policy of section 5A.1.2.3 Adjoining Residential Areas	Oppose in part	Kāinga Ora supports the intent to simplify the policy, but opposes the proposed wording and seeks a replacement policy that more clearly articulates the intended management of zone interface effects.	<p><i>Amendments sought.</i></p> <p><del>a) Manage the effects of buildings and development in the Central Commercial Activity Area to ensure any adverse effects on the amenity values of the nearby residential areas are avoided, remedied or mitigated.</del></p> <p><u>Minimise the adverse effects from development and activities directly adjoining sites within adjacent residential areas by ensuring that:</u></p> <ol style="list-style-type: none"> <li>1. <u>Buildings are located and designed to achieve a transition at the zone interface;</u></li> <li>2. <u>Buildings are located and designed to minimise shading and privacy effects;</u></li> <li>3. <u>Activities at the zone interface are compatible with adjacent residential use; and</u></li> <li>4. <u>Screening and landscaping minimise adverse visual effects</u></li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
128.	Chapter 5A Central Commercial Activity Area	Explanation and Reasons of section 5A 1.2.3	Support in part	Kāinga Ora supports the intent of this statement. Changes are sought to remove reference to “safeguard” and “protect” in the context of providing for residential amenity, as amenity will change as the planned urban built form is established. Revisions are sought to articulate more clearly that zone interface effects are to be appropriately managed to provide for residential amenity, which is primarily achieved through the HIRB control and existing activity based controls at the zone interface.	<p><i>Amendments sought</i></p> <p>The Central Commercial Activity Area shares an extensive interface with adjacent Residential Activity Areas. This interface is a particularly sensitive one as the effects associated with commercial activities and <u>the scale of</u> development have the ability to adversely impact on the use and enjoyment of neighbouring residential areas. Given the extent of this interface, <u>and</u> the relatively unrestricted range of activities permitted within the Central Commercial Activity Area, <u>and the planned built form of the area</u>, the District Plan seeks to ensure that <del>adequate safeguards</del> mitigating controls are put in place to <del>protect</del> provide for residential amenity <u>at the zone interface</u>. These <del>safeguards include</del> measures <del>to include</del> controlling the effects of new buildings and development and larger additions to existing buildings, on adjacent residential areas, such as building height <u>and location in relation to the boundary, and location, building bulk, appearance, character,</u> landscaping and screening, access, servicing, signage and lighting.</p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
129.	Chapter 5A Central Commercial Activity Area	Chapter 5A Central Commercial Activity Area (Rules) <ul style="list-style-type: none"> <li>• 5A 2.1.1(a)</li> <li>• 5A 2.1.1(b)</li> <li>• 5A 2.1.1(g)</li> <li>• 5A 2.1.1(h)</li> <li>• 5A 2.1.1(k)</li> <li>• 5A 2.2(b)</li> <li>• 5A 2.2.1(b)</li> <li>• 5A 2.3(b)</li> <li>• 5A 2.3(c)</li> <li>• 5A 2.3(e)</li> <li>• 5A 2.3(j)</li> </ul>	Support	Kāinga Ora supports the proposed changes to the rules	<i>Retain as notified and delete as proposed</i>
130.	Chapter 5A Central Commercial Activity Area	Appendices <ul style="list-style-type: none"> <li>• Central Commercial 1 Precincts</li> <li>• Central Commercial 2 Maximum Height</li> <li>• Central Commercial 5 Wind Protection</li> <li>• Central Commercial 6 - Wind Report</li> </ul>	Support	Kāinga Ora supports the proposed deletion of the appendices	<i>Delete as proposed</i>
131.	Chapter 5A Central Commercial Activity Area	Entire chapter and Appendix 8 - Central Commercial Design Guide	Oppose	Kāinga Ora opposes the inclusion of Design Guidelines in the Plan, which	1. Kāinga Ora seeks the Design Guidelines are removed from within the District Plan and are treated as non-statutory tool, outside

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>act as de facto rules to be complied with.</p> <p>Kāinga Ora opposes any policy or rule that requires development proposals to be consistent with such design guidelines in the District Plan.</p> <p>Kāinga Ora alternatively seeks and supports design guidelines sitting outside the Plan as guidance regarding best practice design outcomes. The Design Guidelines should be treated as a non-statutory tool.</p> <p>If there is content of a Design Guideline that Council wants in the Plan, Kāinga Ora seeks that these are relocated within a specific rule, matter of discretion or assessment criterion.</p> <p>Where particular design outcomes are to be achieved, these should be specified in matters of discretion or assessment.</p>	<p>of the District Plan. A note should be added where reference is made to such guidelines:</p> <p><i>Note:</i></p> <ol style="list-style-type: none"> <li>2. <u>Acceptable means of compliance and best practice urban design guidance is contained within the Council's Design Guidelines.</u></li> <li>3. Delete all references to the Design Guidelines.</li> <li>4. Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment.</li> <li>5. If the Council does not provide the relief sought, in deleting the design guidelines and references to such guidelines in the District Plan, Kāinga Ora seeks that the design guidelines are amended, simplified and written in a manner that is easy to follow. The</li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				Kāinga Ora seeks all necessary consequential changes to give effect to the relief sought.	outcomes sought in the guidelines should read as desired requirements with sufficient flexibility to provide for a design that fits and works on site, rather than rules that a consent holder must follow and adhere to. Otherwise, there is no flexibility and scope to create a design that fits with specific site characteristics and desired built form development.
132.	Chapter 5B Petone Commercial Activity Area	Entire chapter and zoning framework	Support in part	Kāinga Ora reaffirms that a comprehensive review of the Centres hierarchy is required. The Petone Commercial Activity Area comprises the Petone Commercial Activity Area – Area 1 (traditional retail and Jackson Street area), and Petone Commercial Activity Area – Area 2 (mixed use and offering larger format retail services). The existing zone framework does not align with the National Planning Standards. Notwithstanding this,	<ol style="list-style-type: none"> <li>1. Review the Centres hierarchy and commercial and residential intensification provisions in the Commercial (Centres) and Mixed-Use zones to improve national and regional consistency and increase density and heights across the board.</li> <li>2. The revised centres hierarchy would then translate into an updated centres zoning framework, with clear objectives in each zone stating the intended role and purpose and</li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>Kāinga Ora has approached the submission on the basis that this area would be classified as a Metropolitan Centre Zone (MCZ) under a revised zoning framework, and has accordingly applied principles as to the scale of intensification that would be anticipated in a MCZ and surrounding catchment, to the extent that is possible within the limited scope provided by Plan Change 56.</p>	<p>articulating the planned built urban environment for each zone.</p> <ol style="list-style-type: none"> <li>3. Petone is identified as a locally significant centre in the Proposed Regional Policy Statement Change 1 of Greater Wellington Regional Council. Wellington City Council has proposed a Metropolitan Centre Zone. While Hutt City Council has not changed Petone to a Metropolitan Centre, Kāinga Ora seeks the Petone commercial activity areas to be treated and recognised as a metropolitan centre to seek regional consistency.</li> <li>4. Undertake any consequential changes necessary across Plan Change 56 to address the matters raised above.</li> </ol>
133.	Chapter 5B Petone Commercial Activity Area	Policies in section 5B 1.2.1 - Area 1 Distinctive Character and Built Form of the Area on Jackson Street generally between Victoria and Cuba Streets	Opposes in part	Kāinga Ora recognises and supports the protection and sensitive reuse and adaption of heritage buildings and sites in areas with identified significant heritage values. However, the proposed wording of Policy B	<p><i>Amendments sought</i></p> <p>Policy</p> <ol style="list-style-type: none"> <li>a. External alterations, repairs, or modifications to existing buildings and structures <del>plus</del> <u>and</u> the</li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				places restrictions on development outside of the identified heritage area, which Kāinga Ora does not support. Kāinga Ora seeks the deletion of this proposed policy.	<p>construction of new buildings and structures in the <del>area bounded by Victoria and Cuba Streets must</del> <u>Jackson Street Heritage Precinct</u> comply with the specified design performance standards.</p> <p><del>b. External alterations, repairs, or modifications to existing buildings and structures and the construction of new buildings and structures in Area 1 outside the Jackson Street Heritage Precinct respect the significant historic heritage values, style, and character of the Jackson Street Heritage Precinct.</del></p>
134.	Chapter 5B Petone Commercial Activity Area	Objective within 5B 1.2.3 - Area 2 - Character and Building Form and Quality within Area 2 Petone Mixed Use	Support in part	Kāinga Ora seeks amendment of this objective to recognise that enabling intensification within this area in accordance with the planned urban built environment will alter existing amenity values beyond the activity area. Kāinga Ora seeks amendment to recognise that values may not be “maintained or enhanced” in every case, nor will values be “protected” in this changing environment.	<p><i>Amendments sought</i></p> <p><del>To ensure that t</del> <u>The form and quality of buildings, structures, open space and development overall within the Petone Mixed Use Area is designed to result in a quality interface with the public realm and, where appropriate, minimise adverse effects on surrounding sensitive interfaces, taking into account the planned urban built environment of the area. maintain and</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				Kāinga Ora seeks changes to the objective to account for the changing urban form and amenity values.	<del>enhance the character, amenity values and quality of the environment, whilst recognising and protecting the values and features of adjoining areas</del>
135.	Chapter 5B Petone Commercial Activity Area	Policies in section 5B 1.2.3 - Area 2 - Character and Building Form and Quality within Area 2 Petone Mixed Use	Support	Kāinga Ora supports the unlimited height limit proposed within Area 2 (noting that Kāinga Ora seeks an increased height limit in Area 1 to 53m, consistent with the anticipated built form that Kāinga Ora is seeking in other MCZ elsewhere in the region and nationwide). Kāinga Ora therefore supports the changes to these policies as proposed, recognising that by enabling additional height there is a need to amend the accompanying policy direction so the management of effects is appropriately calibrated.	<i>Retain as notified.</i>
136.	Chapter 5B Petone Commercial Activity Area  Area 1	Permitted Activity Condition 5B 2.1.1.1(b) Maximum Height of Buildings and Structures	Support in part	Kāinga Ora seeks an increase in the height limit applicable to Petone Commercial Activity Area – Area 1 outside of the Jackson Street Heritage Precinct, from 22m to 53m. The Council’s section 32 analysis notes that the Petone Commercial Activity Area is comparable to a	<i>Amendments sought</i>  (b) Maximum Height of Buildings and Structures:  i. <u>10m within the Jackson Street Heritage Precinct</u>



ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				Metropolitan Centre Zone under the National Planning Standards. This change is consistent with height limits Kāinga Ora is seeking in Metropolitan Centres throughout the region.	<p>ii. <del>22m</del> <u>53m</u> where not within the Jackson Street Heritage Precinct</p> <p><del>Maximum Height of Buildings and Structures: 10.0m.</del></p>
137.	Chapter 5B Petone Commercial Activity Area  Area 1	Permitted Activity Condition 5B 2.1.1.1(d) Sites abutting residential activity areas	Support	Kāinga Ora supports the proposed changes to this rule, noting that the adjoining residential area is proposed to be High Density Residential Area, which anticipates an intensive built form. The proposed changes strike an appropriate balance between enabling intensification in the Commercial Area, while managing zone interface effects.	<i>Retain as notified</i>
138.	Chapter 5B Petone Commercial Activity Area  Area 1	Restricted Discretionary Activity Rule 5B 2.1.2(a)	Support in part	As worded, this rule automatically requires resource consent as a Restricted Discretionary Activity for construction related works that are not listed as a Permitted Activity. Residential units above ground floor are listed as Permitted Activities under rule 5B 2.1.1(c). It is unclear whether the intent of this rule is to exclude construction of apartment	<i>Amendments sought</i> <ol style="list-style-type: none"> <li>1. Amend rule, if required, to clarify that the rule is only intended to enable works under the new Permitted Activity Rules 5B 2.1.1 (f) and 5B 2.1.1 (g).</li> <li>2. Introduce non-notification clause to Rule 5B 2.1.2 precluding public and limited notification where compliance is</li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>buildings where residential units are located above the ground floor (or any construction works related to any of the other permitted activities listed at 5B 2.1.1), or whether the rule is only intended to enable works under the new Permitted Activity Rules 5B 2.1.1 (f) and 5B 2.1.1 (g)? If the latter, Kāinga Ora seeks amendments to make reference to these permitted activity rules.</p> <p>Kāinga Ora seeks a non-notification clause for Rule 5B 2.1.2, for both public and limited notification, in instances where development complies with amended 5B 2.1.1.1 (b) <i>Maximum Height</i> and 5B 2.1.1.1 (d) <i>Sites abutting residential activity areas</i>.</p> <p>Beyond this, Kāinga Ora seeks the introduction of a Restricted Discretionary Activity rule for construction work that does not comply with Permitted Activity</p>	<p>achieved with 5B 2.1.1.1 (b) Maximum Height and 5B 2.1.1.1 (d) Sites abutting residential activity areas.</p> <p><a href="#">Where compliance is achieved with 5B 2.1.1.1(b) and 5B 2.1.1.1(d), an application under this rule is precluded from being publicly and limited notified in accordance with sections 95A and 95B of the RMA.</a></p> <p>3. Introduce new restricted discretionary rule for works that do not comply with 5B 2.1.1.1 Permitted Activity Conditions</p> <p><a href="#">Rule 5B 2.1.2A – Restricted Discretionary Activity</a></p> <p><a href="#">(a) Except where stated in the General Rules, any Permitted Activity which fails to comply with any of the Permitted Activity Conditions.</a></p> <p><a href="#">(b) Residential activity on the ground floor of buildings.</a></p> <p><b><a href="#">Matters of Discretion</a></b></p> <p><a href="#">1. The location, design and appearance of the building;</a></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>Conditions (currently automatically escalates to Discretionary Activity), with consequential changes to Rule 5B 2.1.3 to delete these matters from within.</p> <p>Kāinga Ora seeks any consequential changes to the wider rule framework under 5B 2.1.1, 5B 2.1.2, and 5B 2.1.3 to enable these changes to occur.</p>	<p><a href="#">2. Loss of sunlight to adjacent public space;</a></p> <p><a href="#">3. Shading to surrounding buildings;</a></p> <p><a href="#">4. Shading and loss of privacy for any adjacent residential activity;</a></p> <p><a href="#">5. Wind effects on the safety and amenity of the adjacent public space;</a></p> <p><a href="#">6. The planned urban built environment;</a></p> <p><a href="#">7. Whether the location of the residential units promote an active frontage, community safety and visual interest at the pedestrian level; and</a></p> <p><a href="#">8. Whether the use of the ground floor for residential activity could facilitate conversion to commercial use so as not to foreclose future options</a></p> <p>4. Consequential changes to give effect to these changes</p>
139.	Chapter 5B Petone Commercial Activity Area  Area 2	Permitted Activity Condition 5B 2.2.1.1(a) Maximum height and recession plane of buildings and structures	Support	Kāinga Ora supports the proposed amendments, resulting in deletion of the standards and replacement with alternative text specifying that there is no height limit, except where stated on the maximum height overlay that applies. Kāinga	<i>Retain as notified</i>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				Ora notes that there is no maximum height limit proposed in this area, and more generally, Kāinga Ora is seeking a 53m height limit where there is an applicable height control overlay. The proposed rule provides for this.	
140.	Chapter 5B Petone Commercial Activity Area  Area 2	Permitted Activity Condition 5B 2.2.1.1(b) Minimum yard and setback requirements	Support	Kāinga Ora supports the deletion of these minimum yard and setbacks.	<i>Delete as proposed</i>
141.	Chapter 5B Petone Commercial Activity Area  Area 2	Permitted Activity Condition 5B 2.2.1.1(d) Landscaping and screening	Support	Kāinga Ora supports the changes made to this standard.	<i>Retain as notified</i>
142.	Chapter 5B Petone Commercial Activity Area  Area 2	Permitted Activity Condition 5B 2.2.1.1(e) Sites abutting Residential Activity Areas	Support	Kāinga Ora supports the changes made to this standard.	<i>Retain as notified</i>
143.	Chapter 5B Petone Commercial Activity Area	Permitted Activity Condition 5B 2.2.1.1(i) Outdoor Living Areas for Residential Activities	Support in part	Kāinga Ora supports the additional flexibility enabled in this Permitted Activity condition. Kāinga Ora seeks further flexibility to enable a	<i>Amendments sought</i>  (l) Outdoor Living Areas for Residential Activities:

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
	Area 2			<p>proportion of above ground units to have Juliet balconies. This flexibility offers an alternative to requiring balconies for every apartment in a new apartment building in recognition of the more intensive nature of development enabled in this zone. This is appropriate in the equivalent of a MCZ also noting the proximity to services and amenities.</p> <p>Kāinga Ora also seeks the introduction of a non-notification clause precluding both public and limited notification, as a breach to this standard requires an assessment of the quality of internal amenity. It is not a matter that would require consideration of affected parties. Kāinga seeks consequential changes to be made to reflect this within the relevant rule.</p>	<p>A minimum area of 20m<sup>2</sup> per residential unit shall be provided as either private or shared outdoor amenity space. Of this area, a minimum of 2.5m<sup>2</sup> shall be private outdoor space which is contiguous with the main living area of the unit.</p> <p><u>Alternatively, for residential units located entirely above ground floor level the outdoor living space requirement can be satisfied by providing a balcony or roof terrace with a minimum area of 5m<sup>2</sup> with a minimum dimension of 1.8m.</u></p> <p><u>Except, up to 40% of above ground units on a site can be provided with a Juliet balcony instead of a balcony or roof terrace.</u></p> <p><u>An application where compliance is not achieved with this standard is precluded from being publicly or limited notified in accordance with sections 95A and 95B of the RMA.</u></p>
144.	Chapter 5B Petone Commercial Activity Area	Rule 5B 2.2.2	Support in part	Kāinga Ora supports the deletion of arm (b) of the restricted discretionary rule, and notes that	<i>Amendments sought</i>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
	Area 2			<p>any new building will require resource consent as a restricted discretionary activity under this revised rule.</p> <p>Kāinga Ora seeks some further changes to the rule to enable residential facilities to be considered under the RDA activity status, rather than escalating to Discretionary. Kāinga Ora notes that residential facilities provide an alternative form of residential housing and should be appropriately enabled within the Petone Commercial Activity Area.</p>	<p>(a) The construction, alteration of, addition to buildings and structures, except for those works permitted under Rule 5B 2.2.1 (l) and (m).</p> <p><del>(b) The construction, alteration of, addition to buildings and structures over 12 metres in height, except:</del></p> <p style="padding-left: 20px;"><del>i. The alteration of, addition to buildings and structures where the gross floor area of the additions is less than 5% of the gross floor area of the existing building; or</del></p> <p style="padding-left: 20px;"><del>ii. The alteration of, addition of buildings and structures which does not change the external building form (floor area and height) of the existing building.</del></p> <p><a href="#">(b) Residential facilities</a></p> <p>(c) Any Permitted Activity which fails to comply with any of the relevant Permitted Activity Conditions, or relevant requirements of Chapter 14 - General Rules is to be assessed as a Restricted Discretionary Activity unless:</p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					i. Any non-compliance with rules in Chapter 14 – General Rules, is specifically identified as requiring assessment under an alternative activity status.
145.	Chapter 5B Petone Commercial Activity Area  Area 2	Rule 5B 2.2.2.1(a) Matters in which the Council has Restricted its Discretion	Support in part	<p>Kāinga Ora seek amendments to remove direct reference to the design guide and to instead articulate the urban design outcomes that are sought.</p> <p>Kāinga Ora also seeks removal of reference to natural hazards – noting a new chapter is proposed within PC56 to manage hazard related effects.</p>	<p><i>Amendments sought</i></p> <p>a. The construction, alteration of, addition to buildings and structures, except for those works permitted under Rule 5B 2.2.1 (l) and (m)</p> <p>i. Design, external appearance and siting of the building or structures</p> <p><del>ii. Matters in the Petone Mixed Use Area Design Guide</del></p> <ul style="list-style-type: none"> <li><del>• A Design Statement will be required which demonstrates how the proposed development responds to the design guidelines of the Petone Mixed Use Area Design Guide.</del></li> </ul> <p>ii. <u>Alignment with urban design outcomes:</u></p> <ul style="list-style-type: none"> <li>• <u>Provides an effective public private interface</u></li> </ul>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<ul style="list-style-type: none"> <li>• <a href="#">Provides a well-functioning site</a></li> <li>• <a href="#">Provides high quality buildings</a></li> </ul> <p>iii. Amenity Values</p> <ul style="list-style-type: none"> <li>• Effects upon the amenity values both within the site concerned and upon the <a href="#">planned amenity values for surrounding areas</a> from buildings, structures and use of outdoor areas, <a href="#">recognising the planned urban built form of the area</a>.</li> </ul> <p>iv. Landscaping</p> <ul style="list-style-type: none"> <li>• The extent to which landscaping is incorporated to achieve high quality urban design which maintains or enhances the image and visual appearance of the mixed use area.</li> <li>• A landscape plan will be required. This plan should include landscaping of any outdoor onsite parking areas.</li> </ul> <p><del>v. Natural Hazards</del></p>



ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<ul style="list-style-type: none"> <li>• The outcomes of the geotechnical investigation on seismic hazards, including fault rupture, subsidence, tsunami and liquefaction.</li> <li>• Whether the potential risk to the health and safety of people and property from fault rupture, subsidence, tsunami, liquefaction and sea level rise (taking into account changes to these levels arising from climate change), can be avoided or mitigated.</li> <li>• The design and layout of the development, including buildings, to avoid or mitigate the effects from fault rupture, subsidence, tsunami, liquefaction and sea level rise (taking into account changes to these levels arising from climate change).</li> </ul> <p>vi. Capacity of Infrastructure</p> <ul style="list-style-type: none"> <li>• The capacity of the City's infrastructure to service</li> </ul>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p>additional development on the site.</p> <p>vii. Impact on Historic Heritage</p> <ul style="list-style-type: none"> <li>Expected or potential impacts on the historic heritage values of any adjacent Historic Area, Historic Building or Significant Cultural or Archaeological Resource and any measures to be adopted to protect these values.</li> </ul> <p>viii. <u>Cultural significance of Te Puni Urupā</u></p> <ul style="list-style-type: none"> <li><u>Where adjacent, impacts on the cultural and historic values of the Te Puni Urupā.</u></li> </ul>
146.	Chapter 5B Petone Commercial Activity Area  Area 2	Rule 5B 2.2.2.1(b) Matters in which the Council has Restricted its Discretion	Support	Kāinga Ora supports the deletion of the matter of discretion relating to wind effects from buildings in excess of 12m in height.	<i>Delete as proposed</i>
147.	Chapter 5B Petone Commercial Activity Area	Rule 5B 2.2.2.2(b)	Support	Kāinga Ora supports the deletion of the condition requiring compliance with wind standards for buildings in excess of 12m, noting that a new	<i>Delete as proposed</i>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
	Area 2			chapter has been proposed within PC56 to manage wind effects.	
148.	Chapter 5B Petone Commercial Activity Area  Appendices	Appendix 8 Petone Commercial 8 (maximum heights for Petone Commercial Activity Area 2)	Support	Kāinga Ora supports the deletion of this appendix, which is consistent with the removal of a maximum height limit in this area.	<i>Delete as proposed</i>
149.	Chapter 5B Petone Commercial Activity Area  Appendices	Design guides	Oppose	<p>Kāinga Ora opposes the inclusion of Design Guidelines in the Plan, which act as de facto rules to be complied with.</p> <p>Kāinga Ora opposes any policy or rule that requires development proposals to be consistent with such design guidelines in the District Plan.</p> <p>Kāinga Ora alternatively seeks and supports design guidelines sitting outside the Plan as guidance regarding best practice design outcomes. The Design Guidelines should be treated as a non-statutory tool.</p>	<p>1. Kāinga Ora seeks the Design Guidelines are removed from within the District Plan and are treated as non-statutory tool, outside of the District Plan. A note should be added where reference is made to such guidelines:</p> <p><i><u>Note: Acceptable means of compliance and best practice urban design guidance is contained within the Council's Design Guidelines.</u></i></p> <p>2. Delete all references to the Design Guidelines.</p> <p>3. Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment.</p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>If there is content of a Design Guideline that Council wants in the Plan, Kāinga Ora seeks that these are relocated within a specific rule, matter of discretion or assessment criterion.</p> <p>Where particular design outcomes are to be achieved, these should be specified in matters of discretion or assessment.</p> <p>Kāinga Ora seeks all necessary consequential changes to give effect to the relief sought.</p>	<p>4. If the Council does not provide the relief sought, in deleting the design guidelines and references to such guidelines in the District Plan, Kāinga Ora seeks that the design guidelines are amended, simplified and written in a manner that is easy to follow. The outcomes sought in the guidelines should read as desired requirements with sufficient flexibility to provide for a design that fits and works on site, rather than rules that a consent holder must follow and adhere to. Otherwise, there is no flexibility and scope to create a design that fits with specific site characteristics and desired built form development.</p>
150.	Chapter 5E Suburban Mixed Use Activity Area	Entire chapter and zoning framework	Support in part	Kāinga Ora reaffirms that a comprehensive review of the Centres hierarchy is required. The Suburban Mixed Use Activity Area comprises a range of centres that could be classified as Town Centre Zone, Local Centre Zone, or Neighbourhood Centre Zone. The	<p>1. Review the Centres hierarchy and commercial and residential intensification provisions in the Commercial (Centres) and Mixed-Use zones to improve national and regional consistency and increase density and heights across the board.</p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>zone framework within PC56 does not align with the National Planning Standards. Notwithstanding this, Kāinga Ora has approached the submission on the basis that these areas would be classified primarily as Local Centres, and in the case of Naenae and Waterloo, a Town Centre under a revised zoning framework that aligned with the National Planning Standards. This has informed the principles Kāinga Ora has applied to enable appropriate levels of intensification both within the centre, and the surrounding residential environment, to the extent that is possible within the limited scope provided by Plan Change 56.</p> <p>Kāinga Ora recognises that the Naenae and Waterloo commercial areas are prominent commercial areas in the district and should be identified for greater height and development. Kāinga Ora considers Naenae and Waterloo to be town</p>	<ol style="list-style-type: none"> <li>2. Kāinga Ora seeks the expansion of the Suburban Mixed Use Area Zone to cover the most of the Naenae commercial area. This change emphasises the role and function of the Naenae commercial centre in the district and wider urban environment.</li> <li>3. Expand the spatial extent of Naenae Suburban Mixed Use Activity Area to encompass adjacent General Business Activity Area and increase the height limits to 36m.</li> <li>4. Increase the height limit in the Suburban Mixed Use Areas of Naenae and Waterloo to 36m.</li> <li>5. Support height limit of 22m where proposed in PC56, and seek application of a broader 22m height limit across all other centres (other than identified in this submission across the Hutt City. Kāinga Ora considers that there are a number of commercial centres in Hutt City that are considered local centres.</li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				centres in the context of the Hutt City district and greater Wellington region.	6. Rezone the properties at 304-306 Waiwhetu Road, 3, 5, 5A & 5B Rungay St from HDRAA to Suburban Mixed Use Activity Area.
151.	Chapter 5E Suburban Mixed Use Activity Area	5E1 Introduction/Zone Statement	Support in part	Kāinga Ora generally supports the revisions to the introduction, but seeks an amendment to recognise that additional intensification is to be enabled in Naenae and Waterloo, which is considered to be the equivalent of a Town Centre.	<p>Amendments sought:</p> <p>The Suburban Mixed Use Activity Area applies to <del>selected suburban centres generally located in areas of good public transport.</del> <u>local commercial areas that complement the city centre and Petone metropolitan centre.</u> <del>The Suburban Mixed Use Activity Area provides</del> <u>These areas primarily provide</u> for the local convenience needs of surrounding residential areas including local retail, commercial services and offices as well as residential use above ground floor. It addresses expectations of residents <del>of higher density housing types</del> to have easy access to a wide range of facilities and services, <u>particularly residents of higher density housing types.</u></p> <p>The Suburban Mixed Use Activity Area enables intensification and provides for medium <u>to high density development.</u> <u>The highest levels of building height and density are provided for in centres that:</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<ul style="list-style-type: none"> <li>• <u>are located within a walkable catchment of the city centre, <del>or the</del> Petone metropolitan centre, and the Naenae and Waterloo town centres,</u></li> <li>• <u>are located within a walkable catchment of rapid transit stops,</u></li> <li>• <u>have a high level of commercial activity or a wide range of community services.</u></li> </ul> <p><u>Other centres provide for more moderate height to reflect the surrounding residential context.</u></p> <p>New development is expected to be designed to high standards and enhance the quality of the streets and public open space in these centres. The Medium Density Design Guide assists in the development of high quality buildings and environments and provides guidance where permitted activity development standards are not met.</p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
152.	Chapter 5E Suburban Mixed Use Activity Area	Objective 5E 2.2	Support	Kāinga Ora supports the revised objective as it recognises that there will be a change in the anticipated urban built form to one that includes high density built outcomes.	<i>Retain as notified</i>
153.	Chapter 5E Suburban Mixed Use Activity Area	Objective 5E 2.3	Support	Kāinga Ora supports the revised objective as it recognises that they will be a change in the anticipated urban built form to one that includes high density built outcomes.	<i>Retain as notified</i>
154.	Chapter 5E Suburban Mixed Use Activity Area	Objective 5E 2.4	Support in part	Kāinga Ora agrees with managing zone interface effects but opposes the objective in its proposed form. Intensive development within the commercial centre is explicitly encouraged; however, the objective as proposed could require any development in the centre to be consistent with the amenity values of surrounding residential areas. This places an undue constraint on the ability to intensify the centres. Kāinga Ora considers that the height in relation to boundary standards are appropriate to manage amenity	<p><i>Amendments sought</i></p> <p><a href="#"><u>Built development shall maintain is consistent with the amenity values expected in the planned urban environment of adjoining residential areas.</u></a></p> <p><a href="#"><u>Built development adjoining residential areas minimises adverse effects on the amenity values of adjacent sites in Residential Zones, taking into account the planned urban built environment of the Suburban Mixed Use Activity Area and surrounding residential environment.</u></a></p>



ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				values of adjacent residential neighbourhoods, but the rest of the planning framework should seek to maximise the benefits of intensification. Amendments sought.	
155.	Chapter 5E Suburban Mixed Use Activity Area	Objective 5E 2.6	Support	Kāinga Ora supports the deletion of this objective, noting a separate chapter relevant to natural hazards is proposed to manage such effects.	<i>Delete as notified</i>
156.	Chapter 5E Suburban Mixed Use Activity Area	Policy 5E 3.5	Support in part	Kāinga Ora generally supports the intent of the revised objective, but seeks amendments to refine the outcome sought recognising that amenity values will change relative to the planned urban built environment.	<i>Amendments sought</i>  Enable the efficient use of land through medium <b>to high</b> density built development while managing any adverse effects on the environment, including effects on infrastructure and residential amenity, <a href="#">having regard to the planned urban built environment of the activity area.</a>
157.	Chapter 5E Suburban Mixed Use Activity Area	Policy 5E 3.6	Support	Kāinga Ora supports the revisions to this policy, which recognises a more intensive urban built form is to be enabled.	<i>Retain as notified</i>
158.	Chapter 5E Suburban Mixed Use Activity Area	Policy 5E 3.7	Support in part	Kāinga Ora supports the intent to simplify the policy, but opposes the proposed wording and seeks a	<i>Amendments sought</i>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				replacement policy that more clearly articulates the intended management of zone interface effects.	<p><del>Require built development adjoining Residential Activity Areas to manage the effects on the amenity of those areas, having specific regard to visual dominance, privacy and shading.</del></p> <p><u>Minimise the adverse effects from development and activities directly adjoining sites within adjacent residential areas by ensuring that:</u></p> <ol style="list-style-type: none"> <li>1. <u>Buildings are located and designed to achieve a transition at the zone interface;</u></li> <li>2. <u>Buildings are located and designed to minimise shading and privacy effects</u></li> </ol>
159.	Chapter 5E Suburban Mixed Use Activity Area	Policy 5E 3.10	Support	Kāinga Ora supports the deletion of this policy, noting a separate chapter relevant to natural hazards is proposed to manage such effects.	<i>Delete as notified</i>
160.	Chapter 5E Suburban Mixed Use Activity Area	Rule 5E 4.1.4 Residential Activities	Changes sought	Kāinga Ora notes that no changes are proposed to this rule. Notwithstanding this, Kāinga Ora seeks amendments to this rule, to focus the assessment relevant more clearly to the issue being managed.	<i>Amendments sought</i>  (a) Residential Activities are <b>permitted</b> activities if: i. The <u>dwelling residential unit</u> is located above the ground floor; or

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>Kāinga Ora also seeks the introduction of a non-notification clause precluding both public and limited notification, as a breach to this rule requires an assessment upon the internal amenity and the streetscape/public realm. It is not a matter that would require consideration of affected parties.</p>	<p>ii. The <a href="#">dwelling residential unit</a> is located on the ground floor but has no frontage to public open spaces including streets except for access.</p> <p>(b) Residential Activities that do not meet the above permitted activity standards are <b>restricted discretionary</b> activities.</p> <p><b>Discretion is restricted to:</b></p> <ul style="list-style-type: none"> <li>i. The effects on the continuity of the design and appearance of the frontage of buildings including display windows and verandahs.</li> <li>ii. The effects on the amenity of the streetscape and public open space.</li> <li>iii. The effects on the privacy and amenity of residents of the site.</li> <li><del>iv. The following mixed use and medium density residential development design elements:</del> <ul style="list-style-type: none"> <li><del>1. Building height</del></li> <li><del>2. Recession planes and setbacks</del></li> <li><del>3. Indoor and outdoor living spaces</del></li> <li><del>4. Open space and boundary treatments</del></li> </ul> </li> </ul>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><del>5.—Entrances, carparking and garages</del></p> <p><del>6.— On-site stormwater management</del></p> <p><del>7.— End / side wall treatment</del></p> <p><del>8.— Building materials</del></p> <p><del>9.— Bike parking, storage and service areas</del></p> <p><del>10.— Privacy and safety</del></p> <p><del>11.— Landscaping</del></p> <p><del>When considering the matters in (iv), the Council will be principally guided by its Medium Density Design Guide.</del></p> <p><u>An application under this rule where compliance is not achieved is precluded from being publicly or limited notified in accordance with sections 95A and 95B of the RMA.</u></p>
161.	Chapter 5E Suburban Mixed Use Activity Area	Rule 5E 4.1.5 Care Facilities, Residential Facilities, Boarding Houses, Hostels and Visitor Accommodation	Changes sought	Kāinga Ora notes that no changes are proposed to this rule. Notwithstanding this, Kāinga Ora seeks amendments to this rule, to focus the assessment relevant more clearly to the issue being managed.	<p><i>Amendments sought</i></p> <p>(a) Care Facilities, Residential Facilities, Boarding Houses, Hostels and Visitor Accommodation are <b>permitted</b> activities if:</p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>Kāinga Ora also seeks the introduction of a non-notification clause precluding both public and limited notification, as a breach to this rule requires an assessment upon the internal amenity and the streetscape/public realm. It is not a matter that would require consideration of affected parties.</p>	<ul style="list-style-type: none"> <li>i. <del>Any h-Habitable</del> rooms are located above the ground floor; or</li> <li>ii. Any habitable rooms located on the ground floor have no frontage to public open spaces including streets.</li> </ul> <p>(b) Care Facilities, Residential Facilities, Boarding Houses, Hostels and Visitor Accommodation that do not meet the above permitted activity standards are <b>restricted discretionary</b> activities.</p> <p><b>Discretion is restricted to:</b></p> <ul style="list-style-type: none"> <li>i. The effects on the continuity of the design and appearance of the frontage of buildings including display windows and verandahs.</li> <li>ii. The effects on the amenity of the streetscape and public open space.</li> <li>iii. The effects on the privacy and amenity of residents of the site.</li> <li>iv. <del>The following mixed use and medium density residential development design elements:</del> <ul style="list-style-type: none"> <li>1. <del>Building height</del></li> <li>2. <del>Recession planes and setbacks</del></li> <li>3. <del>Indoor and outdoor living spaces</del></li> </ul> </li> </ul>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p>4. <del>Open space and boundary treatments</del></p> <p>5. <del>Entrances, carparking and garages</del></p> <p>6. <del>On-site stormwater management</del></p> <p>7. <del>End / side wall treatment</del></p> <p>8. <del>Building materials</del></p> <p>9. <del>Bike parking, storage and service areas</del></p> <p>10. <del>Privacy and safety</del></p> <p>11. <del>Landscaping</del></p> <p><del>When considering the matters in (iv), the Council will be principally guided by its Medium Density Design Guide.</del></p> <p><u>An application under this rule where compliance is not achieved is precluded from being publicly or limited notified in accordance with sections 95A and 95B of the RMA.</u></p>
162.	Chapter 5E Suburban Mixed Use Activity Area	Rule 5E 4.2.1 Building height	Support in part	Outside of requirements to increase height limits in accordance with Policy 3 of the NPSUD, Kāinga Ora seeks the following minimum height limits to be applied to centres	<p><i>Amendments sought</i></p> <p>(a) Construction or alteration of a building is a permitted activity if:</p> <p>i. The building <u>is within a specific height control overlay shown on the District</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought																														
				<p>following a revised centres hierarchy:</p> <ul style="list-style-type: none"> <li>Centres that are the equivalent to a Neighbourhood Centre Zone (except those located within 800m of a train station) – 12m</li> <li>Centres that are the equivalent to a Local Centres Zone and/or within 800m of a train station – 22m</li> <li>Naenae Centre, which is the equivalent of a Town Centre Zone – 36m</li> <li>Waterloo Centre and train station area, which is the equivalent of a Town Centre Zone – 36m</li> </ul> <p>Kāinga Ora seeks all consequential changes through provisions and within the maps.</p> <p>In addition, Kāinga Ora seeks amendments to this rule, to focus</p>	<p><del>Plan map and</del> <b>does not exceed the maximum height shown for that overlay, or in the table below</b></p> <p>ii. <b>In any other case, the building</b> does not exceed a maximum height of 12m.</p> <table border="1" data-bbox="1697 619 2094 1343"> <thead> <tr> <th>CENTRE</th> <th>HEIGHT LIMIT</th> </tr> </thead> <tbody> <tr><td><a href="#">Alicetown</a></td><td>22m</td></tr> <tr><td><a href="#">Moera</a></td><td>22m</td></tr> <tr><td><a href="#">Waiwhetu &amp; Wainui Road</a></td><td>22m</td></tr> <tr><td><a href="#">Woburn – White Lines West</a></td><td>22m</td></tr> <tr><td><a href="#">Waterloo</a></td><td>36m</td></tr> <tr><td><a href="#">Fairfield</a></td><td>22m</td></tr> <tr><td><a href="#">Epuni – Witako St</a></td><td>22m</td></tr> <tr><td><a href="#">Epuni – Oxford Tce</a></td><td>22m</td></tr> <tr><td><a href="#">Boulcott -Boulcott St</a></td><td>22m</td></tr> <tr><td><a href="#">Boulcott - Mitchell St</a></td><td>22m</td></tr> <tr><td><a href="#">Melling - Hutt Road</a></td><td>22m</td></tr> <tr><td><a href="#">Cuba St/Atiawa St</a></td><td>22m</td></tr> <tr><td><a href="#">High Street – Stellin St/Park Ave/Daysh St</a></td><td>22m</td></tr> <tr><td><a href="#">Avalon – High St/Tennyson Ave/Cottle St/De Menech Gr</a></td><td>22m</td></tr> </tbody> </table>	CENTRE	HEIGHT LIMIT	<a href="#">Alicetown</a>	22m	<a href="#">Moera</a>	22m	<a href="#">Waiwhetu &amp; Wainui Road</a>	22m	<a href="#">Woburn – White Lines West</a>	22m	<a href="#">Waterloo</a>	36m	<a href="#">Fairfield</a>	22m	<a href="#">Epuni – Witako St</a>	22m	<a href="#">Epuni – Oxford Tce</a>	22m	<a href="#">Boulcott -Boulcott St</a>	22m	<a href="#">Boulcott - Mitchell St</a>	22m	<a href="#">Melling - Hutt Road</a>	22m	<a href="#">Cuba St/Atiawa St</a>	22m	<a href="#">High Street – Stellin St/Park Ave/Daysh St</a>	22m	<a href="#">Avalon – High St/Tennyson Ave/Cottle St/De Menech Gr</a>	22m
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				the assessment relevant more clearly to the issue being managed.	<table border="1" data-bbox="1697 371 2092 730"> <tr> <td><a href="#">Taita south - High St and Burcham St</a></td> <td><a href="#">22m</a></td> </tr> <tr> <td><a href="#">Taita north – High St and Farmer Cres</a></td> <td><a href="#">22m</a></td> </tr> <tr> <td><a href="#">Taita</a></td> <td><a href="#">22m</a></td> </tr> <tr> <td><a href="#">Stokes Valley</a></td> <td><a href="#">22m</a></td> </tr> <tr> <td><a href="#">Wainuiomata</a></td> <td><a href="#">22m</a></td> </tr> <tr> <td><a href="#">Eastbourne</a></td> <td><a href="#">22m</a></td> </tr> <tr> <td><a href="#">Naenae – Treadwell St/Naenae Road</a></td> <td><a href="#">22m</a></td> </tr> <tr> <td><a href="#">Naenae Town Centre</a></td> <td><a href="#">36m</a></td> </tr> </table> <p data-bbox="1608 775 2130 911">(b) Construction or alteration of a building that exceeds the maximum height of <del>12m</del> <a href="#">in Rule 5E 4.2.1(a)</a> is a <b>restricted discretionary</b> activity.</p> <p data-bbox="1608 951 1928 975"><b>Discretion is restricted to:</b></p> <ul style="list-style-type: none"> <li data-bbox="1659 986 2051 1050">i. The effects on the amenity of adjoining sites.</li> <li data-bbox="1659 1058 2152 1121">ii. The effects on the privacy of adjoining sites.</li> <li data-bbox="1659 1129 2119 1193">iii. The effects on shading of adjoining sites.</li> <li data-bbox="1659 1201 2130 1337">iv. The effects on the amenity of adjoining Residential Activity Areas, the streetscape and adjoining public space.</li> </ul>	<a href="#">Taita south - High St and Burcham St</a>	<a href="#">22m</a>	<a href="#">Taita north – High St and Farmer Cres</a>	<a href="#">22m</a>	<a href="#">Taita</a>	<a href="#">22m</a>	<a href="#">Stokes Valley</a>	<a href="#">22m</a>	<a href="#">Wainuiomata</a>	<a href="#">22m</a>	<a href="#">Eastbourne</a>	<a href="#">22m</a>	<a href="#">Naenae – Treadwell St/Naenae Road</a>	<a href="#">22m</a>	<a href="#">Naenae Town Centre</a>	<a href="#">36m</a>
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					<del>v. The following mixed use and medium density residential development design elements:</del> <ol style="list-style-type: none"> <li><del>1. Building height</del></li> <li><del>2. Recession planes and setbacks</del></li> <li><del>3. Indoor and outdoor living spaces</del></li> <li><del>4. Open space and boundary treatments</del></li> <li><del>5. Entrances, carparking and garages</del></li> <li><del>6. On-site stormwater management</del></li> <li><del>7. End / side wall treatment</del></li> <li><del>8. Building materials</del></li> <li><del>9. Bike parking, storage and service areas</del></li> <li><del>10. Privacy and safety</del></li> <li><del>11. Landscaping</del></li> </ol> <del>When considering the matters in (iv), the Council will be principally guided by its Medium Density Design Guide.</del>
163.	Chapter 5E Suburban Mixed Use Activity Area	Rule 5E 4.2.3 Yards	Support	Kāinga Ora supports the revised yards standards, noting they align with the MDRS.	<i>Retain as notified</i>
164.	Chapter 5E Suburban Mixed Use Activity Area	Rule 5E 4.2.4 Outdoor living space	Support in part	Kāinga Ora supports the additional flexibility enabled in this Permitted Activity condition. Kāinga Ora seeks	<i>Amendments sought</i>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
				<p>further flexibility to enable a proportion of above ground units to have Juliet balconies. This flexibility offers an alternative to requiring balconies for every apartment in a new apartment building in recognition of the more intensive nature of development enabled in this zone.</p> <p>In addition, Kāinga Ora seeks amendments to this rule, to focus the assessment relevant more clearly to the issue being managed.</p> <p>Kāinga Ora also seeks the introduction of a non-notification clause precluding both public and limited notification, as a breach to this rule requires an assessment of the quality of internal amenity. It is not a matter that would require consideration of affected parties.</p>	<p>(a) Construction or alteration of a building is a <b>permitted activity</b> if:</p> <p>(i) Each dwelling has an outdoor living space that:</p> <ol style="list-style-type: none"> <li>1. Has a minimum area of 10m<sup>2</sup>.</li> <li>2. Has a minimum dimension of 2m.</li> <li>3. Has direct access from the dwelling to which it relates.</li> </ol> <p>For dwellings located entirely above ground floor level the outdoor living space requirement can be satisfied by providing a balcony or roof terrace with a minimum area of 5m<sup>2</sup> with a minimum dimension of <del>2m</del> <u>1.8m</u>.</p> <p><u>Except, up to 40% of above ground units on a site can be provided with a Juliet balcony instead of a balcony or roof terrace.</u></p> <p>(b) Construction or alteration of a building that does not meet the outdoor living space requirements is a restricted discretionary activity.</p> <p><b>Discretion is restricted to:</b></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<ul style="list-style-type: none"> <li>i. The effects on the amenity for residents of the site, including access to sunlight and open space and the usability and accessibility of the outdoor living space proposed.</li> <li>ii. The proximity of the site to communal or public open space that has the potential to mitigate any lack of private outdoor living space.</li> <li>iii. <del>The following mixed use and medium density residential development design elements:</del> <ul style="list-style-type: none"> <li><del>1. Building height</del></li> <li><del>2. Recession planes and setbacks</del></li> <li><del>3. Indoor and outdoor living spaces</del></li> <li><del>4. Open space and boundary treatments</del></li> <li><del>5. Entrances, carparking and garages</del></li> <li><del>6. Onsite stormwater management</del></li> <li><del>7. End / side wall treatment</del></li> <li><del>8. Building materials</del></li> <li><del>9. Bike parking, storage and service areas</del></li> <li><del>10. Privacy and safety</del></li> <li><del>11. Landscaping</del></li> </ul> </li> </ul>

ID	Section of Plan	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought
					<p><del>When considering the matters in (iii), the Council will be principally guided by its Medium Density Design Guide.</del></p> <p><u>An application under this rule where compliance is not achieved is precluded from being publicly or limited notified in accordance with sections 95A and 95B of the RMA.</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
<b>Chapter 11 – Subdivision</b>					
165.	Chapter 11 – Subdivision	Objective (b)  Section 11.1.3 Natural Hazards	Support	Kāinga Ora supports the proposed new objective, which requires subdivision to not increase the risk of natural hazards, including coastal hazards.	<i>Retain as notified</i>
166.	Chapter 11 – Subdivision	Policies of section 11.1.3 Natural Hazards	Oppose	<p>Kāinga Ora seeks a simplified policy, which addresses the requirement to manage risk from natural hazards. An alternative policy is provided.</p> <p>It is noted that the alternative policy refers to natural hazards <i>identified</i> in the District Plan. As noted elsewhere in this submission, Kāinga Ora opposes flood hazards being mapped in the Plan, and instead seeks definitions to appropriately <i>identify</i> such hazards in the plan.</p>	<p><i>Amendments sought</i></p> <p><b>Policy</b></p> <p>Delete:</p> <p><del>(a) Subdivision of land within the Wellington Fault Special Study Area shall ensure that the allotments are of sufficient size and shape so that buildings and structures are not sited within twenty metres of a faultline.</del></p> <p><del>(aa) Subdivision of land within the Wellington Fault Hazard Overlay shall ensure that the allotments are of sufficient size and shape so that the building platform is at least 20m from the Wellington Faultline.</del></p> <p><del>(b) Subdivision of land subject to flooding is discouraged as this can lead to</del></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
					<p><del>greater intensity of use and development and have adverse effects on the environment.</del></p> <p><del>(ba) Subdivision shall ensure that any building platform is not located within an identified Stream Corridor.</del></p> <p><del>(bb) Subdivision where building platforms are within overland flow paths shall ensure that overland flowpaths are not impeded and mitigation measures are incorporated into the subdivision to avoid any increase in risk to people or property, including neighbouring</del></p> <p><del>(bc) Subdivision where the building platforms are within the Inundation Area shall include mitigation measures to avoid any increase in risk to people or property, including neighbouring properties.</del></p> <p><del>(bd) Subdivision where the building platforms are within the Medium and High Coastal Hazard Overlays shall include mitigation measures to avoid any increase in risk to people or property, including neighbouring properties.</del></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
					<p><del>(c) Subdivision of land should be managed to ensure that within each allotment there is a suitable building platform so that buildings and associated structures will not be adversely affected by slope instability, including the deposition of debris.</del></p> <p>Replace with:</p> <p><u>Take a risk-based approach to the management of subdivision of land affected by natural hazards and coastal hazards identified in the District Plan based on:</u></p> <ol style="list-style-type: none"> <li>1. <u>The sensitivity of the activities to the impacts of natural hazards; and</u></li> <li>2. <u>The hazard posed to people’s lives and wellbeing, and property, by considering the likelihood and consequences of differing natural hazard events.</u></li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
167.	Chapter 11 – Subdivision	Objective 2  Section 11.1.4 Special Areas	Support	Kāinga Ora supports the protection of identified heritage precincts from inappropriate subdivision	<i>Retain as notified</i>
168.	Chapter 11 – Subdivision	Policy b  Section 11.1.4 Special Areas	Support in part	<p>Kāinga Ora supports a new policy, but seeks alternative wording to better achieve both the outcome sought by the policy, and the underlying zone.</p> <p>Consequential changes are also sought as per the Residential Heritage submission points whereby Kāinga Ora seeks that all heritage provisions are an overlay and not a precinct.</p>	<p><i>Amendments sought</i></p> <p><del>(b) Protect the historic heritage values in the Historic Residential Precinct and Patrick Street-Riddlers Crescent by managing density of development enabled by subdivision of land.</del></p> <p><u>b) Provide for the subdivision of land within Historic Residential Overlays and Patrick Street-Riddlers Crescent, having regard to the extent to which the subdivision and any anticipated development would detract from the identified heritage values.</u></p>
169.	Chapter 11 - Subdivision	11.2.2 Controlled Activities	Support in part	Kāinga Ora generally supports the changes to this rule to reflect the proposed change in zones. However, to achieve the outcome of Clause 5(3) of Schedule 3A the Act, Kāinga Ora seeks the inclusion of a non-notification clause precluding both public and limited notification.	<p><i>Amendment sought</i></p> <p>Introduce non-notification clause for Rule 11.2.2 for both public and limited notification.</p>



ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
				Kāinga Ora notes that while s95A(5)(b) provides for preclusion of Controlled Activity resource consents (both land use and subdivision), s95B(6)(b) does not automatically preclude notification for Controlled Activity subdivision consents.	
170.	Chapter 11 – Subdivision	11.2.2.1 Controlled Activity Standard and Terms (a) Allotment Design	Support in part	<p>Kāinga Ora supports:</p> <ul style="list-style-type: none"> <li>• A controlled activity status</li> <li>• Amendment to Medium Density Residential Activity Area table to include High Density and the following matters within the table <ul style="list-style-type: none"> <li>○ No minimum allotment size</li> <li>○ Matters set out in (i)</li> </ul> </li> </ul> <p>Kāinga Ora seeks the following changes to the Medium Density Residential Activity Area and High Density Residential Activity Area table:</p> <ul style="list-style-type: none"> <li>• Alter chapeau of (ii) from “resulting allotments with no</li> </ul>	<p><i>Amendments sought</i></p> <p>...</p> <p><del>Resulting allotments with no residential units:</del> (ii) <del>For every allotment where there is no existing dwelling, or for which no existing land use consent for a dwelling has been granted, or is being concurrently granted (in the case of joint land use and subdivision applications): It can be demonstrated that it is practicable to construct on all allotments, as a permitted activity, a dwelling which complies with all relevant Medium Density Residential Development Standards specified in 4F-4.2.</del></p> <p><del>Vacant allotments:</del> <del>For any resulting vacant allotments with no existing residential unit:</del></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
				<p>residential units” to “vacant allotments” and text within to reflect this change</p> <ul style="list-style-type: none"> <li>• Revise Point A from needing to demonstrate that a permitted dwelling can be constructed (which could require hypothetical plans to be produced at the consent stage) to instead require a minimum shape factor of 8m x 15m.</li> <li>• Deletion of minimum frontage standard, which is consistent with the proposed changes to 11.2.2.3(b)(i) within PC56.</li> </ul>	<p>A. <a href="#">It is practicable to construct a residential unit on the allotment as a permitted activity the allotment can accommodate a rectangle with a shape factor of 8m x 15m, or</a></p> <p>B. <a href="#">Land use consent has been granted for the proposed use of the site (including built development), or</a></p> <p>C. <a href="#">The subdivision application is accompanied by a land use application for the proposed use of the site that will be determined concurrently with the subdivision application.</a></p> <p>Minimum frontage 3m to ensure that there is drive on access to the allotment. For rear allotments the 3m frontage may be satisfied through a registered Right of Way outside the title (outside legal boundaries of the allotment).</p>
171.	Chapter 11 – Subdivision	11.2.3 Restricted Discretionary Activities	Support in part	Kāinga Ora supports the introduction of 11.2.3(e), (f), and (g) relating to natural hazards as Restricted Discretionary Activities.	<p><i>Amendments sought</i></p> <p>11.2.3 Restricted Discretionary Activities</p> <p>a) Any subdivision that does not comply with the standards and terms for</p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
				<p>Kāinga Ora seeks a new RDA rule framework for subdivisions that do not meet the Standards and Terms of the Controlled Activity Rule (a) <i>Allotment Design</i> for Medium Density Residential Activity Area and High Density Activity Area. This is consistent with the activity status that is applied in both the WCC, and PCC proposed district plans for the same aspect of non-compliance.</p> <p>Kāinga Ora seeks consequential changes to introduce new matters of discretion relevant to this new rule in 11.2.3.1.</p>	<p>controlled activity under Rule 11.2.2.1 in respect of <a href="#">(a) Allotment Design for Medium Density Residential Activity Area and High Density Activity Areas</a> (b) Engineering Design, (c) Contamination and (e) Earthworks.</p> <p>i. <a href="#">Non-notification In respect of Rule 11.2.3 (a) in relation to a breach of the standards and terms to Rule 11.2.2.1 (a), public and limited notification of applications for resource consent is precluded.</a></p>
172.	Chapter 11 – Subdivision	11.2.3.1 Restricted Discretionary Activities – Matters of Discretion	Support in part	<p>Kāinga Ora seeks consequential changes to introduce new matters of discretion as a result of the proposed RDA rule at 11.2.3.</p> <p>Kāinga Ora supports the proposed changes to 11.2.3.1 with regard to introducing discretion to consider natural and coastal hazards. However, consequential changes are</p>	<p><i>Amendments sought</i></p> <ol style="list-style-type: none"> <li>1. Change to 11.2.3.1 (a) 11.2.3.1 Matters in which Council has restricted its discretion <ol style="list-style-type: none"> <li>a. Any subdivision that does not comply with the standards and terms for controlled activity under Rule 11.2.2.1 in respect of <a href="#">(a) allotment design</a>, (b) Engineering Design, (c) Contamination and (e) Earthworks.</li> </ol> </li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
				sought to remove reference Flood Hazard Overlay in 11.2.3.1(d).	<p>...</p> <p>(ia) The matters of control under Rule 11.2.2.2.</p> <p>(iaa) Whether the allotment design</p> <ul style="list-style-type: none"> <li>○ <u>reflects the intended pattern of development and are consistent with the purpose, character and amenity values of the zone and</u></li> <li>○ <u>is adequately sized to accommodate the intended development form for the activity area</u></li> <li>○ <u>whether the staging of the subdivision relative to building construction is efficient and appropriate to the scale and complexity of the overall development</u></li> </ul> <p>...</p> <p>2. Consequential change to remove reference to Flood Hazard Overlay in 11.2.3.1(d).</p>
173.	Chapter 11 – Subdivision	11.2.4 Discretionary Activities	Support in par	Kāinga Ora supports the proposed amendments to this rule, introducing subdivision within identified historic precinct areas, and where building platforms are located	<i>Amend with consequential changes.</i>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
				in within the Wellington Fault Hazard Overlay and High Coastal Hazard Overlay as Discretionary Activities. Consequential changes are requested in terms of renaming historic heritage precincts to overlays as per the relevant Kāinga Ora submission points.	
174.	Chapter 11 – Subdivision	11.2.5 Non-Complying Activities	Support	Kāinga Ora supports the proposed amendments to this rule, introducing subdivision resulting in a building platform within the stream corridor as a Non-Complying Activity.	<i>Retain as notified</i>
<b>Chapter 14H – Natural Hazards</b>					
175.	Chapter 14H Natural Hazards	Flood Hazard Overlay	Oppose	Kāinga Ora opposes the inclusion of flood hazard mapping as part of the District Plan. Including Flood Hazard overlays in the District Plan ignores the dynamic nature of flood hazards and will create unnecessary additional cost and uncertainty for landowners and land developers. Kāinga Ora agrees that it is	<i>Amendments sought:</i> <ol style="list-style-type: none"> <li>1. Remove natural hazard flooding overlay(s) from the District Plan statutory maps, and instead hold this information in non-statutory GIS maps</li> <li>2. Creation of new definitions to identify flood hazards in the Plan</li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriate to include provisions and rules to manage the risk of flood hazards but seeks that the rules are not linked to static maps contained within the District Plan. Instead, the rules can be linked to defined terms of the hazards. The Auckland Unitary Plan (“AUP”) adopts a set of non-statutory flood hazard overlay maps which operate as interactive maps on the Council’s ‘Geo Maps’ website – a separate mapping viewer to the statutory maps. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 process under the RMA. Kāinga Ora notes that there is no formal requirement for flooding overlay maps to be included within a district plan. Kāinga Ora also notes that the National Planning Standards 2016 – Mapping Standard Table 20</p>	<ol style="list-style-type: none"> <li>3. Amended rule framework to enable rules to be linked to newly defined terms of Flood Hazards</li> <li>4. Revise reference throughout plan to delete “flood hazard overlay”</li> <li>5. Consequential changes to give effect to this submission</li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
				<p>includes a number of specific overlay and other symbols, but none relate to flooding.</p> <p>To ensure the rule framework continues to be linked to identified flood hazards, Kāinga Ora suggests definitions be introduced as a consequential amendment to ensure the hazards are appropriately “identified” in the Plan. Such definitions are anticipated to include:</p> <ul style="list-style-type: none"> <li>• Flood Hazard – Stream Corridor</li> <li>• Flood Hazard - Overland Flowpath</li> <li>• Flood Hazard – Inundation</li> <li>• High Hazard Area</li> <li>• 1% Annual Exceedance Probability Flood</li> </ul> <p>Kāinga Ora otherwise supports the mapping of other, non-flooding natural hazards to be incorporated into the District Plan maps, such as Fault Hazards (in additional to</p>	

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought										
				Coastal Hazards), as these hazards are less subject to change.											
176.	Chapter 14H Natural Hazards	Introduction	Support in part	<p>Kāinga Ora generally supports the introduction, but seeks removal of the use of “overlay” from the table identifying the Natural Hazards.</p> <p>Kāinga Ora also seeks removal of reference to flood hazard maps under the “Overlay” section of the introduction. It is noted that Kāinga Ora has offered elsewhere in this submission additional definitions for flood hazards to ensure these are still <i>identified</i> in the District Plan.</p> <p>In addition to the above, Kāinga Ora queries the length and level of detail within the introduction. For example, Kāinga Ora questions the need to list all relevant overlays and potential mitigation methods. Kāinga Ora also considers that any terms relied on within provisions should be contained within</p>	<p><i>Amendments sought</i></p> <p>[Remove reference to “Overlay” in the Natural Hazard table]</p> <table border="1" data-bbox="1599 643 2166 1134"> <thead> <tr> <th data-bbox="1599 643 2013 730"><u>Natural Hazard</u> <u>Overlay</u></th> <th data-bbox="2013 643 2166 730"><u>Respective Hazard Ranking</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="1599 730 2013 807"><u>Wellington Fault Rupture (within 20m of known fault)</u></td> <td data-bbox="2013 730 2166 807"><u>High</u></td> </tr> <tr> <td data-bbox="1599 807 2013 916"><u>Stream Corridor (1:100 year inundation event + 1m sea level rise)</u></td> <td data-bbox="2013 807 2166 916"></td> </tr> <tr> <td data-bbox="1599 916 2013 1024"><u>Overland Flowpath (1:100 year inundation event + 1m sea level rise)</u></td> <td data-bbox="2013 916 2166 1024"><u>Medium</u></td> </tr> <tr> <td data-bbox="1599 1024 2013 1134"><u>Inundation Area (1:100 year inundation extent + 1m sea level rise)</u></td> <td data-bbox="2013 1024 2166 1134"><u>Low</u></td> </tr> </tbody> </table> <p>[Remove reference to flood hazards from the “Overlays” section of the introduction]</p> <p><u>Overlays</u></p>	<u>Natural Hazard</u> <u>Overlay</u>	<u>Respective Hazard Ranking</u>	<u>Wellington Fault Rupture (within 20m of known fault)</u>	<u>High</u>	<u>Stream Corridor (1:100 year inundation event + 1m sea level rise)</u>		<u>Overland Flowpath (1:100 year inundation event + 1m sea level rise)</u>	<u>Medium</u>	<u>Inundation Area (1:100 year inundation extent + 1m sea level rise)</u>	<u>Low</u>
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ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
				<p>definitions. Kāinga Ora seeks consequential changes to the introduction to significantly refine and reduce the content.</p>	<p><u>Natural Hazard Overlays – Means the mapped extent within the District Plan of the following Natural Hazards:</u></p> <ul style="list-style-type: none"> <li>• <u>Fault Rupture Hazards</u></li> <li>• <u>Flood Hazards based on a 1% Annual Exceedance Probability Flood including effects of climate change, including:</u> <ul style="list-style-type: none"> <li>○ <u>Stream corridor</u></li> <li>○ <u>Overland Flow</u></li> <li>○ <u>Inundation Areas</u></li> </ul> </li> </ul> <p>[Reduce content within introduction].</p>
177.	Chapter 14H Natural Hazards	Policy 14H 1.1 Levels of Risk	Support in part	<p>Kāinga Ora supports the risk based approach to managing development and use in areas subject to natural hazards. Amendments are sought to give effect to the relief sought to remove reference to natural hazard overlays insofar as it relates to flooding.</p>	<p><i>Amendments sought</i></p> <p><u>Subdivision, use and development reduce or do not increase the risk to people, property and infrastructure by:</u></p> <ol style="list-style-type: none"> <li>1. <u>Limiting the scale of subdivision, use and development on sites within the medium and high Natural Hazard areas Overlays and the medium and high hazard areas of the Coastal Hazard Overlays; and</u></li> <li>2. <u>Requiring mitigation for subdivision, use and development that addresses the impacts from natural hazards to people, property and infrastructure in</u></li> </ol>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
					<p><a href="#">the low hazard, medium hazard and high hazard areas within the identified Natural Hazard areas and Coastal Hazard Overlays.</a></p>
178.	Chapter 14H Natural Hazards	Policy 14H 1.3 Additions to Buildings in an identified Inundation Area of the Flood Hazard Overlay	Support in part	<p>Kāinga Ora supports this policy, but seeks amendment to the policy chapeau to remove reference to the flood hazard overlay.</p> <p>Kāinga Ora also seeks the inclusion of a note at the end of the policy, which makes reference to flood hazard maps that sit outside of the Plan to help identify, at a property level, whether the site may be subject to flooding.</p>	<p><a href="#">Policy 14H 1.3 Additions to Buildings in an identified Inundation Area of the Flood Hazard Overlay</a></p> <p>...</p> <p><a href="#">Note: The Council holds publicly available information showing the modelled extent of flooding affecting specific properties in its GIS viewer. The maps are non-statutory and can be reviewed to take account of any property-specific information.</a></p>
179.	Chapter 14H Natural Hazards	Policy 14H 1.4 Additions to Buildings within the Overland Flowpaths and Stream Corridors of the Flood Hazard Overlays	Support in part	<p>Kāinga Ora supports this policy, but seeks amendment to the policy chapeau to remove reference to the flood hazard overlay.</p> <p>Kāinga Ora also seeks the inclusion of a note at the end of the policy, which makes reference to flood hazard maps that sit outside of the</p>	<p><a href="#">Policy 14H 1.4 Additions to Buildings within the Overland Flowpaths and Stream Corridors of the Flood Hazard Overlays</a></p> <p>...</p> <p><a href="#">Note: The Council holds publicly available information showing the modelled extent of flooding affecting specific properties in its GIS</a></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
				Plan to help identify, at a property level, whether the site may be subject to flooding.	<a href="#">viewer. The maps are non-statutory and can be reviewed to take account of any property-specific information.</a>
180.	Chapter 14H Natural Hazards	Policy 14H 1.5 New residential units, commercial activities or retail activities within the identified Inundation Areas of the Flood Hazard Overlays	Support in part	<p>Kāinga Ora supports this policy, but seeks amendment to the policy chapeau to remove reference to the flood hazard overlay.</p> <p>Kāinga Ora also seeks the inclusion of a note at the end of the policy, which makes reference to flood hazard maps that sit outside of the Plan to help identify, at a property level, whether the site may be subject to flooding.</p>	<p><b>Policy 14H 1.5 New residential units, commercial activities or retail activities within the identified Inundation Areas of the Flood Hazard Overlays</b></p> <p>...</p> <p><a href="#">Note: The Council holds publicly available information showing the modelled extent of flooding affecting specific properties in its GIS viewer. The maps are non-statutory and can be reviewed to take account of any property-specific information.</a></p>
181.	Chapter 14H Natural Hazards	Policy 14H 1.6 New residential units, commercial activities or retail activities within the Overland Flowpaths of the Flood Hazard Overlays	Support in part	<p>Kāinga Ora supports this policy, but seeks amendment to the policy chapeau to remove reference to the flood hazard overlay.</p> <p>Kāinga Ora also seeks the inclusion of a note at the end of the policy, which makes reference to flood hazard maps that sit outside of the</p>	<p><b>Policy 14H 1.6 New residential units, commercial activities or retail activities within the Overland Flowpaths of the Flood Hazard Overlays</b></p> <p>...</p> <p><a href="#">Note: The Council holds publicly available information showing the modelled extent of</a></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
				Plan to help identify, at a property level, whether the site may be subject to flooding.	<a href="#">flooding affecting specific properties in its GIS viewer. The maps are non-statutory and can be reviewed to take account of any property-specific information.</a>
182.	Chapter 14H Natural Hazards	Policy 14H 1.7 New residential units, commercial activities or retail activities within the Stream Corridors of the Flood Hazard Overlays	Support in part	<p>Kāinga Ora supports this policy, but seeks amendment to the policy chapeau to remove reference to the flood hazard overlay.</p> <p>Kāinga Ora also seeks the inclusion of a note at the end of the policy, which makes reference to flood hazard maps that sit outside of the Plan to help identify, at a property level, whether the site may be subject to flooding.</p>	<p><a href="#">Policy 14H 1.7 New residential units, commercial activities or retail activities within the Stream Corridors of the Flood Hazard Overlays</a></p> <p>...</p> <p><a href="#">Note: The Council holds publicly available information showing the modelled extent of flooding affecting specific properties in its GIS viewer. The maps are non-statutory and can be reviewed to take account of any property-specific information.</a></p>
183.	Chapter 14H Natural Hazards  14H 2 - Rules	Rule 14H 2.2 Additions to residential buildings in the Inundation Area, Overland Flow Path or Stream Corridor Flood Hazard Overlays	Support in part	<p>Kāinga Ora seeks amendment to the chapeau to remove reference to the flood hazard overlay.</p> <p>In addition, Kāinga Ora generally supports the intent of the rule, but seeks simplification of the rule framework to reflect the risk</p>	<p><a href="#">Rule 14H 2.2 Additions to residential buildings in the Inundation Area, Overland Flow Path or Stream Corridor Flood Hazard Overlays</a></p> <p>1. <a href="#">Additions to residential buildings that are within the Inundation Area, Overland Flow Path or Stream Corridor Flood</a></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
				<p>management approach – such that additions in an Inundation Area are Permitted, subject to meeting minimum FFL, otherwise RDIS. Additions within an Overland Flowpath are automatically RDIS, and additions within a Stream Corridor are automatically NC.</p> <p>Kāinga Ora seeks correction of an incorrect rule reference at 14H 2.2.2(a).</p> <p>Kāinga Ora also seeks the inclusion of a note at the end of the policy, which makes reference to flood hazard maps that sit outside of the Plan to help identify, at a property level, whether the site may be subject to flooding.</p>	<p><u>Hazard Overlays are permitted activities where:</u></p> <p>a. <u>When located within an Inundation Area of the Flood Hazard Overlay, the finished floor levels of the additions are located above the 1% Flood Annual Exceedance Probability Level, where the finished floor level is to the bottom of the floor joists or the base of the concrete floor slab;</u> and</p> <p><del>b. The additions are not located within the Overland Flow Path Overlay; and</del></p> <p><del>c. The additions are not located within the Stream or River Corridor Overlay.</del></p> <p>2. <u>Additions to residential buildings that are within the Inundation Area, Overland Flow Path or Stream Corridor Flood Hazard Overlays are restricted discretionary activities where:</u></p> <p>a. <u>Compliance with the requirements of 14H 2.24(1)(a) cannot be achieved.</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
					<p><u>Matters of discretion are restricted to:</u>  <u>1. The matters in 14H 1.3.</u></p> <p>3. <u>Additions to residential buildings that are in the <del>Inundation Area, Overland Flow Path or Stream Corridor Flood Hazard</del> <del>Overlays</del> are restricted discretionary activities where:</u>  <u>a. <del>Compliance with the requirements of 14H 2.4(1)(b) cannot be achieved</del></u></p> <p><u>Matters of discretion are restricted to:</u>  <u>1. The matters in 14H 1.4.</u></p> <p>4. <u>Additions to residential buildings that are in the <del>Inundation Area, Overland Flow Path or Stream Corridor Flood Hazard</del> <del>Overlays</del> are non-complying activities where:</u>  <u>a. <del>Compliance with the requirements of 14H 2.2(1)(c) cannot be achieved.</del></u></p> <p><u>Note: The Council holds publicly available information showing the modelled extent of flooding affecting specific properties in its GIS</u></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
					<a href="#">viewer. The maps are non-statutory and can be reviewed to take account of any property-specific information.</a>
184.	Chapter 14H Natural Hazards  14H 2 - Rules	Rule 14H 2.3 New residential units, commercial activities or retail activities in the Inundation Area of the Flood Hazard Overlay	Support in part	<p>Kāinga Ora supports this rule framework, but seeks amendment to remove reference to the flood hazard overlay.</p> <p>Kāinga Ora also seeks the inclusion of a note at the end of the policy, which makes reference to flood hazard maps that sit outside of the Plan to help identify, at a property level, whether the site may be subject to flooding.</p>	<p><a href="#">Rule 14H 2.3 New residential units, commercial activities or retail activities in the Inundation Area of the Flood Hazard Overlay</a></p> <p>1. <a href="#">New residential units, commercial activities or retail activities that are within the Inundation Area of the Flood Hazard Overlay are permitted activities where:</a></p> <p>a. <a href="#">When located within an Inundation Area of the Flood Hazard Overlay, †The finished floor levels of the building for the Potentially Hazard Sensitive Activity are located above the 1% Flood Annual Exceedance Probability Level, including an allowance for freeboard, where the finished floor level is to the bottom of the floor joists or the base of the concrete floor slab.</a></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
					<p>2. <u>New residential units, commercial activities or retail activities that are within the Inundation Area of the Flood Hazard Overlay are restricted discretionary activities where:</u></p> <p><u>Compliance with the requirements of 14H 2.3(1)(a) cannot be achieved.</u></p> <p><b><u>Matters of discretion are restricted to:</u></b></p> <p><u>1. The impact from the 1% Annual Exceedance Probability flood is low due to either the:</u></p> <ul style="list-style-type: none"> <li>• <u>implementation mitigation measures;</u></li> <li>• <u>the shallow depth of the flood waters within the building; or</u></li> <li>• <u>type of activity undertaken within the building; and</u></li> <li>• <u>The risk to people and property is reduced or not increased.</u></li> </ul> <p><u>Note: The Council holds publicly available information showing the modelled extent of flooding affecting specific properties in its GIS viewer. The maps are non-statutory and can</u></p>



ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
					<a href="#">be reviewed to take account of any property-specific information.</a>
185.	Chapter 14H Natural Hazards  14H 2 - Rules	Rule 14H 2.4 New residential units, commercial activities or retail activities that are within the Overland Flowpaths of the Flood Hazard Overlay	Support in part	<p>Kāinga Ora supports this rule framework, but seeks amendment to remove reference to the flood hazard overlay.</p> <p>Kāinga Ora also seeks the inclusion of a note at the end of the policy, which makes reference to flood hazard maps that sit outside of the Plan to help identify, at a property level, whether the site may be subject to flooding.</p>	<p><a href="#">Rule 14H 2.4 New residential units, commercial activities or retail activities that are within the Overland Flowpaths of the Flood Hazard Overlay</a></p> <p>1. <a href="#">New residential units, commercial activities or retail activities that are within the Overland Flowpaths of the Flood Hazard Overlay are restricted discretionary activities.</a></p> <p><b>Matters of discretion are restricted to:</b></p> <p>1. <a href="#">The matters in 14H 1.6.</a></p> <p><a href="#">Note: The Council holds publicly available information showing the modelled extent of flooding affecting specific properties in its GIS viewer. The maps are non-statutory and can be reviewed to take account of any property-specific information.</a></p>



ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
186.	Chapter 14H Natural Hazards  14H 2 - Rules	Rule 14H 2.5 New residential units, commercial activities or retail activities that are within the Stream Corridors of the Flood Hazard Overlay	Support in part	<p>Kāinga Ora supports this rule framework, but seeks amendment to remove reference to the flood hazard overlay.</p> <p>Kāinga Ora also seeks the inclusion of a note at the end of the policy, which makes reference to flood hazard maps that sit outside of the Plan to help identify, at a property level, whether the site may be subject to flooding.</p>	<p><u><a href="#">Rule 14H 2.5 New residential units, commercial activities or retail activities that are within the Stream Corridors of the Flood Hazard Overlay</a></u></p> <p>1. <u><a href="#">New residential units, commercial activities or retail activities that are within the Stream Corridors of the Flood Hazard Overlay are non-complying activities.</a></u></p> <p><u><a href="#">Note: The Council holds publicly available information showing the modelled extent of flooding affecting specific properties in its GIS viewer. The maps are non-statutory and can be reviewed to take account of any property-specific information.</a></u></p>
<b>Chapter 14M – Wind</b>					
187.	14M - Wind	Entire chapter	Support in Part	Kāinga Ora supports a well-functioning and safe urban environment. However, Kāinga Ora seeks adjustments at the point at which wind assessments are required and/or resource consent is necessary. Kāinga Ora seeks an	<p><i>Amend the height limit at which point a wind assessment and/or resource consent is required to 20m.</i></p> <p><i>Adjust rule framework so resource consent is required as a restricted discretionary activity</i></p>

ID	Section of Plan	Specific Provision	Support/ Support in Part/Oppose	Reasons	Relief Sought
				<p>increase in this threshold to apply only to development in excess of 20m.</p> <p>Kāinga Ora also considers that an alternative method could be utilised to assess effects of wind on the safety of the pedestrian public realm, which could include assessment of wind effects as a listed matter of discretion in the zone based rules for development that is in excess of 20m.</p> <p>Beyond the above matters, Kāinga Ora seeks that any rule framework requiring the consideration of wind effects is a restricted discretionary activity, as the matters of discretion should be able to be identified for such an assessment.</p>	<p><i>for any breach to relevant to wind conditions/standards.</i></p> <p><i>Make all necessary consequential changes to reflect these changes.</i></p>

## **Appendix 2: Maps**

The following maps set out the amendments sought from Kāinga Ora to Proposed Plan Change 56 to the Operative Hutt City District Plan.

**Public Transport**

-  Train Station
-  Railway

**Kāinga Ora Proposed Changes Sought**

 Height Variation Control

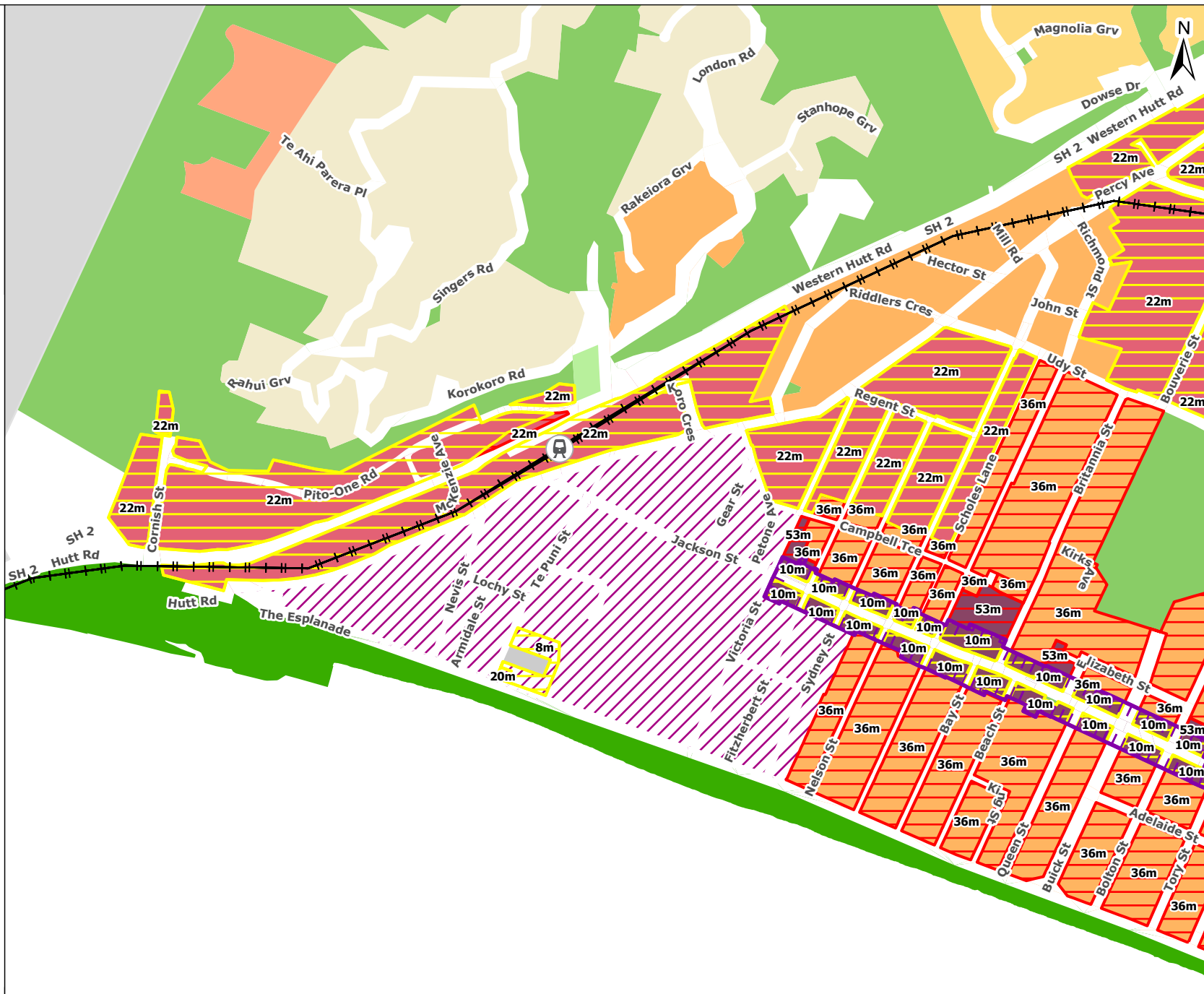
**Proposed District Plan Zones (Plan Change 56)**

 Jackson Street Heritage Precinct

 Height Variation Control

**Zones**

-  Community Iwi
-  General Business
-  General Recreation
-  General Residential
-  Hill Residential
-  Landscape Protection
-  Medium Density Residential
-  High Density Residential
-  Passive Recreation
-  Petone Commercial - Area 1
-  Petone Commercial - Area 2
-  Special Recreation

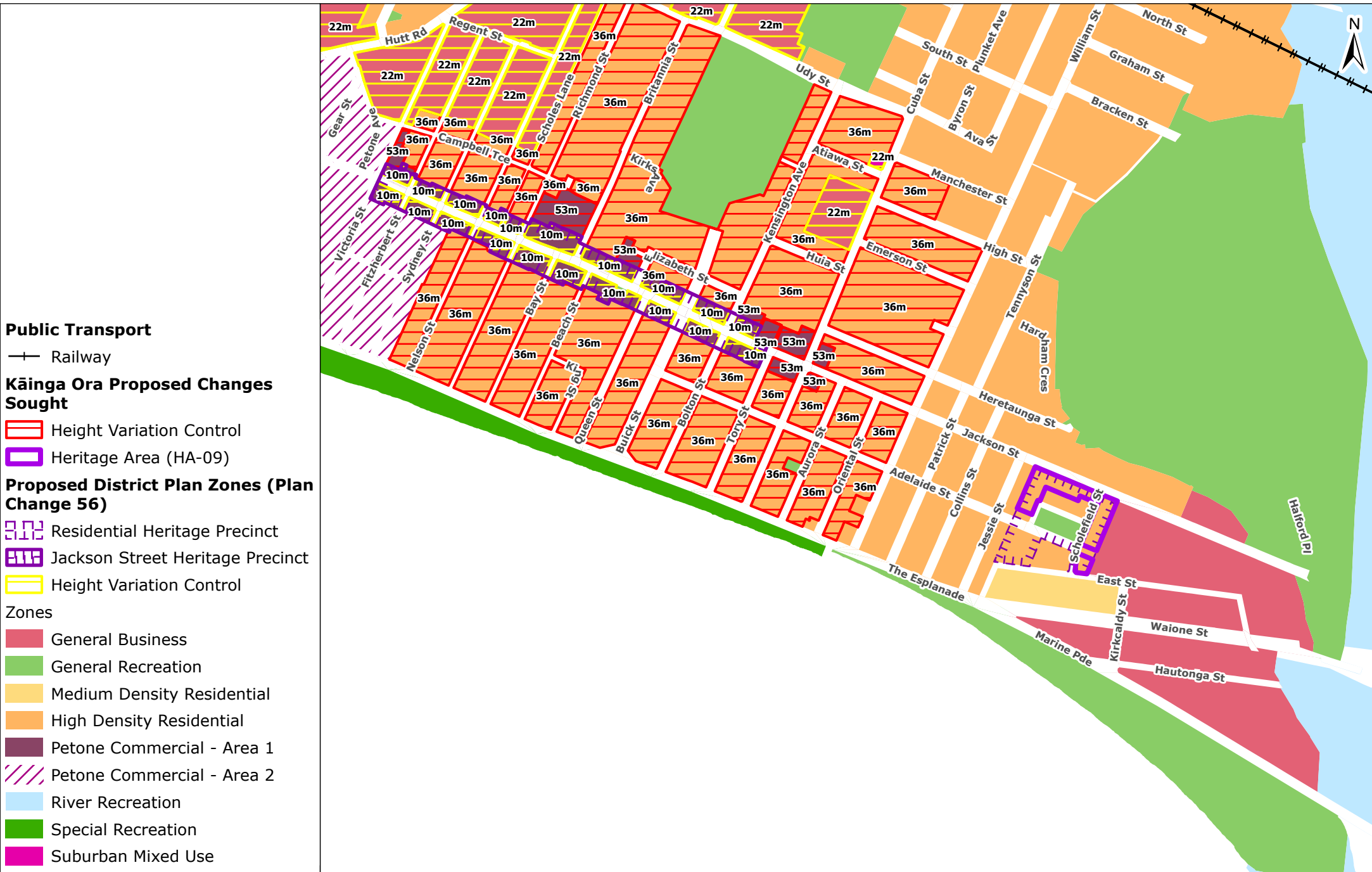


Imagery sourced from: LINZ Data Services  
 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.  
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator  
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Petone (West)

PREPARED BY	TPG REF. 718449
Conor McIntosh	SHEET 1 OF 13
DATE 20/09/2022	A4 Scale 1:10,000
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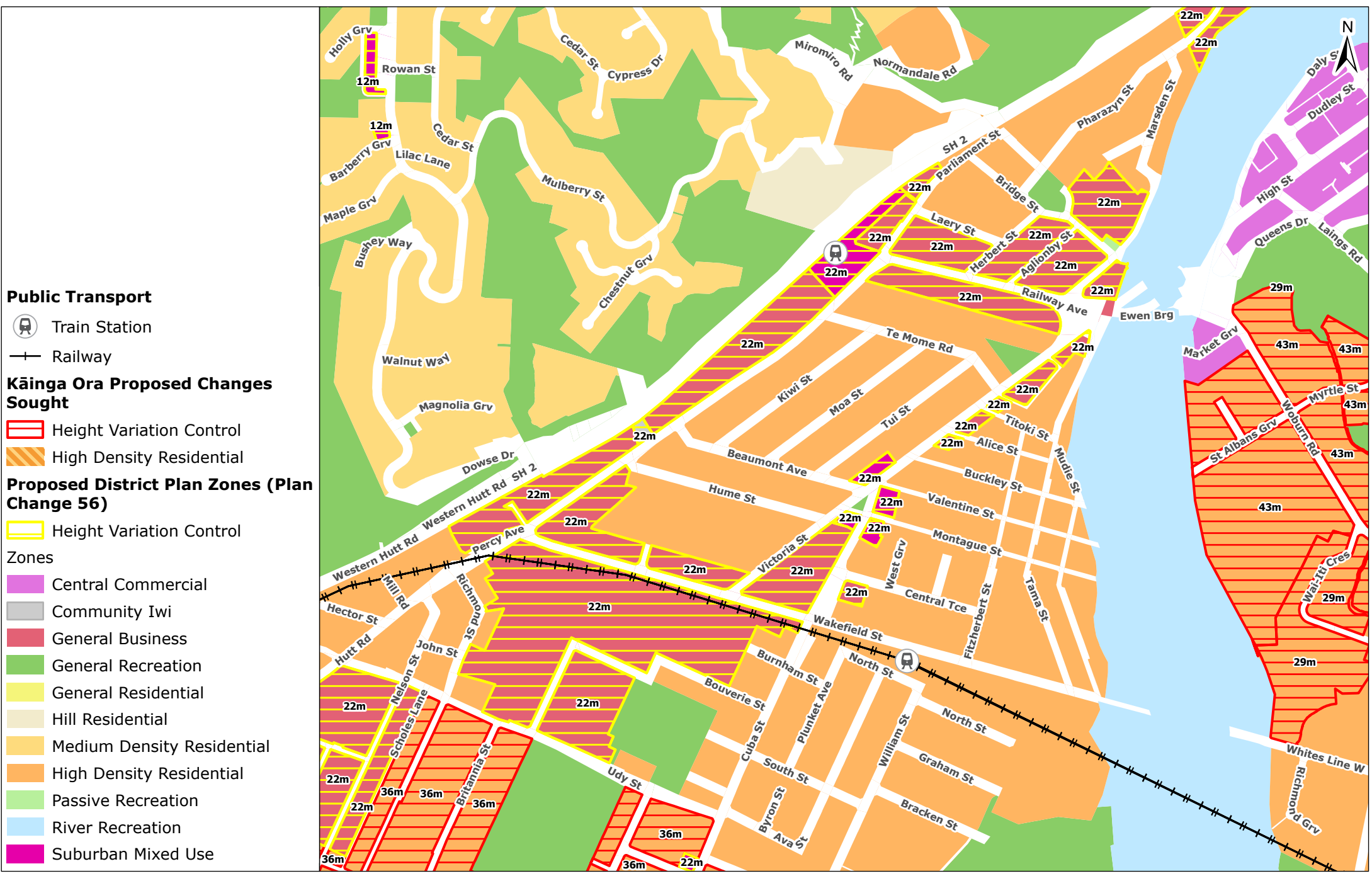


Imagery sourced from: LINZ Data Services  
 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.  
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator  
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Petone (East)

PREPARED BY	TPG REF. 718449
Conor McIntosh	SHEET 2 OF 13
DATE 20/09/2022	A4 Scale 1:10,000
0	260 Metres



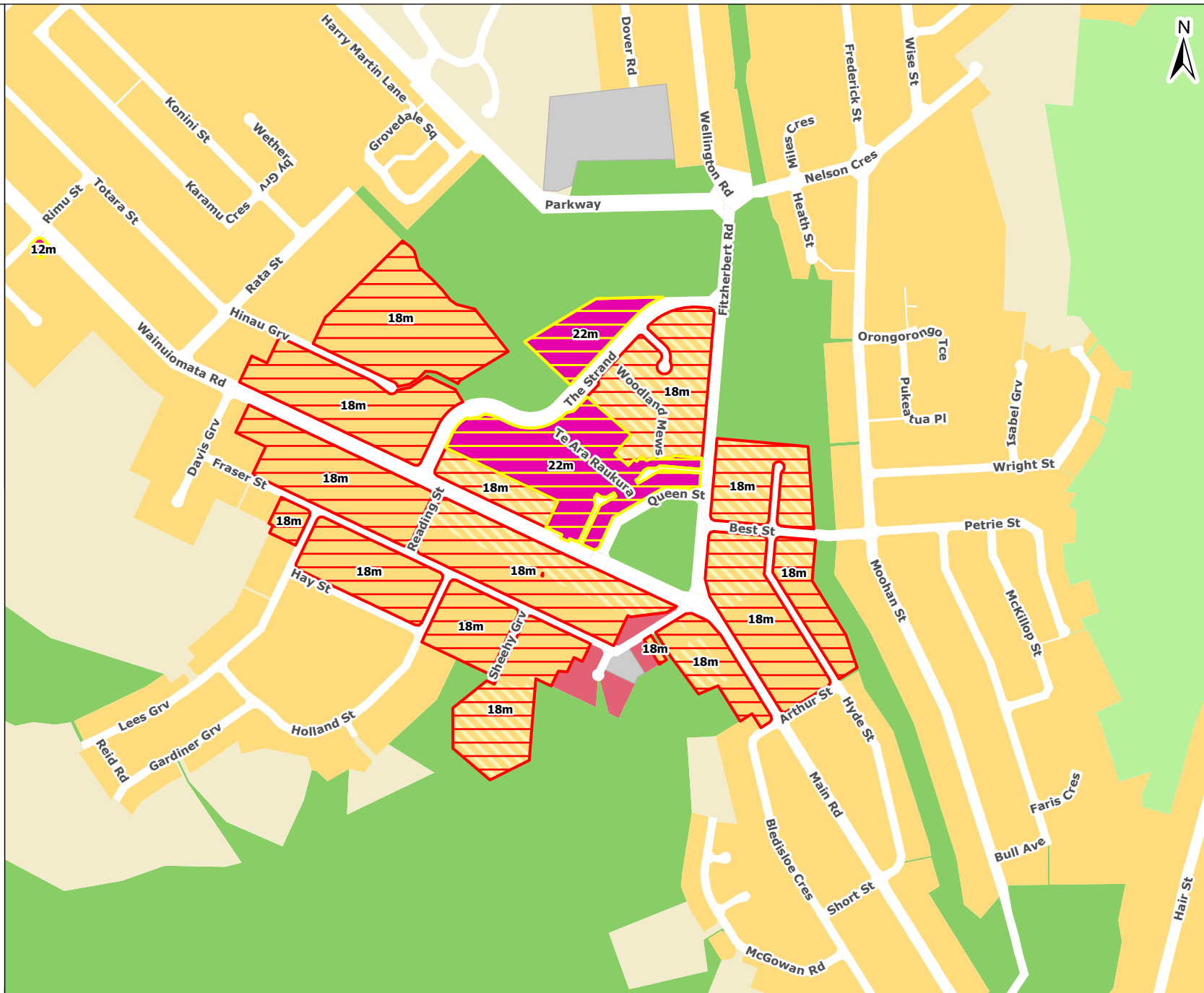


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 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.  
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator  
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Alicetown

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Conor McIntosh	718449
DATE	SHEET
20/09/2022	3 OF 13
A4 Scale 1:10,000	
0 260 Metres	





**Kāinga Ora Proposed Changes Sought**

- Height Variation Control
- Medium Density Residential

**Proposed District Plan Zones (Plan Change 56)**

- Height Variation Control
- Zones**
- Community Iwi
- General Business
- General Recreation
- General Residential
- Hill Residential
- Medium Density Residential
- High Density Residential
- Passive Recreation
- Suburban Mixed Use

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 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.  
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator  
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Wainuiomata



PREPARED BY	TPG REF. 718449
Conor McIntosh	SHEET 4 OF 13
DATE 20/09/2022	A4 Scale 1:10,000

**Kāinga Ora**  
Homes and Communities











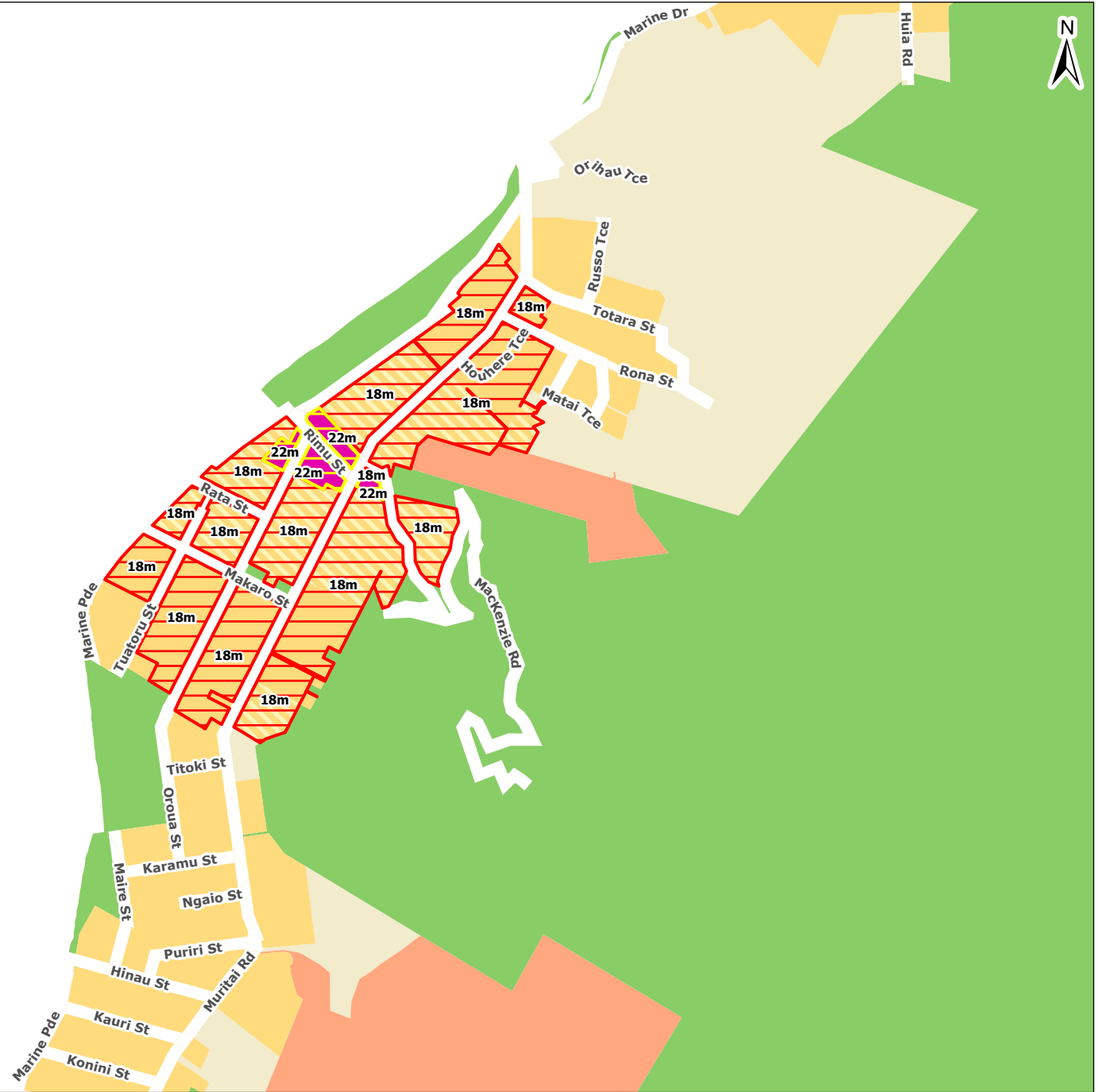


### Kāinga Ora Proposed Changes Sought

-  Height Variation Control
-  Medium Density Residential

### Proposed District Plan Zones (Plan Change 56)

-  Height Variation Control
- Zones**
-  General Recreation
-  General Residential
-  Hill Residential
-  Landscape Protection
-  Medium Density Residential
-  High Density Residential
-  Suburban Mixed Use





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 Coordinate System: NZGD 2000 New Zealand Transverse Mercator  
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Eastbourne



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Conor McIntosh	SHEET	5 OF 13
DATE	20/09/2022	
		A4 Scale 1:10,000
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**Public Transport**

-  Train Station
-  Railway

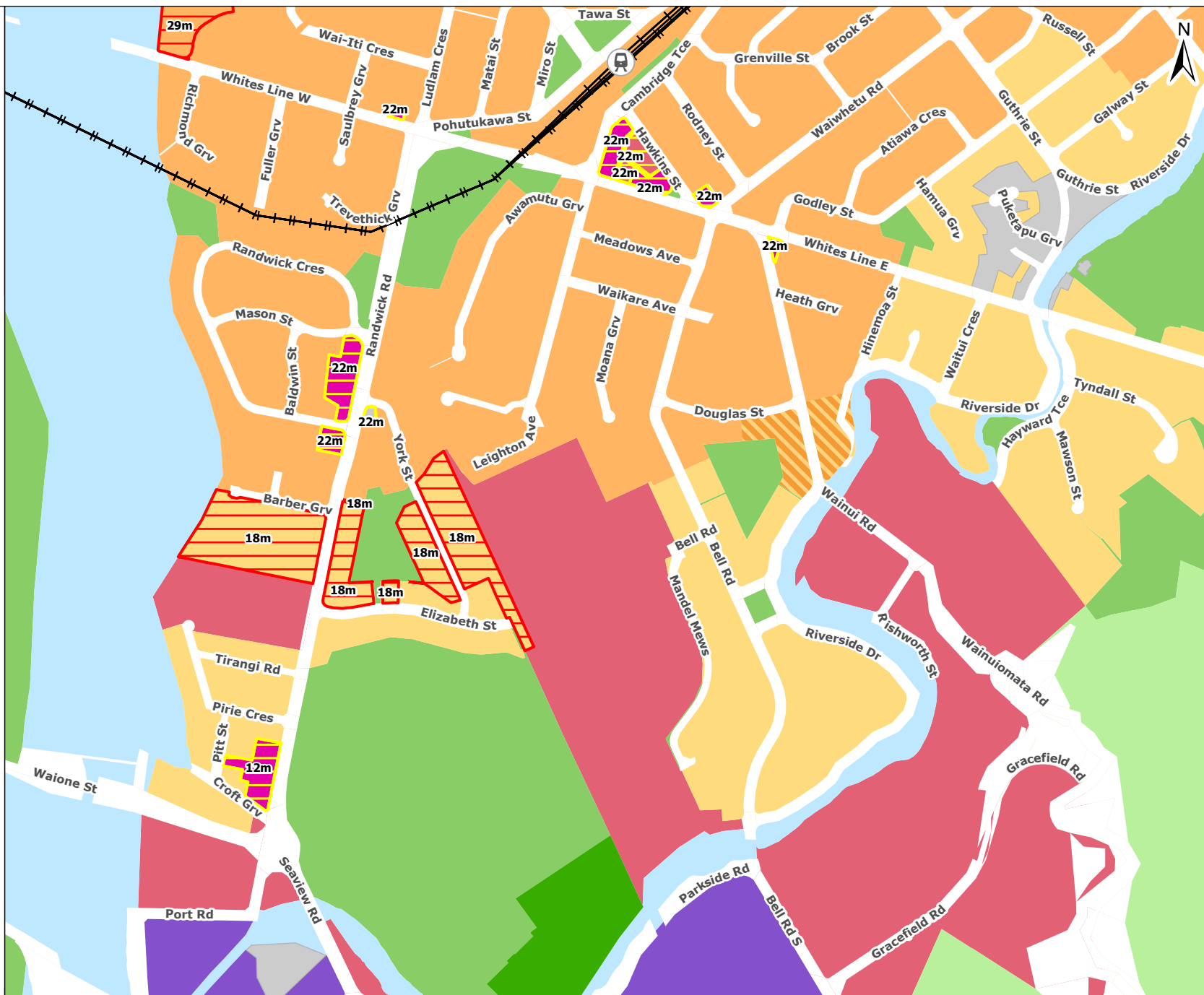
**Kāinga Ora Proposed Changes Sought**

-  Height Variation Control
-  High Density Residential

**Proposed District Plan Zones (Plan Change 56)**

-  Height Variation Control
- Zones

-  Community Iwi
-  General Business
-  General Recreation
-  General Residential
-  Medium Density Residential
-  High Density Residential
-  Passive Recreation
-  River Recreation
-  Special Business
-  Special Recreation
-  Suburban Commercial
-  Suburban Mixed Use





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 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.  
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator  
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Moera/Waiwhetu





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20/09/2022	6 OF 13
A4 Scale 1:10,000	
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**Public Transport**

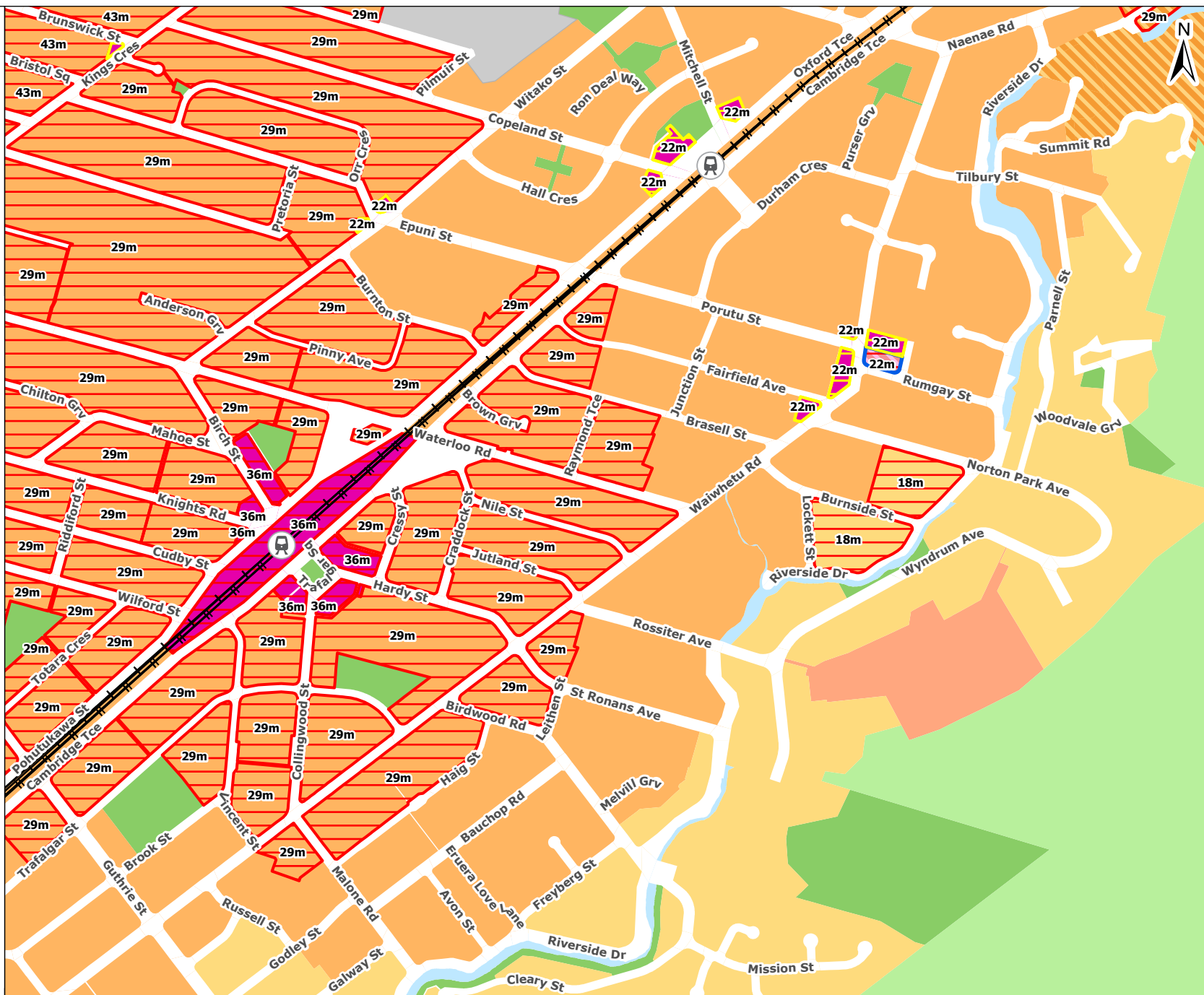
-  Train Station
-  Railway

**Kāinga Ora Proposed Changes Sought**

-  Height Variation Control
-  Centre Expansion
-  Suburban Mixed Use
-  High Density Residential

**Proposed District Plan Zones (Plan Change 56)**

-  Height Variation Control Zones
-  Central Commercial
-  Community Health
-  General Recreation
-  General Residential
-  Landscape Protection
-  Medium Density Residential
-  High Density Residential
-  Passive Recreation
-  River Recreation
-  Suburban Mixed Use



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 Coordinate System: NZGD 2000 New Zealand Transverse Mercator  
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Waterloo Station/Fairfield

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Conor McIntosh	718449
DATE	SHEET
20/09/2022	7 OF 13
A4 Scale 1:10,000	
0 260 Metres	





**Public Transport**

- Train Station
- Railway

**Kāinga Ora Proposed Changes Sought**

Height Variation Control

**Proposed District Plan Zones (Plan Change 56)**

Height Variation Control

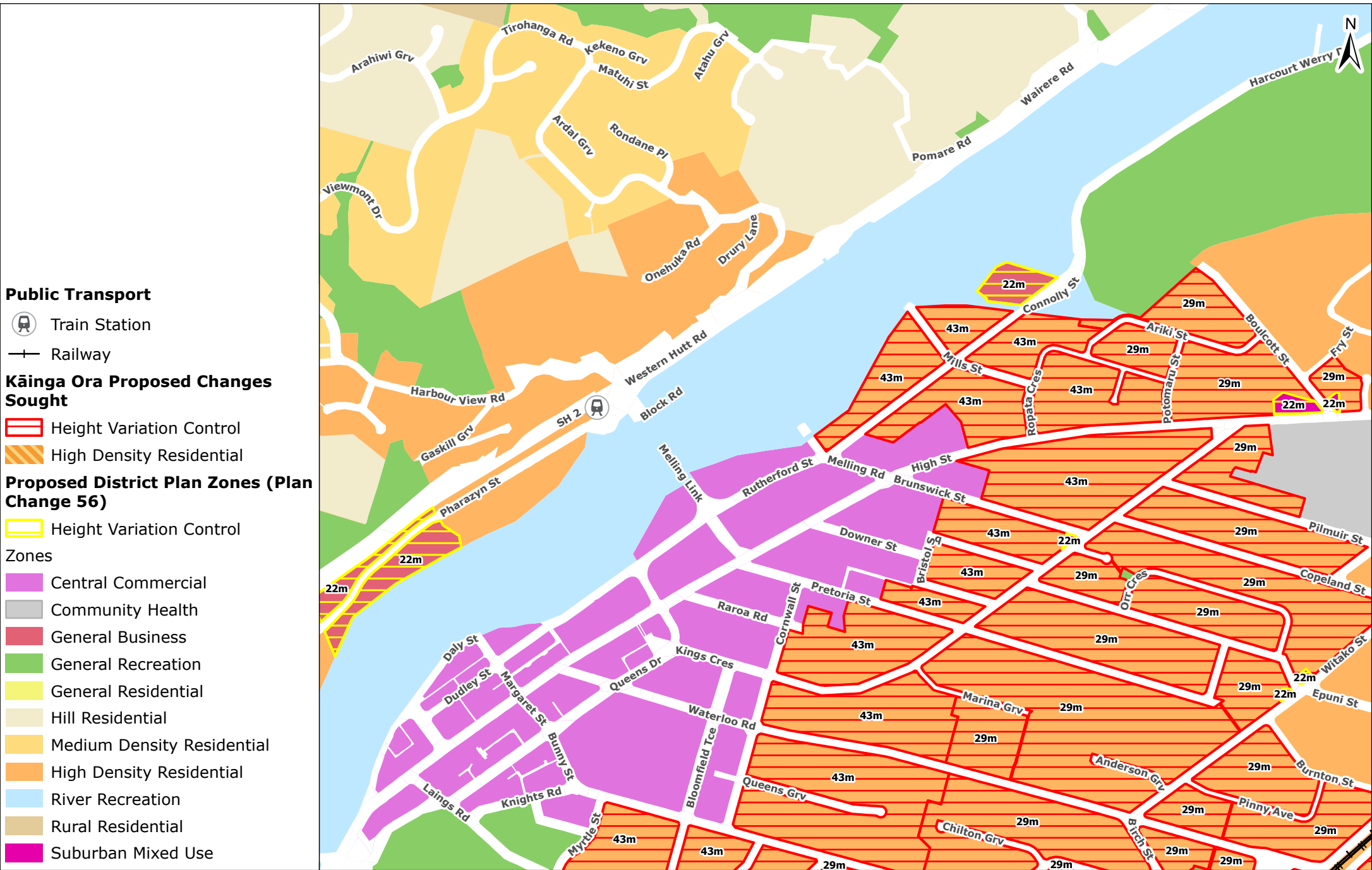
- Zones**
- Central Commercial
  - Community Health
  - General Business
  - General Recreation
  - Medium Density Residential
  - High Density Residential
  - River Recreation
  - Suburban Mixed Use

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 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.  
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator  
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Hutt City (South)/Waterloo

PREPARED BY	TPG REF: 718449
Conor McIntosh	SHEET 8 OF 13
DATE 20/09/2022	A4 Scale 1:10,000
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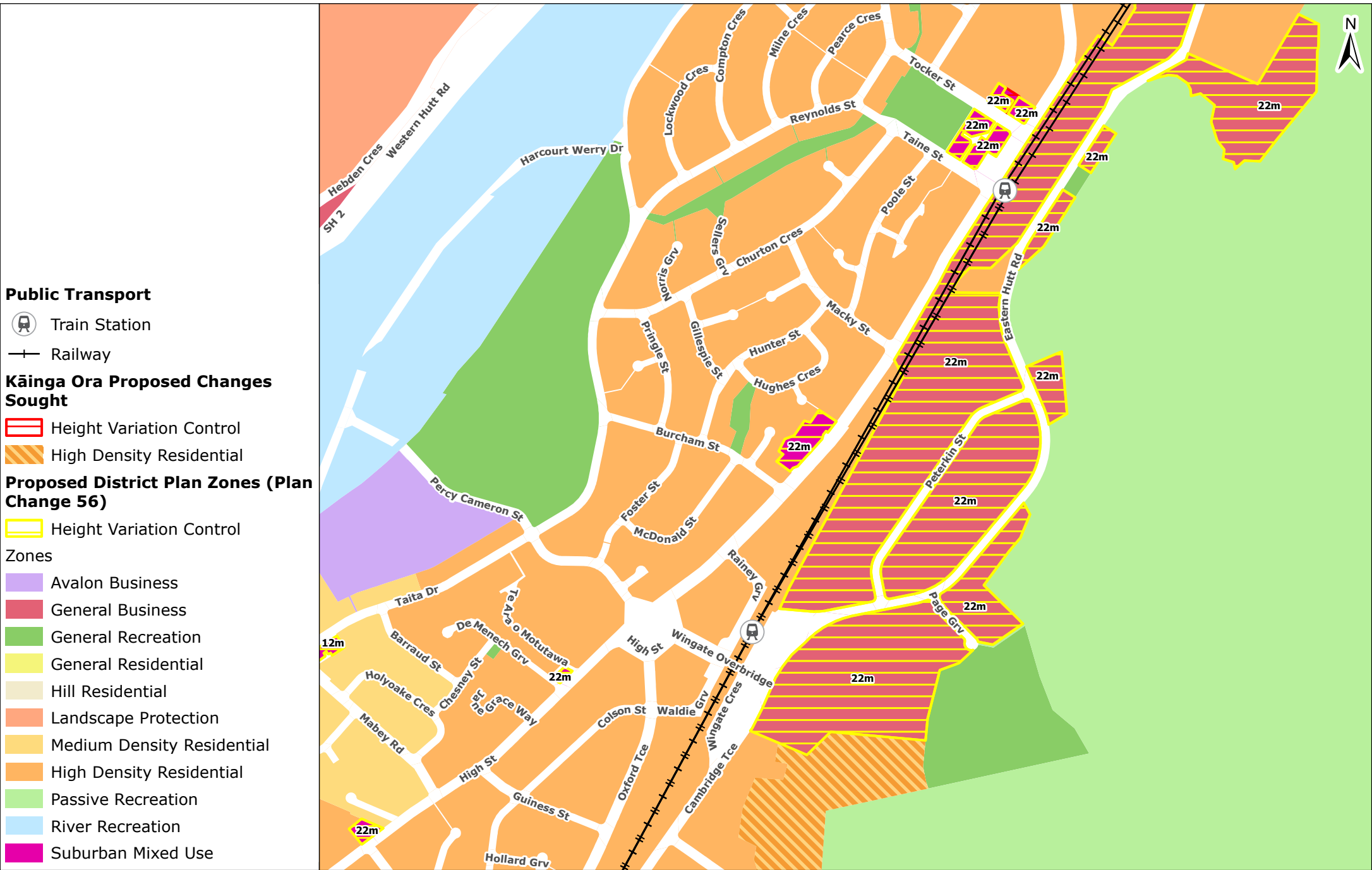
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 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Hutt City (North)

PREPARED BY	TPG REF.
Conor McIntosh	718449
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A4 Scale 1:10,000	
0 260 Metres	









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 Coordinate System: NZGD 2000 New Zealand Transverse Mercator Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

Centre: Wingate/Taita



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Conor McIntosh	SHEET 11 OF 13
DATE 20/09/2022	A4 Scale 1:10,000
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




**Public Transport**

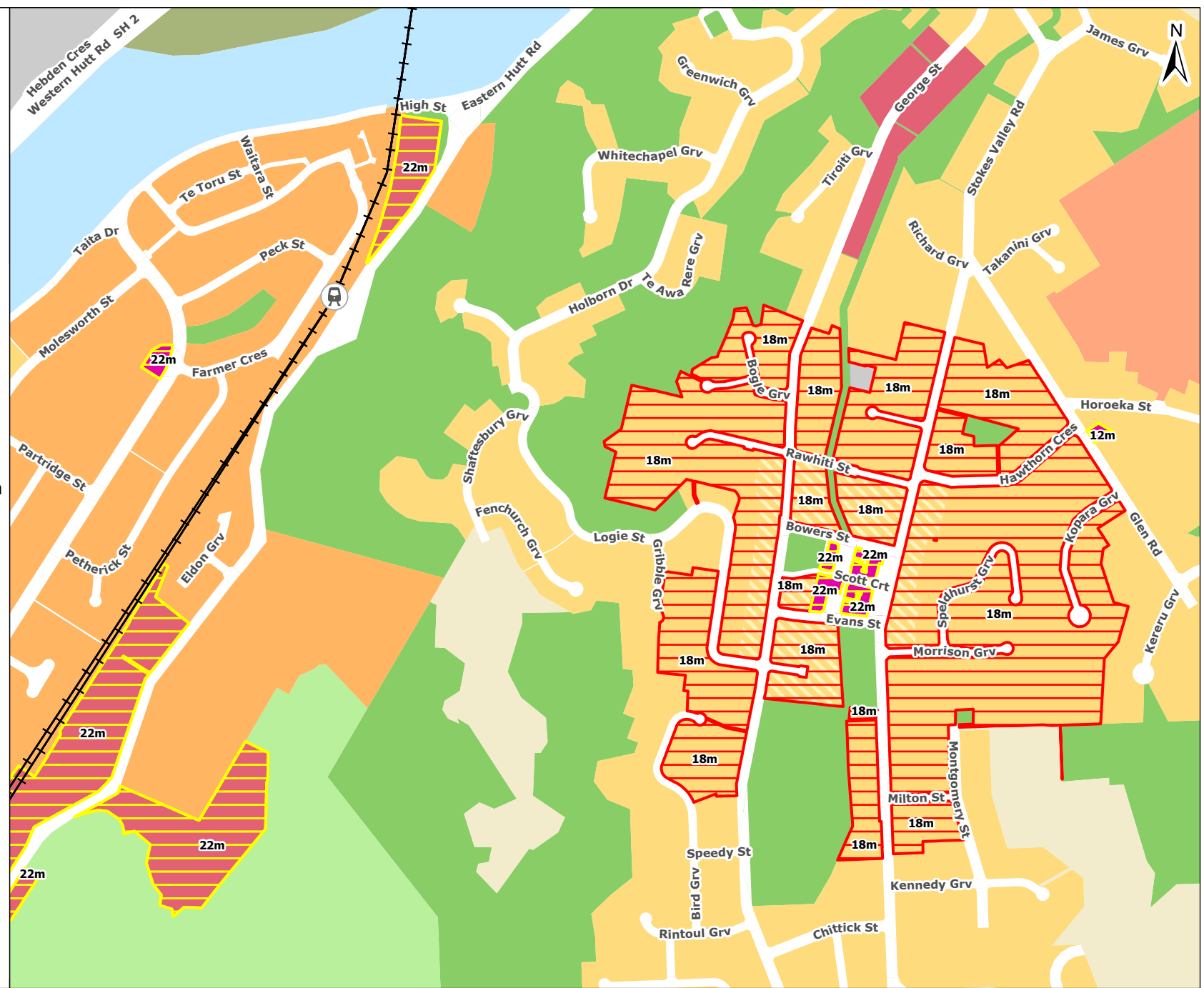
-  Train Station
-  Railway

**Kāinga Ora Proposed Changes Sought**

-  Height Variation Control
-  Medium Density Residential

**Proposed District Plan Zones (Plan Change 56)**

-  Height Variation Control
- Zones**
-  Community Iwi
-  Extraction
-  General Business
-  General Recreation
-  General Residential
-  General Rural
-  Hill Residential
-  Landscape Protection
-  Medium Density Residential
-  High Density Residential
-  Passive Recreation
-  River Recreation
-  Suburban Mixed Use



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 Coordinate System: NZGD 2000 New Zealand Transverse Mercator  
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).



Centre: Stokes Valley

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DATE 20/09/2022	A4 Scale 1:10,000
0 260 Metres	





**Public Transport**

-  Train Station
-  Railway

**Proposed District Plan Zones (Plan Change 56)**

 Height Variation Control

**Zones**

-  Extraction
-  General Business
-  General Recreation
-  General Residential
-  General Rural
-  Hill Residential
-  Landscape Protection
-  Medium Density Residential
-  High Density Residential
-  Passive Recreation
-  River Recreation
-  Suburban Mixed Use



Centre: Manor Park

Imagery sourced from: LINZ Data Services  
 Property boundaries sourced from Land Information NZ. Crown Copyright reserved. Property boundaries accuracy: +/-1m in urban areas, +/-30m in rural areas.  
 Coordinate System: NZGD 2000 New Zealand Transverse Mercator  
 Datum: NZGD 2000 // This map was produced with ArcGIS Pro (Esri).

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