

**12 September 2022**

Attn: District Planning Team  
Wellington City Council  
PO Box 2199  
Wellington 6140

*Submission by email via: [PDPsubmissions@wcc.govt.nz](mailto:PDPsubmissions@wcc.govt.nz)*

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON THE WELLINGTON CITY PROPOSED DISTRICT PLAN UNDER CLAUSE 6 OF SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991**

**This is a submission by Kāinga Ora - Homes and Communities (“Kāinga Ora”) on the Wellington City Proposed District Plan (“PDP” or “the Plan”) from Wellington City Council (“the Council”):**

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:**

The Wellington City Proposed District Plan (“PDP”) in its entirety.

## 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 the PDP and how it:
  - i. 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**”);
  - ii. Minimises barriers that constrain the ability to deliver housing development across the public housing, affordable housing, affordable rental, and market housing; and
  - iii. 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 PDP in the following topic areas:
  - i. **Part 1 – Definitions** – Amendments sought to ensure residential development is not unnecessarily encumbered via classification of residential development as different activities, including multi-unit housing and comprehensive development. Amendments are sought to the Definition of Natural Hazard overlay to address the static nature of flood mapping.

- ii. **Part 2 – Strategic Direction** – Amendments sought to the proposed Centres hierarchy to better align with national and regional direction, align the proposed centres hierarchy with the role current and future role and function of centres within the urban environment, along with general changes to better reflect the need for well-functioning urban environments and the need to treat identified capacity as a minimum rather than a target.
- iii. **Part 2 – Energy, Infrastructure and Transport** – Amendments sought to Three Waters, Infrastructure and Transport chapters for plan clarity and technical improvements, make the provisions more workable through appropriate grouping, clarify reverse sensitivity issues, and clarify that development may require additional infrastructure funding.
- iv. **Part 2 – Hazards and Risks – Natural Hazards** – Amendments sought to adjust consent thresholds to reflect hazard risk and remove reference to static overlay maps.
- v. **Part 2 – Historic Heritage** – Amendments sought to recognise the role and function of the Zone the heritage buildings and structures are located in and enable a wider range of new buildings and structures that are located towards the rear of the site.
- vi. **Part 2 – Character Areas** – Amendments sought to introduce a Character Areas chapter that will apply as an overlay and apply District-wide, as opposed to in the Medium Density Residential Zone as notified.
- vii. **Part 2 – Subdivision** – Amendments sought to provide more design and density flexibility ensure the effects of vacant lot subdivision are managed more appropriately, remove the provision for legal instruments and the addition of notification preclusion statements for Restricted Discretionary Activities.
- viii. **Part 2 – General District-Wide Matters**
  - i. **Coastal Environment** – amendments sought focussing on the risk to people rather than property and amendments to consent thresholds to be clearer and more enabling.

- ii. **Earthworks** – Amendments sought to focus on the appearance of natural landforms and adverse effects more generally rather than visual amenity values.
  - iii. **Noise** – Amendments sought to clarify reverse sensitivity matters and add a notification preclusion for noise rules. Amendments are sought to ensure noise exposure from Airport operations are appropriate.
  - iv. **Wind Rules** – Amendments sought to align with revised height limits sought in Centres in this submission and are applied to the High Density Residential Zone.
- ix. **Part 3 – Residential Zones**
- i. **Medium Density Residential Zone (“MRZ”)** – Amendments sought to expand design flexibility, recognise the planned urban built form, simplify provisions, alter reference to multi-unit housing and Design Guides, increase height limits when proximate to a Local Centre Zone, and remove Character Precincts within the chapter and as a qualifying matter.
  - ii. **High Density Residential Zone (“HRZ”)** – Amendments sought to expand design flexibility, increase spatial application of the zone, recognise the planned urban built form, simplify provisions, alter reference to multi-unit housing and Design Guides, and increase height limits when proximate to the City Centre Zone, Metropolitan and Town Centre Zone (as sought by Kāinga Ora in this submission).
- x. **Part 3 – Commercial and Mixed Use Zones**
- i. **Centre Zones** – Amendments sought to refine the centres hierarchy, including the introduction of a Town Centre Zone in Miramar, Newtown, and Tawa; expand design flexibility, planned urban built form, development density and height/daylight expectations, and changes to height limits and spatial extent of some centres.
  - ii. **Mixed Use Zone** – Amendments sought to generally improve design flexibility and increase height where appropriate.

- xi. **Part 3 – Development Areas** – Amendments sought to up zone the Medium Density Residential properties in the Kilbirnie Bus Barns Development Area to HRZ, consistent with amendments sought in this submission to upzone land within a walkable catchment of Kilbirnie Metropolitan Centre to HRZ. Changes are also sought to alter reference to multi-unit housing and Design Guides, provide notification preclusion statements, and seek zoning now in the Lincolnshire Farm and Upper Stebbings/Glenside West Development Areas.
  - xii. **Part 3 – Special Purpose Zones – Future Urban Zone** – The Future Urban Zone applies to two Development Areas, one being Lincolnshire Farm and the other being Upper Stebbings and Glenside West. It is unclear why a Future Urban Zone is required on this land given that detailed Development Areas have been undertaken for these areas and they have been planned for some time. Deletion of the Future Urban Zone is sought.
  - xiii. **Part 3 – Designations – Wellington International Airport Limited (“WIAL”)** – Amendments sought to clarify height limits in areas surrounding the Airport particularly within the Transitional Surface Area.
  - xiv. **Part 4 – Appendices and Schedules – Design Guides** - Amendments sought to delete Design Guides as statutory documents within the District Plan. Subsequent amendments are sought in zone provisions to define the design outcomes that the District Plan is seeking to achieve.
5. Kāinga Ora has an interest to ensure national and regional consistency in resource management documents across the Wellington Region. From reviewing the plan changes/reviews and associated s32 documentation from the Councils in the Wellington Region, it is apparent that there is inconsistency in application of District Plan frameworks. Accordingly, Kāinga Ora submits that Council should align the PDP with other regional planning documents ahead of the hearings for those documents. Kāinga Ora seeks that the hearing process for the PDP 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 that was notified after the PDP. 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 PDP and there appears to be misalignment between other plans of the region.

6. 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, and 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.
7. The Kāinga Ora submission points and changes sought can be found within Table 1 of **Appendix 1** which forms the bulk of the submission.
8. A proposed Town Centre Zone Chapter is sought and included in **Appendix 2**.
9. The New Character Areas Overlay Chapter is attached at **Appendix 3**.
10. Mapping changes sought are included in **Appendix 4**.

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

That the specific amendments, additions, or retentions which are sought as specifically outlined in **Appendix 1- 4**, with text changes shown in red and are struck through or underlined, are accepted and adopted into the Wellington City Proposed District Plan, 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 the Wellington City Proposed District Plan to address the matters raised in its submission.



**Brendon Liggett**  
**Development Planning Manager**  
**Kāinga Ora – Homes and Communities**

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## **Appendix 1: Decisions sought Wellington City Proposed District Plan**

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

*Proposed changes 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>ALL OF PLAN</b>					
1.	District Plan Wide	Centres Hierarchy and Scale	Support in Part	<p>Kāinga Ora generally supports the approach to implement the NPSUD and the Housing Supply Act by incorporating a Centres hierarchy and intensification provisions into the PDP.</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 Wellington Region’s Centres hierarchy and intensification provisions is considered necessary given the broad range of approaches taken across the Wellington Region.</p> <p>Examples are provided throughout this submission and include misalignment with National Planning Standard definitions for centres and the notification timing of the PDP</p>	<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 along with the Medium Density Residential and High Density Residential Zones to improve national and regional consistency and increase density and heights across the board.</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, and where necessary introduce a new chapter.</li> <li>3. Kāinga Ora seeks that notified Local Centres in Miramar, Tawa and Newtown are classified as Town Centre zones for their role and function within Wellington City. Kāinga Ora also seeks expansion of the spatial extent of these and other centres to support the plan-enabled residential intensification surrounding them to and support a well-functioning urban environment. Relief sought for spatial extent of</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>with other district plans and PC1 to the Regional Policy Statement. There is also a lack of explanation in the S32 documentation for a number of changes relating to the matters above and general bulk and location standards across the PDP.</p> <p>Amendments sought to spatial extent and hierarchy of some centres, and heights enabled.</p>	<p>zones is shown in Appendix 4. Relief sought to new proposed Town Centre chapter provisions in Appendix 2.</p> <p>4. Kāinga Ora seeks any consequential changes necessary across the PDP to address the matters raised above.</p>
2.	District Plan Wide	Walkable Catchments; Mapping Changes	Support in Part	<p>Kāinga Ora generally supports the intent of the PDP to provide intensification within walkable catchments but seeks that these are extended to better align with Policy 3 of the NPSUD.</p> <p>Indicative mapping changes are outlined in Appendix 4 based on walkable catchment analysis taking into consideration topography, amenities, and connectivity. Mapping changes are required to reflect amendments to the Centres hierarchy and a wider geographical spread of the High Density</p>	<ol style="list-style-type: none"> <li>1. Expand and seek for the High Density Residential Zone to apply to areas that extend:             <ol style="list-style-type: none"> <li>i. 15-20min/1500m walkable catchment from the edge of the City Centre Zone</li> <li>ii. 15min/800m walkable catchment from the edge of MCZ and from existing and planned rapid transit stops (including the Johnsonville Line)</li> <li>iii. 10 min/400-800m walkable catchment from Town Centre Zones.</li> </ol> </li> <li>2. Seek for additional height and intensification in the Medium Density Zone up to 5 storeys within 5 min/400m walkable catchment of Local Centre Zones.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Residential Zone to better achieve well-functioning urban environments and national and regional consistency.	<ol style="list-style-type: none"> <li>3. Seek to expand the geographical extent of centres and height limits, to better reflect their role and function in the Centres hierarchy.</li> <li>4. Accept all changes sought from Kāinga Ora to the planning maps as shown in Appendix 4.</li> <li>5. Other than the changes sought in this submission and in Appendix 4, retain the zoning as notified.</li> </ol>
3.	District Plan Wide	Character Precincts, Mt Victoria North Townscape Precinct and Oriental Bay Height Precinct	Oppose	<p>Kāinga Ora opposes the introduction of Character Precincts including, Mt Victoria North Townscape Precinct and Oriental Bay Height Precinct, within the Medium Density Residential Zone as notified and seek that the proposed provisions are reviewed in full, including the spatial extent.</p> <p>It is noted that the proposed Precincts have generally been applied as a qualifying matter under 771(j) to limit height and density in areas that would be subject to Policy 3 of the NPS-UD and MDRS. Kāinga</p>	<ol style="list-style-type: none"> <li>1. Kāinga Ora seeks a full review of the proposed provisions. Kāinga Ora considers that the s32 analysis has not sufficiently addressed the matters in s77L of the RMA and therefore may not meet threshold to be applied as qualifying matter as currently proposed.</li> <li>2. If the review finds that there is a need to continue to manage such values, then Kāinga Ora proposes that the PDP introduces a Character Areas chapter that will apply as an overlay as a District-wide matters and seeks:             <ol style="list-style-type: none"> <li>i. Delete all references to Character Precincts across the Plan and replace this with a</li> </ol> </li> </ol>

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				<p>Ora considers that the s32 analysis has not sufficiently addressed the matters in s77L of the RMA and therefore may not meet threshold to be applied as qualifying matter as currently proposed.</p> <p>Kāinga Ora seeks a full review of the proposed provisions. If the review finds that there is a need to continue to manage such values, then Kāinga Ora proposes that the PDP introduces a Character chapter that will apply as an overlay as a District-wide matter.</p>	<p>Character Areas Overlay Chapter as proposed in Appendix 3.</p> <ul style="list-style-type: none"> <li>ii. Seek the new Character Areas Overlay sits under the 'District-wide – General matters' section of the Plan.</li> <li>iii. Amend planning maps to reflect the new title of the Character Areas Overlay (instead of Character Precincts).</li> <li>iv. Remove any areas that are identified as subject to Character Precincts (now Character Areas) if they are subject to and have the heritage areas applied.</li> <li>v. Seek that any specific sites or buildings that the Council considers to be worthy of protection to be assessed on a site-by-site basis to determine if it meets the definition of historic heritage as set out in s6 of the RMA and propose that those sites or buildings are considered for scheduling in the PDP, including any buildings that the Council considers having historic heritage values pre-1930s and should be protected.</li> </ul> <p>3. Make any consequential changes required to give effect to Kāinga Ora submission and the change in the provisions from a precinct to an overlay in the PDP.</p>

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4.	District Plan Wide	Oriental Bay Precinct	Oppose	<p>Kāinga Ora seeks that the Council reviews the methods adopted to manage the identified townscape values in the proposed Oriental Bay Height Precinct.</p> <p>Kāinga Ora considers that it is an option to create and identify a viewshaft managing those significant public views to the monastery and the maunga (Mt Victoria).</p>	<p>Seeks that the Council reviews the methods adopted to manage the identified townscape values in the proposed Oriental Bay Height Precinct and considers that it is an option to create and identify a viewshaft managing those significant public views to the monastery and the maunga (Mt Victoria).</p>
5.	District Plan Wide	Standards	Support in part	<p>Kāinga Ora generally supports the use of standards to manage potential adverse effects across the PDP. A number of changes to the building height controls are sought in this submission to ensure the NPSUD and the Housing Supply Act are effectively and efficiently implemented, that intensification is enabled in areas of high accessibility to commercial amenity, community services and public transport, and that height controls enable a transition of height and density within the urban built form from</p>	<ol style="list-style-type: none"> <li>1. Apply a height control of:             <ol style="list-style-type: none"> <li>a. City Centre Zone                 <ol style="list-style-type: none"> <li>i. 43m within a 400m walkable catchment of CCZ</li> <li>ii. 36m within a 400-1500m walkable catchment of CCZ.</li> </ol> </li> <li>b. Metropolitan Centre Zone                 <ol style="list-style-type: none"> <li>i. 29m within 400m walkable catchment of MCZ</li> <li>ii. Amend standards across the plan to be proportionate to the building height changes sought in this submission.</li> </ol> </li> </ol> </li> <li>2. Undertake any consequential changes necessary across the PDP to address the matters raised above.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>higher heights and densities in centres.</p> <p>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>Kāinga Ora seeks that where standards are not referenced in building and structure activity rules an activity status is provided for non-compliance with the standard. It is sought that this activity status in Centre and Residential Zones is a Restricted Discretionary to be consistent with the general approach throughout the Plan.</p>	<p>3. Seek that where standards are not referenced in building and structure activity rules an activity status is provided for non-compliance with the standard. It is sought that this activity status in the Centre and Residential Zones is a Restricted Discretionary to be consistent with the general approach throughout the Plan.</p> <p>4. Ensure that all standards have an appropriate activity status and/or are referenced in the building and structure activity rules.</p>

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				<p>For Example, NCZ-R18 does not require compliance with standards NCZ-S7 &amp; NCZ-S8 which relate to residential activities, this rule has been amended through relief sought in this submission; Kāinga Ora seeks consequential amendments throughout the PDP to address the relief sought through this submission point.</p>	
6.	District Plan Wide	Design guides / design guidelines	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 approach which would require development proposals to comply with such design guidelines in the District Plan.</p> <p>Kāinga Ora alternatively seeks and supports design guidelines sit 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, such as:</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 Guidelines and in any requirement to meet or follow the Design Guidelines in the provisions of the Plan.</p> <p>3. Where particular design outcomes are to be achieved, these should be specifically stated in policies and matters of discretion. Specific</p>

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				<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>examples are illustrated and sought in this submission.</p> <p>4. If the relief sought in this submission point is not granted, 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> <p>5. If the relief sought in this submission point is not granted, Kāinga Ora seeks the opportunity to review these guidelines if they are to remain a statutory document.</p> <p>6. Kāinga Ora seeks the opportunity to review these guidelines if they are to remain a statutory document</p>



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					7. Kāinga Ora seeks all necessary consequential changes to give effect to the relief sought.
7.	District Plan Wide	Natural Hazard Overlays	Oppose in part	<p>Kāinga Ora generally supports the risk-based approach to the management of natural hazards, however, 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.</p> <p>Kāinga Ora supports the inclusion of rules in relation to flood hazards but seeks that the rules are not linked to static maps.</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</p>	<p><i>Amendments sought.</i></p> <ol style="list-style-type: none"> <li>1. Remove the proposed Flood Hazards from the District Plan, and instead hold this information in non-statutory GIS maps that is publicly available.</li> <li>2. Seek for the flood hazard overlay maps to not be included in the District Plan.</li> <li>3. Amend and make consequential changes to give effect to this submission.</li> </ol>

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				<p>mapping viewer to the statutory maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect.</p> <p>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. This separate set of interactive maps are therefore able to be relied upon in a legal sense. Kāinga Ora otherwise supports the mapping of other, non-flooding natural hazards to be incorporated into the District Plan maps, such as Liquefaction and Fault Hazards, as these hazards are less subject to change.</p>	
8.	District Plan Wide	Active Frontage Controls	Support in Part	Kāinga Ora generally supports Active Frontage Controls but seek amendments to recognise that active frontage controls are useful to	<ol style="list-style-type: none"> <li>1. Only apply active frontage controls where necessary such as along principal roads/arterials not necessary along connecting streets.</li> </ol>

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				<p>achieve well-functioning urban environments where they are specifically applied on key roads where character and amenity values anticipated by underlying zoning are present.</p>	<ol style="list-style-type: none"> <li>2. Only control buildings that are located along any street edge rather than buildings on the whole site where an active frontage applies.</li> <li>3. Delete active frontage controls on streets and buildings where these matters do not apply.</li> <li>4. Amend and make consequential changes to give effect to this submission.</li> </ol>
9.	District Plan wide	Notification preclusions	Support in Part	<p>Kāinga Ora supports the inclusion of notification preclusions for restricted discretionary activities across the plan as this creates certainty to the development market.</p> <p>Kāinga Ora seeks that Public notification preclusions are included in the PDP where impacts may apply beyond the site being developed</p>	<ol style="list-style-type: none"> <li>1. Preclude public notification for restricted discretionary activities that relate to matters that will extent beyond the site being developed.</li> <li>2. Preclude limited notification for restricted discretionary activities that relate to matters that will not extend beyond the site being developed.</li> </ol>

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				<p>such as side yards, height, daylight, coverage.</p> <p>Kāinga Ora seeks that limited notification preclusions apply where effects are limited to the site being developed, such as outdoor living space infringements.</p>	
10.	District Wide Plan	Retail Gross Floor Area Thresholds	Support in part	<p>Kāinga Ora supports the need for restrictions on the gross floor area of retail, particularly within commercial (Centres) and mixed-use zones as this will ensure that there are appropriate opportunities for residential activities in these areas. However, it is noted that the Integrated Retail Activity gross floor areas of 20,000m<sup>2</sup> do not reflect the scale of the Centres hierarchy anticipated in the NPSUD and the National Planning Standards. In some cases, the size of the Zones would not be large enough to accommodate 20,000m<sup>2</sup> GFA.</p>	<p>Reduce the Integrated Retail Activity Gross Floor Area's in the lower order centres such Neighbourhood and Local Centre Zones to better reflect their lower order in the Centres hierarchy.</p>

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11.	District Wide Plan	Reverse sensitivity	Oppose	Reverse sensitivity is considered to be part of adverse effects and reference to 'reverse sensitivity' specifically is unnecessary and should be removed.	Seek any reference to 'reverse sensitivity' should be deleted from the Plan as it can be covered by general considerations relating to adverse effects.
<b>PART 1 – INTRODUCTION AND GENERAL PROVISIONS - INTERPRETATION - DEFINITIONS</b>					
12.	Definitions	Assisted Housing	Oppose	Kāinga Ora seeks deletion of this definition and oppose defining Assisted Housing.	Delete definition 'assisted housing' and remove reference from throughout the PDP.
13.	Definitions	Comprehensive Development	Oppose	Kāinga Ora seeks deletion of this definition and oppose defining Comprehensive development as a separate activity type from stand-alone houses or any other residential typology for the purposes of the zone rules and standards.	Delete definition of 'comprehensive development' and remove reference from throughout the PDP.
14.	Definitions	Demolition	Oppose	Kāinga Ora seeks deletion of this definition and oppose defining Demolition.	Delete definition 'demolition' and remove reference from throughout the PDP.

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15.	Definitions	Multi-Unit Housing	Oppose	<p>Kāinga Ora seeks deletion of this definition and oppose defining multi-unit housing as a separate activity type from stand-alone houses or any other residential typology for the purposes of the zone rules and standards.</p> <p>Consequential changes will also be needed throughout the residential, commercial, and mixed-use zone provisions to remove this distinction. Kāinga Ora considers that residential development should be considered on the basis of its effects and merits rather than specifically on typology or the scale/collective number of dwellings.</p> <p>Amendments sought throughout the District Plan with the deletion of any references of 'multi-unit housing' in objectives, policies, rules, and standards.</p>	Delete definition 'multi-unit housing' and remove reference from throughout the PDP.

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16.	Definitions	Natural Hazard Overlays	Oppose in part	As consistent with the rest of the submission, Kāinga Ora generally supports the risk-based approach to the management of natural hazards, however, opposes the inclusion of flood hazard mapping as part of the District Plan. Consequentially, Kāinga Ora seeks amendments to the Natural Hazard Overlay definition.	<p>Amend Definition as follows:</p> <p><b>NATURAL HAZARD OVERLAYS AREA</b> means the combined mapped extent within the district</p> <p>Plan of the following natural hazards:</p> <ul style="list-style-type: none"> <li>a. <del>—</del> Flood Hazards</li> <li>b. Liquefaction Hazards</li> <li>c. Fault Hazards</li> </ul> <p><u>And the Council's 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.</u></p>
<b>PART 2 – DISTRICT WIDE MATTERS – STRATEGIC DIRECTION – ANGA WHAKAMUA</b>					
17.	Anga Whakamua	AW-O1	Support	Kāinga Ora generally supports the Anga Whakamua objectives.	<i>Retain as notified.</i>
18.	Anga Whakamua	AW-O2	Support	Kāinga Ora generally supports the Anga Whakamua objectives.	<i>Retain as notified.</i>

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19.	Anga Whakamua	AW-O3	Support	Kāinga Ora generally supports the Anga Whakamua objectives.	<i>Retain as notified.</i>
20.	Anga Whakamua	AW-O4	Support	Kāinga Ora generally supports the Anga Whakamua objectives.	<i>Retain as notified.</i>
<b>PART 2 – DISTRICT WIDE MATTERS – STRATEGIC DIRECTION – CAPITAL CITY</b>					
21.	Capital City	CC-O1	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified.</i>
22.	Capital City	CC-O2	Support in part	Kāinga Ora supports the Objective in part but seeks an amendment so as not to be overly constraining of where urban intensification can occur.	<i>Amend as follows:</i>  Wellington City is a well-functioning Capital City where: <ol style="list-style-type: none"> <li>1. A wide range of activities that have local, regional, and national significance are able to establish and thrive.</li> <li>2. The social, cultural, economic, and environmental wellbeing of current and future residents is</li> </ol>



ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>supported</p> <p>3. Mana whenua values and aspirations are visible, celebrated and an integral part of the City's identity.</p> <p>4. Urban intensification is delivered <del>in appropriate locations and</del> in a manner that meets the needs of current and future generations.</p> <p>5. Innovation and technology advances that support the social, cultural, economic and environmental wellbeing of existing and future residents are promoted.</p> <p>Values and characteristics that are an important part of the City's identity and sense of place are identified and protected.</p>
23.	Capital City	CC-O3	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified.</i>
<b>PART 2 – DISTRICT WIDE MATTERS – STRATEGIC DIRECTION – CITY ECONOMY, KNOWELDGE AND PROSPERITY</b>					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
24.	City Economy, Knowledge and Prosperity	CEKP-O1	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified.</i>
25.	City Economy, Knowledge and Prosperity	CEKP-O2	Support in Part	Kāinga Ora generally supports these objectives apart from an amendment to CEKP – O2 that introduces the Town Centre Zone within the centres hierarchy and differentiates between the scale, role and function of Town and Local Centres to achieve consistency with the National Planning Standards, and better reflect growth outcomes and the role and function of centres within the urban environment.	<p><i>Amend as follows:</i></p> <p>The City maintains a hierarchy of centres based on their role and function, as follows:</p> <ol style="list-style-type: none"> <li>1. City Centre – the primary centre serving the City and the wider region for shopping, employment, city-living, government services, arts and entertainment, tourism and major events. The City Centre is easily accessible and easy to navigate for all and serves as a major transport hub for the City and wider region. The City Centre is the primary location for future intensification for both housing and business needs;</li> <li>2. Metropolitan Centres – these centres provide significant support to the City Centre Zone at a sub-regional level by offering key services to the outer suburbs of Wellington City and the wider Wellington region. They contain a wide range of commercial, civic and government</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>services, employment, office, community, recreational, entertainment and residential activities. Metropolitan Centres are major transport hubs for the City and are easily accessible by a range of transport modes, including rapid transit. As a result, these centres are will be major live-work hubs for the City over the next 30 years. Intensification for housing and business needs will be enabled in these locations, to complement the City Centre;</p> <p>3. <u>Town Centres – these centres service the surrounding suburbs. Town centres contain a range of commercial, community, recreational and entertainment activities. Town Centres are well-connected to the City’s public transport network and active transport modes are also provided for. Town Centres will play a role in accommodating and servicing the needs of the existing and forecast population growth that is complementary to the City Centre and Metropolitan Centre Zones. This intensification is due to the capacity of the area to absorb more high-density housing with enablers of growth such as</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>offering a walkable access to public transport, community facilities and services; and</u></p> <p>4. Local Centres – these centres service the surrounding residential catchment <del>and neighbouring suburbs</del>. Local Centres contain a range of commercial, community, recreational and entertainment activities. Local Centres are well-connected to the City’s public transport network and active transport modes are also provided for. Local Centres will play a role in accommodating and servicing the needs of the existing and forecast population growth that is complementary to the City Centre, <del>and</del> Metropolitan Centre, <u>and Town Centre</u> Zones. This intensification is due to the capacity of the area to absorb more <u>medium density</u> housing with enablers of growth such as walkable access to public transport, <del>and</del> community facilities and services and;</p> <p>5. Neighbourhood Centres - these centres service the immediate residential neighbourhood and offer small-scale convenience-based retail for day-to-day</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					needs. These centres are generally for small commercial clusters and community services. Neighbourhood Centres are accessible by public transport and active transport modes.  <i>6. Consequential changes to numbering is also sought.</i>
26.	City Economy, Knowledge, and Prosperity	CEKP-O3	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified.</i>
27.	City Economy, Knowledge and Prosperity	CEKP-O5	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified.</i>
<b>PART 2 – DISTRICT WIDE MATTERS – STRATEGIC DIRECTION – HISTORIC HERITAGE AND SITES AND AREAS OF SIGNIFICANCE TO MĀORI</b>					
28.	Historic Heritage and Sites and Areas of Significance to Māori	HHSASM-O1	Support	Kāinga Ora generally supports the HHSASM objectives.	<i>Retain as notified.</i>
29.	Historic Heritage and Sites and Areas of Significance to Māori	HHSASM-O2	Support	Kāinga Ora generally supports the HHSASM objectives.	<i>Retain as notified.</i>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
30.	Historic Heritage and Sites and Areas of Significance to Māori	HHSASM-03	Support	Kāinga Ora generally supports the HHSASM objectives.	<i>Retain as notified.</i>
31.	Historic Heritage and Sites and Areas of Significance to Māori	HHSASM-04	Support	Kāinga Ora generally supports the HHSASM objectives.	<i>Retain as notified.</i>
32.	Historic Heritage and Sites and Areas of Significance to Māori	HHSASM-05	Support	Kāinga Ora generally supports the HHSASM objectives.	<i>Retain as notified.</i>
<b>PART 2 – DISTRICT WIDE MATTERS – STRATEGIC DIRECTION – NATURAL ENVIRONMENT</b>					
33.	Natural Environment	NE-O1	Support	Kāinga Ora generally supports the Natural Environment objectives.	<i>Retain as notified.</i>
34.	Natural Environment	NE-O2	Support	Kāinga Ora generally supports the Natural Environment objectives.	<i>Retain as notified.</i>
35.	Natural Environment	NE-O3	Support	Kāinga Ora generally supports the Natural Environment objectives.	<i>Retain as notified.</i>
36.	Natural Environment	NE-O4	Support	Kāinga Ora generally supports the Natural Environment objectives.	<i>Retain as notified.</i>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
<b>PART 2 – DISTRICT WIDE MATTERS – STRATEGIC DIRECTION – STRATEGIC ASSETS AND INFRASTRUCTURE</b>					
37.	Strategic Assets and Infrastructure	SCA-O1	Support	Kāinga Ora generally supports these objectives.	<i>Retain as notified.</i>
38.	Strategic Assets and Infrastructure	SCA-O2	Support	Kāinga Ora generally supports these objectives.	<i>Retain as notified.</i>
39.	Strategic Assets and Infrastructure	SCA-O3	Support	Kāinga Ora generally supports these objectives.	<i>Retain as notified.</i>
40.	Strategic Assets and Infrastructure	SCA-O4	Support	Kāinga Ora generally supports these objectives.	<i>Retain as notified.</i>
41.	Strategic Assets and Infrastructure	SCA-O5	Support	Kāinga Ora generally supports these objectives.	<i>Retain as notified.</i>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
42.	Strategic Assets and Infrastructure	SCA-O6	Support	Kāinga Ora generally supports these objectives.	<i>Retain as notified.</i>
<b>PART 2 – DISTRICT WIDE MATTERS – STRATEGIC DIRECTION – SUSTAINABILITY, RESILIENCE AND CLIMATE CHANGE</b>					
43.	Sustainability, Resilience and Climate Change	SRCC-O1	Support	Kāinga Ora generally supports the Natural Environment objectives.	<i>Retain as notified.</i>
44.	Sustainability, Resilience and Climate Change	SRCC-O2	Support		<i>Retain as notified.</i>
45.	Sustainability, Resilience and Climate Change	SRCC-O3	Support		<i>Retain as notified.</i>
46.	Sustainability, Resilience and Climate Change	SRCC-O4	Support		<i>Retain as notified.</i>
<b>PART 2 – DISTRICT WIDE MATTERS – STRATEGIC DIRECTION – URBAN FORM AND DEVELOPMENT</b>					
47.	Urban Form and Development	Section-wide	Oppose	Kāinga Ora opposes the definition and term 'Assisted housing' as part of the PDP. Kāinga Ora seeks the deletion of the term throughout the PDP.	Seek deletion of the term 'assisted housing' and any references to it in the PDP, including and but not limited to the UFD-Introduction, UFD-O3 and UFD-O6.



48.	Urban Form and Development	UFD-01 and UFD-02	Support in part	Kāinga Ora generally supports the objectives.	<i>Retain as notified.</i>
49.	Urban Form and Development	UFD-03	Support in part	Kāinga Ora seeks amendments to the enable higher density residential living across the city, including the city centre zone. Aligned to the NPS-UD.	<i>Amend as follows:</i>  <del>Medium to high</del> <u>High</u> density <del>and assisted</del> housing developments are located in areas that are: <ol style="list-style-type: none"> <li>1. Connected to the transport network and served by multi-modal transport options; or</li> <li>2. Within or near a <u>City Centre Zone or a</u> Centre Zone or other area with many employment opportunities; and</li> <li>3. Served by public open space and other social infrastructure.</li> </ol>
50.	Urban Form and Development	UFD-04	Support in part	Kāinga Ora seeks amendments to clarify that the specified development capacity is a minimum to be provided in the District Plan rather than a target.	In order to achieve sufficient, feasible land development capacity to meet expected housing demand, the following housing bottom lines below are to be <del>met or</del> exceeded in the short-medium and long term in Wellington City as contained in the Wellington Regional Housing and Business Capacity Assessment (Housing Update 2022)...
51.	Urban Form and Development	UFD-05	Support in part	Kāinga Ora seeks amendments to clarify that the specified development capacity is a minimum to be provided in the District Plan rather than a target and feasible	<i>Amend as follows:</i>  <u>At least</u> sufficient, <u>feasible</u> land development capacity is available to meet the short, medium, and long-term business land needs of the City, as identified in the

				development should be provided for.	Wellington Regional Housing and Business Capacity Assessment.
52.	Urban Form and Development	UFD-06	Support in part	Kāinga Ora generally supports the objective but seeks amendments to clarify that the tenure is not relevant to achieving quality urban environments, but the range of types and sizes of housing are.	<i>Amend as follows:</i>  A variety of housing types <del>and</del> sizes <del>and tenures,</del> including assisted housing, supported residential care, and papakainga options, are available across the City to meet the community's diverse social, cultural, and economic housing needs.
53.	Urban Form and Development	UFD-07	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified.</i>
54.	Urban Form and Development	UFD-08	Oppose	Kāinga Ora oppose the recognition of 'special character' at the strategic level of the plan. This is more appropriately addressed through the relevant zone provisions and precincts. Character is not a NPSUD qualifying matter and as these are not referenced here then neither should special character.	<i>Delete UFD-08.</i>
<b>PART 2 – DISTRICT WIDE MATTERS – ENERGY, INFRASTRUCTURE, TRANSPORT – THREE WATERS</b>					
55.	Three Waters	Other relevant District Plan Provisions	Support in part	Kāinga Ora generally supports this section but seeks that reference to Natural Hazard Overlay is replaced with Natural Hazard Area as outlined in comments in the Natural Hazards Chapter.	<i>Amend as follows:</i>  <b>Natural Hazards</b> – The Natural Hazards chapter addresses subdivision, use and development in the Natural Hazard <del>Overlays</del> areas.

56.	Three Waters	THW-O2	Support	Kāinga Ora generally supports the objective, particularly as it recognises alternative means of servicing development where existing infrastructure is at capacity.	<i>Retain as notified.</i>
57.	Three Waters	THW-O3	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified.</i>
58.	Three Waters	THW-P1	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
59.	Three Waters	THW-P2	Support in part	<p>Kāinga Ora generally supports the policy.</p> <p>Furthermore, the use of avoid in the policy does not match the rule setting for non-compliance (restricted discretionary activity) and it may be appropriate to use these building materials in some instances where there are no impacts on the stormwater system.</p>	<p><i>Amendments sought.</i></p> <p><i>Remove reference to Avoid as follows:</i></p> <p><b>Building Materials</b></p> <p>The <del>use of copper and zinc building materials is avoided or the</del> effects of copper and zinc entering the stormwater system <del>from the use as roofing and guttering materials</del> are mitigated through the use of appropriate treatment.</p>
60.	Three Waters	THW-P3	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
61.	Three Waters	THW-P4	Support in part	<p>Kāinga Ora supports this policy in part.</p> <p>This policy recognises and provides for alternative means servicing</p>	<p><del>Limit Provide for</del> subdivision and development in urban areas where existing three waters capacity and/or level of service is insufficient to service further development, <del>including and:</del></p>

				<p>development where existing infrastructure is at capacity. The policy fails to recognise that development in urban areas may necessitate additional public investment in expansion of the three waters infrastructure. The appropriate response to this issue is to increase public investment where needed rather than to constrain otherwise appropriate development.</p> <p>Amendments sought so the policy recognises that development in urban areas may necessitate additional public investment in expansion of the three waters infrastructure.</p>	<ol style="list-style-type: none"> <li>1. It can be demonstrated there is an alternative solution to avoid or mitigate any adverse effects on the three waters infrastructure network and the health and wellbeing of water bodies and freshwater ecosystems. <del>and or</del></li> <li>2. <u>Additional public investment in three waters infrastructure is appropriate and possible to enable the planned urban built form of the underlying zone and achieve a compact urban form.</u> <del>The additional demand generated will not necessitate additional unplanned public investment in, or expansion of, the three waters infrastructure network or compromise its ability to service other activities permitted within the zone</del></li> </ol>
62.	Three Waters	THW-R2	Support	Kāinga Ora supports this rule.	<i>Retain as notified.</i>
<b>PART 2 – DISTRICT WIDE MATTERS – ENERGY, INFRA STRUCTURE, TRANSPORT – INFRASTRUCTURE</b>					
63.	Infrastructure	INF-O1	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified.</i>
64.	Infrastructure	INF-O2	Support in part	Kāinga Ora seeks amendments to the proposed objective. Any adverse effects from infrastructure on the environment should be mitigated and managed to ensure effects are	<p><b>Adverse effects of infrastructure</b></p> <p>The adverse effects of infrastructure on the environment are <u>mitigated and</u> managed, while recognising:</p>

				reduced overtime. Amendments sought.	<ol style="list-style-type: none"> <li>1. The functional and operational need of infrastructure; and</li> <li>2. That positive effects of infrastructure may be realised locally, regionally or nationally.</li> </ol>
65.	Infrastructure	INF-O3	Support in part	<p>Kāinga Ora seeks supports the management of adverse effects on the function and operation of the infrastructure network, however, seeks the deletion of reverse sensitivity effects to prevent a single effect from being singled out.</p> <p>Amendments sought.</p>	<p><b>Adverse effects on infrastructure</b></p> <p>Manage the adverse effects, <del>including reverse sensitivity effects or of</del> subdivision use and development on the function and operation of infrastructure. INF-O4</p>
66.	Infrastructure	INF-O4	Support	<p>Kāinga Ora generally supports the objective</p>	<p><i>Retain as notified.</i></p>
67.	Infrastructure	INF-O5	Oppose	<p>Kāinga Ora generally supports this policy in part but does not support the division of transport related provisions between the transport and infrastructure chapters. This is inconsistent with best practice and makes navigation of the plan difficult for users.</p> <p>Kāinga Ora seeks the full package of transport related provisions</p>	<p><i>Kāinga Ora seeks the full package of transport related provisions (objectives, policies, rules and definitions) are reviewed, amended and located in the Transport Chapter. In doing so, there may be some provisions that need to be deleted.</i></p>

				(objectives, policies, rules and definitions) are reviewed and located in the Transport Chapter.	
68.	Infrastructure	INF-P1	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
69.	Infrastructure	INF-P2	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
70.	Infrastructure	INF-P3	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
71.	Infrastructure	INF-P5	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
72.	Infrastructure	INF-P6	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
73.	Infrastructure	INF-P7	Oppose	<p>Kāinga Ora seeks the deletion of this policy.</p> <p>Kāinga Ora also seeks removal of specific policy for “reverse sensitivity effects.” The objective of this is readily captured by the objective 2 and policy 6 above.</p> <p>Deletion and consequential changes to the PDP sought.</p>	<i>Delete policy. All consequential changes sought.</i>

74.	Infrastructure	INF-P9	Support in part	<p>Kāinga Ora generally supports this policy but does not support the division of transport related provisions between the transport and infrastructure chapters. This is inconsistent with best practice and makes navigation of the plan difficult for users.</p> <p>Kāinga Ora seeks the full package of transport related provisions (objectives, policies, rules and definitions) are reviewed and located in the Transport Chapter.</p>	<p><i>Kāinga Ora seeks the full package of transport related provisions (objectives, policies, rules and definitions) are reviewed, amended and located in the Transport Chapter. In doing so, there may be some provisions that are need to be deleted.</i></p>
75.	Infrastructure	INF-P10	Support in part	<p>Kāinga Ora generally supports this policy P10 but does not support the division of transport related provisions between the transport and infrastructure chapters. This is inconsistent with best practice and makes navigation of the plan difficult for users.</p> <p>Kāinga Ora seeks the full package of transport related provisions (objectives, policies, rules, and definitions) are reviewed and located in the Transport Chapter.</p>	<p><i>Kāinga Ora seeks the full package of transport related provisions (objectives, policies, rules, and definitions) are reviewed, amended and located in the Transport Chapter. In doing so, there may be some provisions that need to be deleted.</i></p>

76.	Infrastructure	INF-P11	Support in part	<p>Kāinga Ora generally supports this policy but does not support the division of transport related provisions between the transport and infrastructure chapters. This is inconsistent with best practice and makes navigation of the plan difficult for users.</p> <p>Kāinga Ora seeks the full package of transport related provisions (objectives, policies, rules and definitions) are reviewed and located in the Transport Chapter.</p>	<p><i>Kāinga Ora seeks the full package of transport related provisions (objectives, policies, rules and definitions) are reviewed, amended and located in the Transport Chapter. In doing so, there may be some provisions that need to be deleted.</i></p>
77.	Infrastructure	INF-All Rules	Oppose	<p>Kāinga Ora seeks the introduction of notification preclusion statement (for both public and limited notification) for restricted discretionary activities. The technical nature of these breaches requires technical and/or engineering assessments, and public participation by way of limited or public notification will unlikely add anything to the consideration of the effects of these breaches. Amendments sought.</p>	<p><b><u>Notification:</u></b></p> <p><u>Applications under this rule are precluded from being publicly or limited notified in accordance with section 95A or section 95B of the RMA.</u></p>
78.	Infrastructure	INF-R4	Oppose	<p>Kāinga Ora opposes the division of transport related provisions between the transport and</p>	<p><i>Kāinga Ora seeks the full package of transport related provisions (objectives, policies, rules and definitions) are reviewed, amended and located in</i></p>



				<p>infrastructure chapters. This is inconsistent with best practice and makes navigation of the plan difficult for users.</p> <p>Kāinga Ora seeks the full package of transport related provisions (objectives, policies, rules and definitions) are reviewed and located in the Transport Chapter. Any deletions sought are also to be carried across to the Transport Chapter.</p> <p>Amendments and consequential changes sought.</p>	<p><i>the Transport Chapter. In doing so, there may be some provisions that are need to be deleted.</i></p>
79.	Infrastructure	INF-R22	Support in part	<p>Kāinga Ora seeks amendments to this rule to remove the establishment of new sensitive activities from the National Grid Yard as a permitted activity. The rule is considered to appropriately cover the alteration and addition to existing sensitive activities.</p> <p>Deletions are also sought to remove the requirement that all applications for resource consent under INF-R22</p>	<p><i>Amendments sought. Consequential renumbering required.</i></p> <p>1. Activity status: <b>Permitted</b></p> <p>Where:</p> <p>a. <del>The activity is not a sensitive activity;</del></p> <p>b. The building or structure is not for the handling or storage of sus with explosive or flammable intrinsic properties (except this does not apply to the accessory use and storage of hazardous substances in domestic scale quantities); and</p>

				<p>require the written approval of Transpower New Zealand.</p> <p>Kāinga Ora seeks amendments to this rule.</p>	<p>c. The structure is a fence not exceeding 2.5m in height.</p> <p>d. The building is an uninhibited farm or horticultural structure or building (but not commercial greenhouses, protective canopies, wintering barns, produce packing facilities, or milking/dairy shed (excluding ancillary stockyards and platforms));</p> <p>e. Alterations and additions to existing building or structure <del>for a sensitive activity</del>, which does not involve an increase in the building height or building footprint; or</p> <p>f. An accessory building associated with an existing residential activity that is less than 10m<sup>2</sup> in footprint and 2.5m in height;</p> <p>g. Infrastructure undertaken by a network utility operator as defined in the Resource Management Act 1991 or any part of electricity infrastructure that connects to the National Grid; and</p> <p>h. Compliance is achieved with INF-S12.</p> <p>2. Activity status: <b>Non-complying</b></p> <p>Where:</p> <p>a. Compliance with INF-R22.1 cannot be achieved.</p> <p>Notification:</p>
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					<p>An application for resource consent made in respect of rule INF-R22.2 is precluded from being publicly <u>or limited</u> notified.</p> <p><del>Notice of any application for resource consent under this rule must be served on Transpower New Zealand Limited in accordance with Clause 10(2)(i) of the Resource Management (Forms, Fees, and Procedures) Regulations 2003.</del></p>
80.	Infrastructure	INF-R24	Oppose	<p>Kāinga Ora opposes the division of transport related provisions between the transport and infrastructure chapters. This is inconsistent with best practice and makes navigation of the plan difficult for users.</p> <p>Kāinga Ora seeks the full package of transport related provisions (objectives, policies, rules and definitions) are reviewed and located in the Transport Chapter.</p> <p>Amendments and consequential changes sought.</p>	<p><i>Kāinga Ora seeks the full package of transport related provisions (objectives, policies, rules and definitions) are reviewed, amended and located in the Transport Chapter. In doing so, there may be some provisions that are need to be deleted.</i></p>
81.	Infrastructure	INF-R25	Oppose	<p>Kāinga Ora opposes the division of transport related provisions between the transport and infrastructure chapters. This is</p>	<p><i>Kāinga Ora seeks the full package of transport related provisions (objectives, policies, rules and definitions) are reviewed, amended and located in the Transport</i></p>

				<p>inconsistent with best practice and makes navigation of the plan difficult for users.</p> <p>Kāinga Ora seeks the full package of transport related provisions (objectives, policies, rules and definitions) are reviewed and located in the Transport Chapter.</p> <p>Amendments and consequential changes sought.</p>	<p><i>Chapter. In doing so, there may be some provisions that are need to be deleted.</i></p>
82.	Infrastructure	INF-S12	Oppose in part	<p>Kāinga Ora opposes specific requirements of the National Grid provision and seeks amendments to the package of the provisions. Amendments sought.</p>	<p><i>Amendments sought:</i></p> <ol style="list-style-type: none"> <li>1. The building or structure must have a minimum vertical clearance of 10m below the lowest point of a conductor; or</li> <li>2. Must meet the safe electrical clearance distances required by New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663.</li> <li>3. The building or structure must be located at least 12m from the outer visible edge of a foundation of a National Grid transmission line tower or pole, except where it:             <ol style="list-style-type: none"> <li>a. Is a fence not exceeding 2.5m in height <del>that is located at least:</del> <ol style="list-style-type: none"> <li>i. <del>6m from the outer visible edge of a foundation of a National Grid transmission line tower; or</del></li> </ol> </li> </ol> </li> </ol>

					<p><del>ii. — 5m from the outer visible edge of a foundation of a National Grid transmission line pole.</del></p> <p><del>b. Is an artificial crop protection structure or crop support structure not exceeding 2.5m in height and located at least 8m from a National Grid transmission line pole that:-</del></p> <p><del>i. — Is removable or temporary to allow a clear working space of 12m from the pole for maintenance; and</del></p> <p><del>ii. — allows all weather access to the pole and a sufficient area for maintenance equipment, including a crane; or</del></p> <p><del>c. Meets the requirements of clause 2.4.1 of New Zealand Electrical Code of Practice for Safe Electrical Distances (NZECP 34:2001) ISSN 01140663.-</del></p>
83.	Infrastructure	INF-S13	Oppose	<p>Kāinga Ora opposes the division of transport related provisions between the transport and infrastructure chapters. This is inconsistent with best practice and makes navigation of the plan difficult for users.</p>	<p><i>Kāinga Ora seeks the full package of transport related provisions (objectives, policies, rules and definitions) are reviewed, amended and located in the Transport Chapter. In doing so, there may be some provisions that are need to be deleted.</i></p>
84.	Infrastructure	TABLE 1- INF	Oppose		
85.	Infrastructure	TABLE 2- INF	Oppose		
86.	Infrastructure	TABLE 3 - INF	Oppose		

87.	Infrastructure	TABLE 4 - INF	Oppose	<p>Kāinga Ora seeks the full package of transport related provisions (objectives, policies, rules and definitions) are reviewed and located in the Transport Chapter.</p> <p>Amendments and consequential changes sought.</p>	
88.	Infrastructure	FIGURE 1 - INF	Oppose		
89.	Infrastructure	INF-S16	Oppose		
90.	Infrastructure	FIGURE 2- INF	Oppose		
91.	Infrastructure	FIGURE 3- INF	Oppose		
92.	Infrastructure	TABLE 5- INF	Oppose		
93.	Infrastructure	INF-S17	Oppose		
94.	Infrastructure	FIGURE 4- INF	Oppose		
95.	Infrastructure	TABLE 6- INF	Oppose		
<b>PART 2 – DISTRICT WIDE MATTERS – ENERGY, INFRASTRUCTURE, TRANSPORT – TRANSPORT</b>					
96.	Transport	TR-P1	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
97.	Transport	TR-P2	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>

98.	Transport	TR-all rules	Oppose	<p>Kāinga Ora seeks the introduction of notification preclusion statement (for both public and limited notification) for restricted discretionary activities. The technical nature of these breaches requires technical and/or engineering assessments, and public participation by way of limited or public notification will unlikely add anything to the consideration of the effects of these breaches. Amendments sought.</p>	<p><b><u>Notification:</u></b></p> <p><u>Applications under this rule are precluded from being publicly or limited notified in accordance with section 95A or section 95B of the RMA.</u></p>								
99.	Transport	TR-S1	Support in part	<p>Kāinga Ora seeks various amendments and also seeks the evidential basis for the assessment criteria.</p>	<p><i>Amendments sought:</i></p> <table border="1" data-bbox="1503 818 2148 1082"> <tr> <td colspan="2" data-bbox="1503 818 2148 898">1. Activities must not exceed the following maximum vehicle movement thresholds:</td> </tr> <tr> <th data-bbox="1503 898 1827 978">Type of vehicle</th> <th data-bbox="1827 898 2148 978">Maximum Number of vehicle movements</th> </tr> <tr> <td data-bbox="1503 978 1827 1031">Light</td> <td data-bbox="1827 978 2148 1031"><del>200</del> <u>500 per day</u></td> </tr> <tr> <td data-bbox="1503 1031 1827 1082">Heavy</td> <td data-bbox="1827 1031 2148 1082">8 per week</td> </tr> </table>	1. Activities must not exceed the following maximum vehicle movement thresholds:		Type of vehicle	Maximum Number of vehicle movements	Light	<del>200</del> <u>500 per day</u>	Heavy	8 per week
1. Activities must not exceed the following maximum vehicle movement thresholds:													
Type of vehicle	Maximum Number of vehicle movements												
Light	<del>200</del> <u>500 per day</u>												
Heavy	8 per week												

					<p>For the purpose of the above assessment:</p> <ol style="list-style-type: none"> <li>An on-site carpark associated with a residential activity is considered to generate 10 light vehicle movements per day;</li> <li>Vehicle movements per day must be assessed as average vehicle movements per day, averaged over a full seven-day week;</li> <li>Vehicle movements per week must be assessed as average vehicle movements per week, averaged over a full 52-week year.</li> </ol>
100.	Transport	TR-S7	Support in part	<p>Kāinga Ora seeks various amendments to the design requirements.</p>	<p><i>Amendments sought</i></p> <ol style="list-style-type: none"> <li>Where provided on a site, car parking spaces and associated circulation and manoeuvring areas must be designed to accommodate a 4.91m x 1.87m vehicle (85th percentile vehicle) as the minimum design vehicle, with 300mm clearance per side to obstructions and a minimum outside turning radius of 5.8m.</li> <li>Car parking spaces must: <ol style="list-style-type: none"> <li>Comply with the minimum dimensions of Figure 5 – TR: Parking and Table 10 – TR: Parking Space Dimensions;</li> <li>Have a maximum gradient of 5% in any direction; and</li> <li>Have a minimum height clearance of 2.3m;</li> <li><del>For residential on-site car parking spaces, be electric vehicle-charging-ready by being</del></li> </ol> </li> </ol>



					<p><del>serviced with an electrical cable conduit from the electricity supply to the edge of the carpark.</del></p>
PART 2 – DISTRICT WIDE MATTERS – HAZARDS AND RISKS – NATURAL HAZARDS					
101.	Natural Hazards	Chapter wide	Oppose	<p>Kāinga Ora generally supports the risk-based approach to the management of natural hazards, however opposes the inclusion of flood hazard mapping as part of the District Plan.</p> <p>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 accepts that it is appropriate to include rules in relation to flood hazards but seeks that the rules are not linked to static maps.</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</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, 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> <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>

				<p>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 includes a number of specific overlay and other symbols, but none relate to flooding.</p> <p>Kāinga Ora seeks the removal of the mapped flooding Natural Hazard Overlays from within the District Plan, this should instead be included as a non-statutory, information only mapping layer that sits outside the Proposed District Plan and refer to “Natural Hazard Overlays” as “Natural Hazard Areas”.</p> <p>Kāinga Ora otherwise supports the mapping of other, non-flooding natural hazards to be incorporated into the District Plan maps, such as Liquefaction and Fault Hazards (in</p>	
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				additional to Coastal Hazards), as these hazards are less subject to change.	
102.	Natural Hazards	NH-R11	Oppose	<p>Kāinga Ora opposes this rule. Identified flooding inundation areas carry the lowest risk of natural hazard potential and are more than capable of being mitigated. Therefore it is considered that a permitted activity pathway should be available for development that achieves the 1% Flood Annual Exceedance Probability level, including allowance for freeboard.</p>	<p><i>Amendments sought.</i></p> <p><b>Hazard Sensitive Activities in the Inundation Area of the Flood Hazard <u>Overlay Area</u></b></p> <p>All Zones</p> <p>1. Activity Status: <del>Restricted-Discretionary</del> <u>Permitted Activity</u></p> <p>Where:</p> <p>a. When located within an Inundation Area of the Flood Hazard <del>Overlay Area</del>, the finished floor level of the building for the hazard sensitive activity is located above the 1% Flood Annual Exceedance Probability level, including allowance for freeboard, where the finished floor level is to the bottom of the floor joists for the base of the concrete floor slab.</p> <p><del>Matters of discretion are:</del> .....</p> <p>2. Activity Status: <del>Non-Complying-Restricted</del> <u>Discretionary</u></p>

					<p>Where:</p> <p>a. Compliance with the requirements of NH-R11.1 cannot be achieved.</p> <p><u>Matters of discretion are:</u></p> <p><u>1. The degree to which the impact from the 1% Annual Exceedance Probability flood is low due to either the:</u></p> <p>a) <u>Implementation of mitigation measures</u></p> <p>b) <u>The shallow depth of the flood waters within the building; or</u></p> <p>c) <u>Type of activity undertaken within the building</u></p> <p><u>2. The extent to which the risk to people and property is reduced or not increased.</u></p>
103.	Natural Hazards	NH-R12	Support in part	<p>Kainga Ora supports the general approach that impacts on hazard sensitive activities should be mitigated in medium risk areas in accordance with NH-P2. On this basis rule NH-R12.2 needs to be amended as overland flowpaths are identified as a medium risk area in the chapter introduction. Consequently, Kāinga Ora seeks the consent status of NH-R12 to be discretionary rather than non-</p>	<p><i>Amend NH-R12.2 as follows:</i></p> <p>2. Activity Status: <b><u>Non-Complying Discretionary</u></b></p> <p>Where:</p> <p>a. Compliance with the requirements of NH-R12.1.a cannot be achieved.</p>

				<p>complying as non-complying status is generally utilised for avoidance rather than mitigation.</p> <p>Amendment sought.</p>	
<b>PART 2 – DISTRICT-WIDE MATTERS – HISTORIC AND CULTURAL VALUES - HISTORIC HERITAGE</b>					
104.	Historic Heritage	All	Oppose in part	<p>Kāinga Ora seeks clarity and definition to contributing vs non-contributing buildings, scheduled vs non-scheduled buildings.</p> <p>It is not clear which rules apply to a scheduled heritage building, a non-scheduled contributing building, and a non-scheduled non-contributing buildings. Amendments required throughout the chapter to provide clarity to when rules apply to respective buildings in Historic Heritage chapter.</p>	<p>Seek amendments to provide clarity to when objectives, policies, rules and standards apply to a:</p> <ul style="list-style-type: none"> <li>- scheduled heritage building,</li> <li>- a non-scheduled heritage building but is considered to be a contributing building; and</li> <li>- a non-scheduled heritage building that is non-contributing.</li> </ul> <p>Amendments required throughout this chapter.</p>
105.	Historic Heritage	HH-P7	Support in Part	<p>Kāinga Ora generally supports a policy to provide for alterations and additions to heritage buildings and structures. However blanket reference to the extent to which work fulfils the intent of the Heritage Design Guide is considered unnecessary when the other arms of</p>	<p><i>Amend HH-P7 as follows:</i></p> <p><b>Additions, alterations and partial demolition of <u>scheduled</u> heritage buildings and structures</b></p> <p>Provide for additions and alterations to, and partial demolition of <u>scheduled</u> heritage buildings and heritage structures where it can be</p>

				<p>the Policy (1(a) to (i) and 2-6) provides more than adequate guidance as to which specific matters need to be considered.</p> <p>Kāinga Ora seeks the Policy focuses on the identified heritage values as outlined in the Wellington Heritage Inventory balanced with the outcomes sought within the Zone the buildings and structures are located within. The Heritage Design Guide should only be used as a reference document as the detail in the guide is high level and of limited value and should be utilised as a non-statutory document.</p>	<p>demonstrated that the work does not detract from the identified heritage values, having regard to:</p> <ol style="list-style-type: none"> <li>1. The extent to which the work: <ol style="list-style-type: none"> <li>a. Supports the heritage building or heritage structure having a sustainable long term use;</li> <li>b. Promotes, enhances, recovers or reveals heritage values;</li> <li>c. Retains the main determinants of the architectural style or design of the heritage building or heritage structure;</li> <li>d. Is compatible with the scale, form, proportion and materials of the heritage building or heritage structure;</li> <li>e. Respects the identified relationship of the heritage building or heritage structure with its setting;</li> <li>f. Enables any adverse effects on identified heritage values to be reversed;</li> <li>g. Minimizes the loss of fabric and craftsmanship;</li> <li>h. Is in accordance with any conservation plan that has been prepared by a suitably qualified heritage professional;</li> <li>i. Increases structural stability, accessibility and means of escape from fire;</li> <li><del>j. Fulfils the intent of the Heritage Design Guide;</del></li> </ol> </li> <li>2. The visibility of the work from street frontages;</li> <li>3. Whether the works would lead to cumulative adverse effects on identified heritage values;</li> <li>4. Whether there has been any change in circumstances since scheduling in the District Plan, including damage from natural disaster;</li> </ol>
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					<p>5. Any advice that has been obtained from a suitably qualified heritage professional including Heritage New Zealand Pouhere Taonga; and</p> <p>6. The identified heritage values of the heritage area, where located within a heritage area.</p> <p><u>Note – Please refer to the Heritage Design Guide for further guidance</u></p>
106.	Historic Heritage	HH-P8	Support in part	<p>Kāinga Ora generally supports a policy to provide for new buildings and structures. However blanket reference to the extent to which work fulfils the intent of the Heritage Design Guide is considered unnecessary when the other arms of the Policy provide adequate guidance as to which matters need to be considered. Kāinga Ora therefore seeks the Policy focuses on the identified heritage values outlined in the Wellington Heritage Inventory balanced with the outcomes sought within the Zone the buildings and structures are located within. The Heritage Design Guide should only be used as a reference document as the detail in the guide is high level and of limited value.</p>	<p><i>Amend HHP-8 as follows:</i></p> <p><b>New buildings and structures, and modifications to existing non-scheduled buildings on the site of a heritage building or structure</b></p> <p>Provide for new buildings and structures, and modifications to existing non-scheduled buildings and structures on the same site <u>as scheduled</u> heritage buildings or heritage structures where it can be demonstrated that the work does not detract from the identified heritage values, having regard to:</p> <ol style="list-style-type: none"> <li>1. The extent to which the work: <ol style="list-style-type: none"> <li>a. Is compatible with the scale, form, proportion and materials of <u>the scheduled</u> heritage building or heritage structure;</li> <li>b. Respects the identified relationship of the heritage building or heritage structure with its setting; and</li> </ol> </li> </ol>

					<p><del>c.—Fulfills the intent of the <a href="#">Heritage Design Guide</a>.</del></p> <p><a href="#">Note – Please refer to the Heritage Design Guide for further guidance</a></p>
107.	Historic Heritage	HH-P11	Support in part	<p>Kāinga Ora generally supports a policy to manage the heights of development within heritage zones to recognise the scale of the heritage areas. The form of development does not relate to the height of the building as this is covered by HHP-13 and HHp-14. In addition, the height of development should be cognisant of the heights that the Zone generally provides for and the existing height of buildings in the area.</p>	<p><i>Amend HH-P11 as follows:</i></p> <p><b>Height of development in heritage areas</b></p> <p>Manage the height of development to recognise and respect the <a href="#">unique setting of the form and scale</a> heritage areas <a href="#">in conjunction with</a> the City Centre Zone, Centre Zones and the Waterfront Zones <a href="#">in which the development occurs</a>.</p>
108.	Historic Heritage	HH-P14	Support in part	<p>Kāinga Ora generally supports a policy to provide for new buildings and structures. However blanket reference to the extent to which work fulfills the intent of the Heritage Design Guide is considered unnecessary when the other arms of the Policy provide adequate guidance as to which matters need to be considered. Kāinga Ora therefore seeks the Policy focuses on the identified heritage values outlined in the Wellington Heritage Inventory balanced with the</p>	<p><b>New buildings and structures within heritage areas</b></p> <p>Provide for new buildings and structures within heritage areas where it can be demonstrated that the works will not detract from the identified heritage values of the heritage area, having regard to:</p> <ol style="list-style-type: none"> <li>1. The extent to which the work: <ol style="list-style-type: none"> <li>a. Respects any valued neighbourhood patterns of the heritage area including any predominant architectural style or design;</li> </ol> </li> </ol>



				<p>outcomes sought within the Zone the the buildings and structures are located within. The Heritage Design Guide should only be used as a reference document as the detail in the guide is high level and of limited value.</p>	<p>b. Is compatible with the scale, form, proportions, design and materials of the heritage area <u>and the role and function of the Zone ; and</u></p> <p>c. Is sited to maintain a consistent pattern of front façade alignment. <del>and</del></p> <p>d. <del>Fulfils the intent of the</del> <u>Heritage Design Guide</u></p> <p><u>Note – Please refer to the Heritage Design Guide for further guidance</u></p>
109.	Historic Heritage	HH-R2	Support	<p>Kāinga Ora supports permitting the demolition of non-scheduled heritage buildings on a heritage site as the building has no heritage value.</p>	<p><i>Retain as notified.</i></p>
110.	Historic Heritage	HH-R4 and HH-S2	Oppose	<p>Kāinga Ora opposes restrictions on non-heritage buildings on heritage sites as this will hinder development potential in high medium and high density areas where this will not affect built heritage values.</p> <p>HH-R2 permits partial and total demolition of non-scheduled buildings and structures on the site of heritage buildings and heritage structures. By comparison, Rule HH-R4 permits new buildings and</p>	<p><i>Delete reference to HH-S2 from rule HH-R4 or amend HH-S2 as follows:</i></p> <p><b>HH-R4</b></p> <p><b>New buildings and structures on the site of <u>scheduled</u> heritage buildings and heritage structures</b></p> <p>Activity status: <b>Permitted</b></p> <p><b>Where:</b></p>

				structures on the site of heritage buildings and heritage structures where HH-S2 is achieved. HH-S2 only applies to the MDRZ and HDRZ and only allows buildings and structures that are accessory to the primary residential building, located to the rear and less than 10m <sup>2</sup> . Given that the additional buildings are to the rear of, and accessory to, the primary residential building it is considered that the 10m <sup>2</sup> limit should be removed as this will generally avoid the building being visible from the street and interfering with the heritage character.	<p><del>a. — Compliance with <u>HH-S2</u> is achieved</del></p> <p><b>HH-S2</b></p> <p>1. Any new building or structure must be:</p> <p>a. Accessory to the primary residential building; <u>and</u></p> <p>b. Located to the rear of the primary residential building; <del>and</del></p> <p><del>c. — Smaller than 10m<sup>2</sup>.</del></p> <p><del>2. — Any new structure (excluding buildings provided for in <u>HH-S2.1</u>) must have a maximum height of 1.5m</del></p>
111.	Historic Heritage	HH-R5	Oppose in part	Kāinga Ora seeks amendments as HH-R2 permits partial and total demolition of non-scheduled buildings and Structures on the site of heritage buildings and heritage structures. However, HH-R5 only allows additions to non-scheduled buildings and structures on the site of a heritage buildings where HH-S3 is achieved. HH-S3 limits modifications to less than 10% and where there are no additional storeys to the existing building. Additions to buildings are covered by other general rules and standards	<p><i>Delete reference to HH-S3 from HH-R5 as follows:</i></p> <p><b>HH-R5</b></p> <p><b>Additions and alterations to non-scheduled buildings and structures on the site of heritage buildings and structures</b></p> <p>1. Activity status: <b>Permitted</b></p> <p><del>Where:</del></p> <p><del>a. — Compliance with <u>HH-S3</u> is achieved.</del></p>

				in the Heritage Overlay or underlying Zone so it is considered unnecessary to also control this matter here.	
112.	Historic Heritage	HH-R11	Oppose in part	Kāinga Ora seeks amendments as HH-S1 only allows minor Internal alterations and states that this Standard does not apply to non-heritage buildings. The rule should reflect this to be clear. Accordingly, Kāinga Ora seeks changes to the rule to improve clarity.	<p><i>Amend HH-R11 as follows:</i></p> <p><b>Additions, alterations and partial demolition of buildings and structures within a heritage area, including non-heritage buildings and structures</b></p> <p>1. Activity status: <b>Permitted</b></p> <p>Where:</p> <p>a. <u>non-heritage buildings and structures are affected; or</u></p> <p>b. <u>For heritage buildings and structures -</u> Compliance with <a href="#">HH-S1</a> is achieved</p> <p>Consequential changes to restricted discretionary activities to reflect that changes to non-heritage buildings are permitted.</p>
113.	Historic Heritage	HH-R13		Kāinga Ora opposes restrictions on new buildings and structures that are at the rear of the primary residential building as this will hinder development potential in high medium and high density areas where this will not affect heritage area values.	<p><i>Delete reference to HH-S2 from rule HH-R13 or amend HH-S2 as follows:</i></p> <p><b>HH-R13</b></p> <p><b>New buildings and structures within heritage areas</b></p> <p>Activity status: <b>Permitted</b></p>

				<p>Rule HH-R13 permits new buildings and structures within heritage areas where HH-S2 is achieved. HH-S2 only applies to the MDRZ and HDRZ and only allows buildings and structures that are accessory to the primary residential building, located to the rear and less than 10m<sup>2</sup>. Given that the additional buildings are to the rear of, and accessory to, the primary residential building it is considered that the 10m<sup>2</sup> limit should be removed as this will generally avoid the building being visible from the street and interfering with heritage character.</p>	<p><del>Where:</del></p> <p><del>b. Compliance with <u>HH-S2</u> is achieved</del></p> <p><b>HH-S2</b></p> <p>3. Any new building or structure must be:</p> <p>a. Accessory to the primary residential building; <u>and</u></p> <p>b. Located to the rear of the primary residential building; <del>and</del></p> <p><del>c. Smaller than 10m<sup>2</sup>.</del></p> <p><del>4. Any new structure (excluding buildings provided for in <u>HH-S2.1</u>) must have a maximum height of 1.5m</del></p>
114.	Historic Heritage	HH-S4	Oppose	<p>Kāinga Ora seeks that proposed height limits are amended to align with other relief relating to Zone provisions as the heights of buildings should be comparable with the underlying zone rather than the heritage provisions particularly at the interface with the underlying zone.</p>	<ol style="list-style-type: none"> <li>1. Amendments sought to align the Height limits with the changes sought in this submission within the underlying zone.</li> <li>2. Accept amendments to the underlying zone proposed in Appendix 4.</li> <li>3. Accept amendments to the Residential Zones and Centre Zones height and HIRTB standards proposed in this submission.</li> </ol>
<b>PART 2 – DISTRICT-WIDE MATTERS – SUBDIVISION</b>					

115.	Subdivision	Introduction	Support in part	<p>Kainga Ora generally supports the introduction but seeks amendments to clarify the effects of poorly designed subdivisions where the land use activities have not been designed. Further amendments are sought to clarify that the District Plan seeks to provide a more enabling framework for combined land use and subdivision resource consents.</p> <p>Further amendments are sought for clarity as it is considered that the explanation of the application of the objectives, policies and rules is confusing and does not provide further clarity, and that the objectives, policies and rules themselves should clearly describe how they apply.</p>	<p><i>Amendments sought</i></p> <p>...</p> <p>In addition to facilitating increased housing supply and choice, subdivision is related to the Council’s aims for a more sustainable and resilient future for Wellington. For example, poorly designed <u>vacant</u> lot subdivisions can limit neighbourhood connectivity and cohesion, entailing also longer travel times, greater reliance on private vehicle transport and associated increases in greenhouse gas emissions. In contrast, well-connected subdivisions can enhance community values and sense of place, and promote greater uptake of active and public transport modes.</p> <p>Poorly-designed <u>vacant</u> lot subdivisions can also lead to greater energy consumption an associated costs for home heating, relative to designs that make better use of solar aspect another renewable energy opportunities. <u>Objectives, policies, rules and standards included in the subdivision chapter seek to manage the effects of vacant lot subdivision.</u></p> <p>When subdivision and related land use activities are assessed concurrently, it enables a comprehensive understanding of the resulting pattern, scale and density of development. For this reason, the Council prefers combined subdivision and land use resource consent applications to be made wherever possible <u>and therefore the District Plan provides a more enabling framework for combined subdivision and land</u></p>
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					<p><del>use applications. However, it is understood that such an integrated approach is not always practicable or preferable for applicants, for a variety of reasons.</del></p> <p>Where buildings and activities are lawfully established prior to subdivision, the subdivision process may be little more than a formalisation of new property or unit boundaries to provide for separate ownership. Where subdivision precedes land use, the resulting development potential needs to be taken into account to ensure newly created allotments and units are of a size, shape and orientation that are fit-for-purpose and sympathetic to the local context.</p> <p>Subdivisions commonly lead to in an increase in intensity of land use activity, and <u>additional</u> steps <u>may</u> need to be taken <u>for vacant lot at subdivisions stage</u> to ensure existing and future activities can be serviced for access, water supply, wastewater disposal, stormwater management, telecommunications and power supply.</p> <p>Subdivision involving certain activities in close proximity to some network utilities also needs to be managed. The provisions in the subdivision chapter work together with provisions in the infrastructure and other chapters to achieve the Plan's aims regarding the operation, maintenance, development and upgrade of infrastructure.</p>
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					<p>Subdivisions adjacent to surface waterbodies and the CMA afford opportunities for greater access to these features to enhance a range of values. Esplanade reserves and esplanade strips will generally be required by the Council in such circumstances. Esplanades also provide opportunities to maintain or enhance conservation values associated with ecological characteristics of surface water and the coast, as well as natural hazard mitigation.</p> <p>Subdivision is only permitted in limited circumstances. <del>Under</del> Section 223 of the RMA, <del>a requires that a</del> survey plan for such subdivisions may be submitted to Council for approval provided that a certificate of compliance has been obtained for the subdivision and that certificate has not lapsed.</p> <p>This chapter includes objectives, policies and rules that relate to subdivision generally. It also includes policies and rules that implement objectives in other chapters, specifically as they relate to the management of subdivision.</p> <p><del>Rule SUB-R1 relates specifically to subdivision of land for the purpose of the construction and use of residential units in the Medium Density Residential Zone and the High Density Residential Zone. Subdivisions under Rule SUB-R1 are not subject to</del></p>
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					<p><del>Rules SUB-R2 – SUB-R5, but are subject to the area-specific and topic-specific rules where the land also contains a corresponding planning notation or overlay.</del></p> <p><del>With the exception of Rule SUB-R1, the general subdivision objectives, policies and rules apply to all subdivision proposals, including those that affect land subject to other planning map notations, areas, or overlays. To the extent relevant, this includes Objectives SUB-O1 and SUBO2, Policies SUB-P1 – SUB-P8, and Rules SUB-R2 – SUB-R5.</del></p> <p><del>In addition to those general provisions, the area-specific and topic-specific policies and rules apply to subdivisions affecting land subject to the applicable planning notation or overlay. This includes Policies SUB-P9 – SUB-P26, and Rules SUB-R6 – SUB-R31.</del></p>
116.	Subdivision	SUB-O1	Support in part	<p>Kāinga Ora generally supports the proposed objective but seeks minor amendments to recognise that the zone purpose, form and function along with amenity values will change overtime. This objective should align with Policy-5 that recognises the scale and intensity anticipated for the underlying zone.</p>	<p><b>Efficient pattern of development</b></p> <p>Subdivision achieves an efficient development pattern that:</p> <ol style="list-style-type: none"> <li>1. Maintains or enhances Wellington’s compact urban form;</li> <li>2. Is compatible with the nature, scale and intensity anticipated for the underlying zone <del>and local context</del>;</li> <li>3. Enables <u>flexibility, innovation and choice for appropriate</u> future development and use of resulting land or buildings; and</li> </ol>



					4. Is supported by development infrastructure and additional infrastructure for existing and anticipated future activities.
117.	Subdivision	NEW OBJECTIVE	Support	<p>Kāinga Ora seeks that an additional objective be added to the subdivision chapter which speaks directly to the outcomes sought for subdivision within or on land identified as having historical values, natural environmental values and coastal values.</p> <p>This addition is sought to set a clear overarching objective to the policies concerned with these environments which are more sensitive to change.</p>	<p>Insertion of additional objective as follows:</p> <p><b><u>SUB-O[number]</u></b></p> <p><b><u>Subdivision is managed in areas with identified historical values, natural environmental and coastal values, where subdivision can have adverse effects on the values that the District Plan seeks to manage or protect.</u></b></p>
118.	Subdivision	All Policies	Support in part	<p>Kāinga Ora seeks those headings are added to the chapter to categorise the policies to help with plan legibility and usability.</p>	<p><b><u>Insertion of policy headings as follows:</u></b></p> <p><b><u>Historic Heritage and Cultural Values:</u></b> <b><u>SUB-P8 – SUB-P13</u></b></p> <p><b><u>Natural Environment:</u></b> <b><u>SUB-P14 – SUB-P19</u></b></p> <p><b><u>Coastal Environment:</u></b> <b><u>SUB-P20 – SUB-P24</u></b></p> <p><b><u>Natural Hazards:</u></b></p>

					<u>SUB-P25 – SUB-P26</u>
119.	Subdivision	SUB-P1	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
120.	Subdivision	SUB-P2	Support in part	Kāinga Ora generally supports the policy with a minor amendment to recognise what is anticipated by the underlying zone.	<b>Boundary adjustments and amalgamation</b>  Enable boundary adjustments and site amalgamation to enhance the efficient use of land, provided that the nature and scale of resulting development potential is compatible with the <u>underlying zone local context</u> .
121.	Subdivision	SUB-P3	Support in part	Kāinga Ora generally supports the policy with amendments to provide the flexibility where practicable to achieve such outcomes as not all developments can achieve and attain all aspects in design and layout.  Amendments also sought to remove reference to renewable energy as it is already captured under ‘natural and physical resources.’	<del>Provide</del> <u>Encourage and promote</u> <del>for</del> subdivision design and layout that makes efficient use of <u>renewable energy and other</u> natural and physical resources, and delivers well-connected, resilient communities including development patterns that: <ol style="list-style-type: none"> <li>1. Maximise solar gain;</li> <li>2. Incorporate effective water sensitive design <u>where practicable</u>;</li> <li>3. <del>Achieve</del> <u>Provide for</u> hydraulic neutrality;</li> <li>4. Provide for safe vehicle access;</li> <li>5. Support walking, cycling and public transport opportunities and enhance neighbourhood and network connectivity and safety; and</li> <li>6. Are adaptive to the effects of climate change.</li> </ol>
122.	Subdivision	SUB-P4	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>

123.	Subdivision	SUB-P5	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
124.	Subdivision	SUB-P6	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
125.	Subdivision	SUB-P7	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
126.	Subdivision	SUB-P8	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
127.	Subdivision	SUB-P9	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
128.	Subdivision	SUB-P10	Support in part	Kāinga Ora generally supports this policy but seeks amendments to remove reference to whether covenants or consent notices can be imposed on new allotment to manage any anticipated development. Anticipated development is provided for within the framework of the underlying zone and relevant district plan provisions, and covenants and consent notices are tools that are currently provided for when necessary and appropriate under current legislation.	<p><b><u>Subdivision of land on which a heritage building, or heritage structure is located</u></b></p> <p>Provide for the subdivision of land on which heritage buildings and heritage structures are located, having regard to:</p> <ol style="list-style-type: none"> <li>1. The identified relationship and contribution of the setting and surroundings of the site to the values of the heritage building or heritage structure;</li> <li>2. The extent to which the subdivision would retain an appropriate setting for the heritage building or heritage structure; and</li> <li>3. <del>Whether covenants or consent notices can be imposed on any new allotment to manage any anticipated development.</del></li> </ol>

129.	Subdivision	SUB-P11	Support in part	<p>Kāinga Ora generally supports this policy but seeks amendments to remove reference to whether covenants or consent notices can be imposed on new allotment to manage any anticipated development, as consistent with the relief sought within this submission.</p>	<p><b>Subdivision within heritage areas</b></p> <p>Provide for the subdivision of land within heritage areas, having regard to:</p> <ol style="list-style-type: none"> <li>1. The extent to which the subdivision and any anticipated development would detract from the identified heritage values; and</li> <li><del>2. Whether covenants or consent notices can be imposed on any</del></li> </ol>
130.	Subdivision	SUB-P12	Support in part	<p>Kāinga Ora generally supports this policy but seeks amendments to remove reference to whether covenants or consent notices can be imposed on new allotment to manage any anticipated development, as consistent with the relief sought within this submission.</p>	<p><b>Subdivision of land containing a scheduled archaeological site</b></p> <p>Provide for the subdivision of land containing a scheduled archaeological site, having regard to:</p> <ol style="list-style-type: none"> <li>1. The location of site access and new structures in relation to the scheduled archaeological site;</li> <li>2. The extent to which the subdivision and any anticipated development would adversely affect archaeological values;</li> <li>3. The findings of any advice by a suitably qualified heritage professional;</li> <li>4. The outcomes of any consultation with Heritage New Zealand Pouhere Taonga; and</li> <li><del>5. Whether controls such as covenants or consent notices can be imposed on any new allotment to manage anticipated development.</del></li> </ol>

131.	Subdivision	SUB-P13	Support in part	Kāinga Ora generally supports this policy but seeks amendments to remove reference to whether covenants or consent notices can be imposed on new allotment to manage any anticipated development, as consistent with the relief sought within this submission.	<p><b>Subdivision of land containing a notable tree</b></p> <p>Require subdivision of land containing notable trees to support the maintenance of tree health and minimise the potential for interference, having regard to:</p> <ol style="list-style-type: none"> <li>1. The extent to which the location of new boundaries relative to the notable tree and any anticipated development will increase the risk of the interference with property;</li> <li>2. <del>Whether controls such as consent notices or covenants can be imposed on any new allotment;</del> and</li> <li>3. Whether site access and new utilities can be located outside of the root protection area of the notable tree.</li> </ol> <p>Consequential renumbering will be required.</p>
132.	Subdivision	SUB-P25	Support	Kāinga Ora generally supports this policy.	<i>Retain as notified.</i>
133.	Subdivision	SUB-all rules	Support in part	Kāinga Ora supports the introduction of notification preclusion statement (for both public and limited notification) for restricted discretionary activities and seeks that this is applied to all restricted discretionary activities.	<p><b><u>Notification:</u></b></p> <p><u>Applications under this rule are precluded from being publicly or limited notified in accordance with section 95A or section 95B of the RMA.</u></p>

				<p>The technical nature of these breaches requires technical and/or engineering assessments, and public participation by way of limited or public notification will unlikely add anything to the consideration of the effects of these breaches.</p> <p>Particularly, the notification statuses for SUB-R1 generally relate to the land use activity and associated standards, and the subdivision itself is not generating additional effects that should trigger notification.</p> <p>Amendments sought.</p>	
134.	Subdivision	SUB-All Rules	Oppose	<p>Kāinga Ora opposes the matter of control and matter of discretion to 'any consent notices, covenants, easements or other legal instructed necessary' with all controlled and restricted discretion activities. This should not be a determining matter for discretion when granting consent. Anticipated development is provided for within the framework of the underlying zone and relevant district plan provisions, and covenants and consent notices are tools that are currently provided for</p>	<p><i>Delete matter of discretion as follows:</i></p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <li>1. The matters in ...</li> <li>2. The ...</li> <li>3. Site ...</li> <li><del>4. Any consent notices, covenants, easements or other legal instruments necessary.</del></li> </ol>

				when necessary and appropriate under current legislation. Deletion sought in all rules.	
135.	Subdivision	SUB-All Rules	Oppose	Kāinga Ora opposes the inclusion of design guides as a statutory document and matter of discretion with the rules. Design guides should act as a tool to give effect to the outcomes in the objectives and policies of the chapter. Deletion sought in all rules.	<i>Deletion of references to design guides sought throughout all rules.</i>
136.	Subdivision	SUB-R1	Support in part	Kāinga Ora generally supporting this rule but seeks amendments to the matters of control which would be more appropriate as standards that are required to be complied with, and as consistent with other rules in this chapter.  Consequential changes are sought to the numbering.	<p>1. Activity status: <b>Controlled</b></p> <p><i>Amendments sought to include additional matter of control as follows:</i></p> <p>....</p> <p><i>Matters of control are:</i></p> <ol style="list-style-type: none"> <li>1. The provision of practical, physical and legal access from each allotment directly to a formed legal road or by registered right of way;</li> <li>2. <u>Whether the subdivision necessitates a joint land use application.</u></li> <li>3. <u>Compliance with SUB-S1, SUB-S2, SUB-S3, SUB-S4, and SUB-S5</u></li> </ol>

					<p><del>3.—The provision of a water supply connection to the Council’s reticulated water supply system for each allotment sufficient to meet the levels of service in the Wellington Water Regional Standard for Water Services 2022 and the requirements of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008;-</del></p> <p><del>4.—The provision of a wastewater disposal connection to Council’s reticulated wastewater system for each allotment sufficient to meet the level of service in the Wellington Regional Standard for Water Services 2022;-</del></p> <p><del>5.—The provision of a stormwater connection to Council’s reticulated stormwater system for each allotment sufficient to meet the level of service in the Wellington Regional Standard for Water Services 2022;-</del></p> <p><del>6.—The provision of fibre optic cable connections to the legal boundary of each allotment;-</del></p> <p><del>7.—The provision of electricity connections to the legal boundary of each allotment; and</del></p> <p><del>8.—Any consent notices, covenants, easements or other legal instruments necessary.</del></p>
137.	Subdivision	SUB- R2 SUB-R3 SUB-R4	Support in part	Kāinga Ora generally supports these rules, subject to the relief sought in this submission.	<i>Amendments sought in this submission. Accept changes sought in this submission that are linked to R2, R3, R4.</i>



138.	Subdivision	SUB-R5	Support in part	<p>Kāinga Ora generally supports this rule but seeks that a minimum shape standard is provided for vacant lot subdivision to manage the creation of lot sizes that do not support the outcomes of the underlying zone. Proposed minimum lot size and shape are sought through amendments to SUB-S6.</p> <p>Further, Kainga Ora seeks the introduction of a Discretionary Activity status for when minimum lot size and shape standards are not met. This activity status is considered appropriate as vacant lot subdivision that does not meet proposed minimum lot size and shape should not be anticipated within the zone.</p>	<p><i>Amendments sought.</i></p> <p>.....</p> <p>4. Activity status: <b>Discretionary</b></p> <p>Where:</p> <p>a. The subdivision is not a controlled activity under SUB-R5.1 or a restricted discretionary activity under SUB-5.2 or SUB-5.3;</p> <p>b. <u>Compliance with SUB-S6 is not achieved.</u></p>
139.	Subdivision	SUB-R17 SUB-R18 SUB-R20 SUB-R21 SUB-R23 SUB-R24 SUB-R25	Oppose in part	<p>Consistent with the rest of the submission, Kāinga Ora opposes the inclusion of flood hazard overlays in District Plan maps and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.</p> <p>Amendments sought.</p>	<p><i>Amendments sought.</i></p> <p>1. Activity status: <b>Controlled</b></p> <p>Where:</p> <p>a. The building platform is not located within an identified Overland Flowpath <del>of the Flood Hazard Overlay</del>; and/or</p>

					<p>b. The building platform is not located within a Stream Corridor <del>of the Flood Hazard Overlay</del>.</p> <p>Matters of Control are limited to:</p> <ol style="list-style-type: none"> <li>1. The matters in SUB-P1, SUB-P3, SUB-P4, SUB-P5, SUB-P7;</li> <li>2. Site access and the design of any vehicle parking and associated manoeuvring areas proposed; and</li> <li>3. <del>Any consent notices, covenants, easements or other legal instruments necessary.</del></li> </ol>
140.	Subdivision	SUB-R21 SUB-R25	Oppose	<p>Kāinga Ora opposes this rule as it would prevent subdivision for residential activities in existing urban areas subject to coastal hazards such as Kilbirnie.</p> <p>Kāinga Ora seeks amendments to change the activity status to Discretionary to allow for the potential for managing the hazard risk for residential activities.</p>	<p><i>Amend SUB-R21 and SUB-R25 as follows:</i></p> <ol style="list-style-type: none"> <li>1. Activity status: <b><u>Non-Complying-Discretionary</u></b></li> </ol>
141.	Subdivision	SUB-R6	Support in part	<p>Kāinga Ora generally supports this standard but seeks amendments for the exclusion of minimum lot size requirements and limits as applied by this standard. However, considers that the minimum lot size in the Metropolitan Centre, Local Centre, Neighbourhood Centre, Mixed Use</p>	<p><i>Amend SUB-S6 as follows:</i></p> <p><b>Number, size and shape of <u>vacant</u> allotments</b></p> <p>The following maximum <u>vacant</u> allotment number and minimum size and shape limits must be complied with for any fee simple subdivision:</p>

				<p>and General Industrial Zone should be nil as well. Applying a minimum lot size is considered inconsistent with SUB-O1, SUB-P1 and SUB-P5.</p> <p>Aligned with the feedback above, Kāinga Ora also seeks that a minimum shape factor standard is added for vacant allotments.</p> <p>The matters of control that apply to the creation of a vacant allotment ensure appropriate consideration is given to the feasible development of all vacant allotments which is considered sufficient to ensure small, undevelopable lots do not result.</p> <p>Aligned to the feedback above, Kāinga Ora seeks the deletion to any reference of legal instruments as a matter of assessment criteria for considering and determining consent applications.</p> <p>Amendments sought.</p>	<p>.....</p> <table border="1"> <thead> <tr> <th>Standard</th> <th>Limit</th> </tr> </thead> <tbody> <tr> <td colspan="2"><b>Vacant Allotments</b></td> </tr> <tr> <td><u>Minimum allotment shape</u></td> <td><u>Accommodate a rectangle of 8m x 15m.</u></td> </tr> <tr> <td colspan="2"><b>Metropolitan Centre, Local Centre, Neighbourhood Centre, Mixed Use &amp; General Industrial Zones</b></td> </tr> <tr> <td>5. Maximum number of allotments</td> <td>Nil</td> </tr> <tr> <td>6. minimum allotment size</td> <td><u>Nil 500m<sup>2</sup></u></td> </tr> <tr> <td>7. minimum allotment shape</td> <td>Nil</td> </tr> </tbody> </table> <p>Assessment Criteria where the standard is infringed:</p> <ol style="list-style-type: none"> <li>1. The extent to which <del>a higher density of</del> development is compatible with the <u>anticipated zone purpose, form and function local site context</u>;</li> <li>2. Whether the size, shape and other physical characteristics of resulting allotments will enable feasible future development of a nature and scale that is generally anticipated by the relevant Zone provisions;</li> <li>3. The extent to which any adverse effects on privacy or sunlight access for neighbours can be managed by allotment size, shape, orientation and topography or by landscaping, restrictions on future buildings or other mitigation;</li> <li>4. The extent to which clustering of smaller allotments and associated buildings in the Rural Zone is appropriate to the local rural character and the overall maintenance of</li> </ol>	Standard	Limit	<b>Vacant Allotments</b>		<u>Minimum allotment shape</u>	<u>Accommodate a rectangle of 8m x 15m.</u>	<b>Metropolitan Centre, Local Centre, Neighbourhood Centre, Mixed Use &amp; General Industrial Zones</b>		5. Maximum number of allotments	Nil	6. minimum allotment size	<u>Nil 500m<sup>2</sup></u>	7. minimum allotment shape	Nil
Standard	Limit																		
<b>Vacant Allotments</b>																			
<u>Minimum allotment shape</u>	<u>Accommodate a rectangle of 8m x 15m.</u>																		
<b>Metropolitan Centre, Local Centre, Neighbourhood Centre, Mixed Use &amp; General Industrial Zones</b>																			
5. Maximum number of allotments	Nil																		
6. minimum allotment size	<u>Nil 500m<sup>2</sup></u>																		
7. minimum allotment shape	Nil																		

					spaciousness, compared to a more dispersed development pattern; 5. <del>The effectiveness of any legal or instruments necessary to limit future intensification.</del>
<b>PART 2 – DISTRICT-WIDE MATTERS – GENERAL DISTRICT-WIDE MATTERS – COASTAL ENVIRONMENT</b>					
142.	Coastal Environment	Planning Maps/GIS Viewer	Support in part	Kāinga Ora seeks amendments to display the high, medium, and low coastal hazards as separate layers that can be turned on and off individually in the GIS viewer.	Amend the GIS viewer as described in this submission. Seeks amendments to display the high, medium, and low coastal hazards as separate layers that can be turned on and off individually in the GIS viewer.
143.	Coastal Environment	CE-O5	Support in part	<p>Kāinga Ora seeks amendments to this objective to better identify the effects of new subdivision, use and development may have on the existing environment.</p> <p>Kāinga Ora also seeks addition of the word “new” to this objective to recognise the additional impact that only new subdivision, use and development has on the existing environment.</p>	<p><i>Amend as follows:</i></p> <p><b>Risk from Coastal Hazards</b></p> <p><u>New S-subdivision</u>, use and development in the Coastal Hazard Overlays reduces or does not increase the risk to people, property, and infrastructure.</p>
144.	Coastal Environment	CE-O8	Support in part	Kāinga Ora seeks amendments to this objective to better identify the effects of new subdivision, use and development may have on the existing environment.	<p><i>Amend as follows:</i></p> <p><b>City Centre Zone</b></p> <p>Provide for a range of activities that maintain the vibrancy and vitality of the City Centre Zone, while also</p>

				Kāinga Ora also seeks the addition of the word “new” to this objective to recognise the additional impact that only new subdivision, use and development has on the existing environment.	ensuring that <u>new</u> subdivision, development and use in these areas do not increase the risk to people, property, and infrastructure.
145.	Coastal Environment	CE-P11	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
146.	Coastal Environment	CE-P12	Support in part	Kāinga Ora seeks amendments to this policy enable mitigation of hazard risk in high hazard areas.	<p><i>Amend CE-P12 as follows:</i></p> <p><u>New</u> Subdivision, use and development <del>reduces, or does not increase</del> the risk to people, <del>property,</del> and infrastructure by:</p> <ol style="list-style-type: none"> <li>1. Enable subdivision, use and development that have either low occupancy, risk, or replacement value within the Coastal Hazard Overlays;</li> <li>2. Requiring mitigation for subdivision, use and development that addresses the impacts from the relevant coastal hazards to people, property, and infrastructure in the <del>low and medium hazard hazard</del> areas; <del>and</del></li> </ol> <p><del>Avoiding subdivision, use and development in the high hazard area unless there is an functional and operational need for the building or activity to be located in this area and incorporates mitigation measures are incorporated that reduces the risk to people, property, and infrastructure.</del></p>

147.	Coastal Environment	CE-P14	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
148.	Coastal Environment	CE-P15	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
149.	Coastal Environment	CE-P16	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
150.	Coastal Environment	CE-P17	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
151.	Coastal Environment	CE-P18	Support in part	Kāinga Ora seeks amendments to this policy to enable the potential for these activities to be provided in some circumstances where the risks can be managed through mitigation measures.	<p><b>Hazard sensitive activities and potentially hazard sensitive activities in the high coastal hazard area</b></p> <p><del>Avoid</del> <u>Only allow</u> Hazard sensitive activities and potentially hazard sensitive activities in the high coastal hazard area or any subdivision where the building platform for a potentially hazard sensitive activity or hazard sensitive activity will be within the high coastal hazard area where it can be demonstrated that:</p> <ol style="list-style-type: none"> <li>1. The activity, building or subdivision has an operational or functional need to locate within the high coastal hazard area and locating outside of these high coastal hazard areas is not a practicable option; <u>or is within an existing urban area;</u></li> <li>2. The activity, building, or subdivision incorporates measures that demonstrate that <u>it reduces</u> or <u>does</u> not increase the risk to people, and property from the coastal hazard;</li> </ol>

					<p>3. There is the ability to access safe evacuation routes for occupants of the building from the coastal hazard; and</p> <p>4. The activity does not involve the removal or modification of a natural system or feature that provides protection to other properties from the natural hazard.</p>
152.	Coastal Environment	CE-P21	Oppose	<p>Kāinga Ora does not support this policy as notified. This policy places inappropriate restrictions on the City Centre Zone.</p> <p>Kāinga Ora seeks the deletion of this policy and considers more appropriate outcomes are achieved by CE-P22.</p>	<i>Delete policy and any reference to this policy in the PDP.</i>
153.	Coastal Environment	CE-P22	Support	Kāinga Ora generally supports the policy as notified.	<i>Retain as notified.</i>
154.	Coastal Environment	CE-R12	Oppose	<p>Kāinga Ora does not support this rule as notified.</p> <p>The permitted activity criteria relate to the development standards of the underlying zoning as opposed to any coastal environment criteria. As such, it is not clear what this rule is trying to achieve until the matters of discretion are applied. Kāinga Ora</p>	<p><i>Amendments sought.</i></p> <p>Kāinga Ora seeks that this rule be redrafted to include permitted activity criteria which relate to the coastal environment, and the outcomes of this chapter which are trying to be achieved.</p>

				does not support this rule as notified.	
155.	Coastal Environment	CE-R14	Oppose	<p>Kāinga Ora does not support this rule as notified.</p> <p>The permitted activity criteria relate to the development standards of the underlying zoning as opposed to any coastal environment criteria. As such, it is not clear what this rule is trying to achieve until the matters of discretion are applied.</p>	<p><i>Amendments sought.</i></p> <p>Kāinga Ora seeks that this rule be redrafted to include permitted activity criteria which relate to the coastal environment, and the outcomes of this chapter which are trying to be achieved.</p>
156.	Coastal Environment	CE-R15	Oppose	<p>Kāinga Ora does not support this rule as notified.</p> <p>The permitted activity criteria relate to the development standards of the underlying zoning as opposed to any coastal environment criteria. As such, it is not clear what this rule is trying to achieve until the matters of discretion are applied.</p>	<p><i>Amendments sought.</i></p> <p>Kāinga Ora seeks that this rule be redrafted to include permitted activity criteria which relate to the coastal environment, and the outcomes of this chapter which are trying to be achieved.</p>
157.	Coastal Environment	CE-R27	Support in part	<p>Kāinga Ora seeks amendments to this rule to change the activity status of <i>Hazard Sensitive Activities</i> within the <i>High Coastal Hazard Area</i> from Non-Complying to Discretionary to enable the potential for these activities to be provided where the risks can be managed through mitigation measures.</p>	<p><i>Amend CE-R27 as follows:</i></p> <ol style="list-style-type: none"> <li>1. Activity status: <b><u>Non-Complying-Discretionary</u></b></li> </ol>



				This would be consistent with the way Hazard Sensitive Activities are treated within the Overland Flowpaths in the Natural Hazards Chapter.	
<b>PART 2 – DISTRICT-WIDE MATTERS – GENERAL DISTRICT-WIDE MATTERS – EARTHWORKS</b>					
158.	Earthworks	EW-O1	Support in part	<p>Kāinga Ora generally supports this objective but seeks an amendment to be more specific with regard to the effect being managed. Kāinga Ora consider “visual amenity values” is too vague in the context of earthworks assessment.</p> <p>Amendments sought.</p>	<p><b>Management of Earthworks</b></p> <p>Earthworks are undertaken in a manner that:</p> <ol style="list-style-type: none"> <li>1. Is consistent with the anticipated scale and form of development for the zone;</li> <li>2. Minimises adverse effects on <del>visual amenity values, including changes to</del> <u>the appearance of</u> natural landforms;</li> <li>3. Minimises erosion and sediment effects beyond the site</li> <li>4. Minimises risks associated with slope instability; and</li> <li>5. Protects the safety of people and property</li> </ol>
159.	Earthworks	EW-P2	Support in part	<p>Kāinga Ora generally supports this policy but seeks an amendment to be more specific with regard to the effect being managed. Kāinga Ora consider “visual amenity” is too vague in the context of earthworks assessment.</p> <p>Amendments sought.</p>	<p><b>Provision for minor earthworks</b></p> <p>Enable the efficient use and development of land by providing for earthworks and associated structures where:</p> <ol style="list-style-type: none"> <li>1. The risk associated with instability is not increased;</li> <li>2. Erosion, dust and sedimentation effects on land and water bodies will be minimal; and</li> </ol>

					3. <u>The appearance of earthworks</u> <del>Effects on visual amenity</del> would be insignificant.
160.	Earthworks	EW-P3	Support in part	<p>Kāinga Ora generally supports this policy but considers reference to examples can be removed to simplify this policy.</p> <p>Amendments sought.</p>	<p><b>Maintaining stability</b></p> <p>Require earthworks to be designed and carried out in a manner that maintains slope stability and minimises the risk of slope failure associated with natural hazards. <del>such as earthquakes and increased rainfall intensities arising from climate change.</del></p>
161.	Earthworks	EW-P5	Support in part	<p>Kāinga Ora generally supports this policy but seeks an amendment to be more specific with regard to the effect being managed. Kāinga Ora consider “visual amenity” is too vague in the context of earthworks assessment.</p> <p>Amendments sought.</p>	<p><b>Effects on earthworks on landform and visual amenity</b></p> <p>Require earthworks and associated structures, including structures used to retain or stabilise landslips, to be designed and constructed to minimise adverse effects on <u>the appearance of</u> natural landforms <del>and visual amenity</del> and where located within identified ridgelines and hilltops ensure the effects are mitigated or remedied.</p>
162.	Earthworks	EW-R6	Support	<p>Kāinga Ora supports the inclusion of non-notification clauses.</p>	<p><i>Retain as notified.</i></p>
163.	Earthworks	EW-R17	Support in part	<p>Kāinga Ora generally supports however considers the ability to undertake earthworks associated with natural hazard mitigation as a permitted activity should extend</p>	<p><b>Earthworks associated with natural hazard mitigation works within the Flood Hazard Overlays and Coastal Hazard Overlays</b></p> <p>1. <i>Activity Status: Permitted</i></p>

				beyond the parties currently listed in this rule. Amendments sought	Where: a. The natural hazard mitigation works are undertaken by a Central Government Agency, GWRC, the Council, <i>Kāinga Ora</i> , or a nominated contractor or agent of the express purpose of natural hazard mitigation.
164.	Earthworks	EW-S1	Support in part	<p>Kāinga Ora supports this standard in part.</p> <p>Amendments are sought to ensure this assessment criteria reflect the effects sought to be managed, and to align with the objectives and policies of the chapter. It is considered the current wording of the assessment criteria is not supported by the overarching objectives and policies.</p> <p>Kāinga Ora also queries and seeks amendments to the thresholds for permitted activity earthworks across the different zone to recognise that different thresholds are appropriate across different zones.</p> <p>Amendments sought.</p>	<p><b>Area</b></p> <p><b><u>Medium Density Residential Zone, High Density Residential Zone, and Neighbourhood Centre Zone</u></b></p> <p>1. The total area of earthworks must not exceed 250m<sup>2</sup> per site in any 12 month period.</p> <p><b><u>Local Centre Zone, Commercial Zone, Mixed Use Zone, Metropolitan Zone, City Centre Zone, General Industrial Zone, Open Space Zone, Natural Open Space Zone, and Sport and Recreation Zone, All Special Purpose Zones</u></b></p> <p>2. <u>The total area of earthworks must not exceed 500m<sup>2</sup> per site in any 12 month period.</u></p> <p><b><u>General Rural Zone, Large Lot Residential Zone, All Development Areas</u></b></p> <p>3. <u>The total area of earthworks must not exceed 1000m<sup>2</sup> per site in any 12 month period.</u></p> <p>Assessment criteria where the standard is infringed:</p>

					<ol style="list-style-type: none"> <li>1. Whether the stability of land or buildings or structures in or on the site or adjacent sites is likely to be adversely affected;</li> <li>2. The extent to which the earthworks will reflect and be sympathetic to the natural qualities of the surrounding landform</li> <li>3. The effectiveness of measures to retain dust, silt and sedimentation on site during the course of earthworks;</li> <li>4. The extent to which the earthworks are designed and will be managed in accordance with the principles and methods in the GWRC's Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region 2022; and</li> <li><del>5. For applications involving areas of earthworks exceeding 1000m<sup>2</sup> in any 12 month period, the results of an ecological survey conducted by a suitably qualified expert.</del></li> </ol>
165.	Earthworks	EW-S2	Support in part	<p>Kāinga Ora supports this standard in part</p> <p>Amendments are sought to align the matters of discretion more appropriately with the issue being managed by this standard, in this case stability and visual effects resulting from cut faces/retaining structures.</p>	<p><b>Cut height and fill depth</b></p> <p>....</p> <p>Assessment criteria where the standard is infringed:</p> <ol style="list-style-type: none"> <li>1. Whether the nature of the proposal or the site and the surrounding land necessitates a geotechnical assessment of the geology of the site and the surrounding land;</li> </ol>

				<p>With respect to the management of visual effects, it is considered that reference to examples can be removed to simplify this policy.</p> <p>Amendments sought. Consequential changes to numbering are also sought.</p>	<ol style="list-style-type: none"> <li>2. Whether the earthworks and associated structures have been designed by an appropriately qualified and experienced person;</li> <li>3. Whether an appropriately qualified and experienced person will supervise the earthworks and construction of associated structures and certify them on their completion;</li> <li>4. Whether a retaining or stabilising structure or building will be used to support or stabilise the earthworks and the efficacy of the structure or building;</li> <li>5. Whether the nature of the proposal or the site and the surrounding land and the extent and risk of instability means:             <ol style="list-style-type: none"> <li>a. That an earthworks and/or construction plan to define acceptable performance standards for environmental and amenity protection and public safety during the construction process is necessary; or</li> <li>b. That the design of any stabilising structure or building can be assessed at a later date under the building consent process;</li> </ol> </li> <li>6. Whether the earthworks are designed in accordance with the relevant provisions of:             <ol style="list-style-type: none"> <li>a. The earthworks and design construction criteria in the Wellington City Council Code of Practice for Land Development 2012;</li> <li>b. NZS 4404:2010 Land Development and Subdivision Engineering; and</li> </ol> </li> </ol>
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					<p>c. NZS 4431:1989 Code of Practice for Earth Fill for Residential Earthworks.</p> <p><del>7.—The effectiveness of measures to retain dust, silt and sediment on site during the course of earthworks;</del></p> <p><del>8.—The extent to which the earthworks are designed and will be managed in accordance the principles and methods in the GWRC’s Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region 2021;</del></p> <p><del>9.</del></p> <p><u>7.</u> The need for, and effectiveness of, measures to reduce the visual prominence and particularly visual intrusiveness of the earthworks, <del>and any buildings and other structures associated with or subsequently located on them, including:</del></p> <p><del>a.—Designing and engineering to reflect natural landforms and natural features such as cliffs, escarpments, streams and wetlands;</del></p> <p><del>b.—Avoiding unnatural scar faces;</del></p> <p><del>c.—Favouring untreated cut faces over artificial finishes in areas where bare rock is common;</del></p> <p><del>d.—Favouring alternatives to the use of sprayed concrete on cut faces, such as anchored netting;</del></p> <p><del>e.—Designing and finishing retaining walls or stabilising structures to reflect existing buildings and structures, in urban settings;</del></p>
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					<p>f. <del>Designing and finishing retaining walls or stabilising structures to reduce their apparent size by, for example, employing features that break up the surface area and create patterns of light and shadow;</del></p> <p>g. <del>Retaining existing vegetation above, below and at the sides of earthworks and associated structures;</del></p> <p>h. <del>Integrating new landscaping and associated planting to conceal or soften the appearance of earthworks and associated structures;</del></p> <p>i. <del>Concealing views of earthworks and associated structures from streets, other public places and other properties through the positioning of proposed or future buildings; and</del></p> <p>j. <del>Placing pipes below ground or integrating them into earthworks and associated structures.</del></p>
<b>PART 2 – DISTRICT-WIDE MATTERS – GENERAL DISTRICT-WIDE MATTERS – NOISE</b>					
166.	Noise	NOISE-O1	Support in part	<p>Kāinga Ora supports this objective in part; however, amendments are sought to articulate the balance more clearly between providing for noise generating activities, whilst appropriately managing effects on the community. Amendments sought.</p>	<p><b>Managing noise generation and effects</b></p> <p>Amenity values and peoples’ health and well-being are <del>not compromised</del> <u>protected</u> from adverse noise <del>generating activities—levels</del>, consistent with the anticipated outcomes for the receiving environment.</p>

167.	Noise	NOISE-O2	Oppose	Kāinga Ora opposes this objective. Noise generating activities should not compromise health and well-being. Deletion sought.	<i>Deletion of policy and any references to this policy.</i>
168.	Noise	NOISE-P1	Support in part	While Kāinga Ora supports enabling the generation of noise where appropriate, it does not support requiring amenity values to be maintained. The District Plan should recognise that amenity values change over time. Amendments sought.	<b>General management of noise</b>  Enable the generation of noise from activities that: <ol style="list-style-type: none"> <li>1. <del>Maintain</del> <u>Are compatible with</u> the <u>anticipated</u> amenity values of the receiving environment; and</li> <li>2. <del>Does</del> not compromise the health, safety and wellbeing of people and communities.</li> </ol>
169.	Noise	NOISE-P2	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
170.	Noise	NOISE-P3	Oppose in part	While Kāinga Ora supports the provision of a higher noise level to be able to be generated in the identified zones, the policy as notified reads overly ambiguous with no clear direction or outcome.	<i>Amendments sought.</i>
171.	Noise	NOISE-P4	Oppose in part	Kāinga Ora seeks amendments to the policy approach.	<b>Acoustic treatment for sensitive activities</b>  <u>Require Encourage and promote</u> sound insulation for new sensitive activities within: <ol style="list-style-type: none"> <li>1. The City Centre Zone;</li> <li>2. The Special Purpose Waterfront Zone;</li> <li>3. The Centres Zones;</li> <li>4. <del>The Mixed Use Zones;</del></li> </ol>



					<p><del>5.—The Port Noise Control Line;</del>  <del>6.—The Airport Air Noise Boundary; and</del>  <del>Identified corridors adjacent to the State Highways and Railway networks.</del></p>
172.	Noise	NOISE-P6	Oppose in part	<p>Kāinga Ora seeks amendments to the policy approach to enable noise sensitive activities within the Inner Air Noise Overlay where appropriate ventilation and acoustic insulation can be achieved.</p>	<p><b>Development restrictions on noise sensitive activities</b></p> <ol style="list-style-type: none"> <li>1. Restrict the development of noise sensitive activities within The Inner Air Noise Overlay <u>where ventilation and acoustic insulation standards are not met</u>; and</li> <li>2. Other locations where ventilation and acoustic insulation standards are not met.</li> </ol>
173.	Noise	All rules	Oppose	<p>Kāinga Ora seeks the introduction of notification preclusion statement (for both public and limited notification) for restricted discretionary activities. The technical nature of these breaches requires technical and/or engineering assessments, and public participation by way of limited or public notification will unlikely add anything to the consideration of the effects of these breaches. Amendments sought.</p>	<p><b><u>Notification:</u></b></p> <p><u>Applications under this rule are precluded from being publicly or limited notified in accordance with section 95A or section 95B of the RMA.</u></p>

174.	Noise	NOISE-S4 and NOISE-S5	Oppose in part	<p>Kāinga Ora seeks a review of the different insulation requirements for the inner and outer air noise overlay and to understand why these levels vary from the level required by the Quieter Homes Programme which is part of the Airport Noise Management Plan and Designation conditions. Clarification is also sought on the extent of the Quieter Homes Programme which appears to only cover the inner air noise overlay. The requirements proposed by the Plan in respect of acoustic insulation and ventilation are potentially onerous for landowners.</p>	<ol style="list-style-type: none"> <li>1. Seeks a review of the different insulation requirements for the inner and outer air noise overlay and to understand why these levels vary from the level required by the Quieter Homes Programme which is part of the Airport Noise Management Plan and Designation conditions.</li> <li>2. Clarification is also sought on the extent of the Quieter Homes Programme which appears to only cover the inner air noise overlay.</li> <li>3. Kāinga Ora seeks that any mitigation measures and/or Quieter Homes Programme applies to properties under both the inner and outer air noise overlay.</li> <li>4. Amendments may be necessary once further clarification and understanding is considered.</li> </ol>
175.	Noise	NOISE-S13	Oppose in part	<p>Kāinga Ora seeks that the dwellings identified in Attachment 2 of designation WIAL5 which are eligible for mechanical ventilation prior to construction activity in the East Precinct are also provided with acoustic insulation in accordance with the standards identified in NOISE-S4. The Quieter Homes Programme has a lesser standard of acoustic insulation, requiring they are designed to</p>	<ol style="list-style-type: none"> <li>1. Seeks that the dwellings identified in Attachment 2 of designation WIAL5 which are eligible for mechanical ventilation prior to construction activity in the East Precinct are also provided with acoustic insulation in accordance with the standards identified in NOISE-S4.</li> <li>2. Amendments may be necessary once further clarification and understanding is considered.</li> </ol>

				achieve an indoor design sound Level of 45 dB Ldn or less, whereas NOISE-S4 and NOISE-S5 require acoustic insulation to achieve a minimum external to internal noise reduction for habitable rooms of not less than 30 or 35 dB.	
<b>PART 2 – DISTRICT-WIDE MATTERS – GENERAL DISTRICT-WIDE MATTERS – WIND</b>					
176.	Wind	WIND – R1	Support in Part	A number of changes to building height have been sought throughout this submission. Heights of buildings are restricted to between 12-20m depending on Centre type. These heights should be adjusted to better align with the height limits sought in the relevant centres to not preclude development necessary to have a quality urban environment.	Amend the height limits in WIND-R1 to align with those heights sought in other submission points within this submission.
177.	Wind	All rules /section	Support	Rules in the Wind section should apply to the Medium Density Residential Zone and High Density Residential Zone, as there will be rules providing for buildings over 20m. These zones are currently not included.	Seek the inclusion of Medium Density Residential Zone and High Density Residential Zone in this chapter and applicable to the rules and standards, where buildings go over 20m in height.

**PART 3 – AREA SPECIFIC MATTERS – ZONES – RESIDENTIAL – MEDIUM DENSITY RESIDENTIAL ZONE**

178.	Medium Density Residential Zone	Introduction	Oppose in part	<p>Kāinga Ora generally supports the introduction and in particular the provision of medium density housing to give effect to the NPS-UD and the Act, but oppose the introduction of Character Precincts and different provisions related to the construction of 4 or more residential units.</p> <p>Kāinga Ora opposes the introduction of Character Precincts, Mt Victoria North Townscape Precinct or Oriental Bay Precinct within the MRZ and in zone chapters. These precincts do not fulfil the matters of national importance as set out under section 6(f) and the requirements under section 77L and 77R of the RMA, and therefore do not meet the threshold to be applied as a qualifying matter to restrict height and density. Instead, Kainga Ora seeks that a Character Overlay is introduced into District-wide matters.</p> <p>Consistent with the rest of its submission, Kāinga Ora seeks the deletion of the Multi-unit definition</p>	<ol style="list-style-type: none"> <li>1. Kāinga Ora seeks the deletion of MRZ-PREC01, MRZ-PREC02 and MRZ-PREC03 Introductions in their entirety.</li> <li>2. Kāinga Ora seeks amendments to the Introduction as follows:</li> </ol> <p>The Medium Density Residential Zone comprises predominantly residential activities with a moderate concentration and bulk of buildings, such as detached, semi-detached and terraced housing, low-rise apartments and other compatible activities.....</p> <p>The Medium Density Residential Zone adopts the medium density residential standards from the RMA which allow for three residential units of up to three storeys on a site.</p> <p><u>Developments of four or more residential units are also encouraged through the policy framework and provided for through a resource consent process. Multi-unit housing of four or more units is also anticipated through a resource consent process subject to standards and design guidance.</u></p> <p>It is anticipated that the form, appearance and amenity of neighbourhoods within the Medium Density Residential Zone will change over time.</p>
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				<p>and rules associated with this definition, and seeks that 4 or more dwellings is not classified as a different activity as the potential or actual effects of residential development should not be distinguished between building 3 and 4 (or more) residential units.</p> <p>Kāinga Ora also seek an amendment to the introduction to make it clear that incompatible activities in the MRZ will be managed or discouraged in line with a Discretionary / Non-Complying activity status.</p>	<p>There are parts of the Medium Density Residential Zone where the permitted development, height or density directed by the NPS-UD may be modified by qualifying matters. <b>These include the following:</b></p> <ul style="list-style-type: none"> <li>• <b>Character precincts and the Mt Victoria North Townscape Precinct (refer to MRZ-PREC01 and MRZ-PREC02).....</b></li> </ul> <p>Incompatible non-residential activities are <b>not anticipated managed or discouraged</b> in this zone.</p> <p><b>Precincts within the Medium Density Residential Zone include Character Precincts, the Mt Victoria North Townscape Precinct, and the Oriental Bay Height Precinct.</b></p>
179.	Medium Density Residential Zone	MRZ-O1	Support in part	<p>Kāinga Ora generally supports the objective but seeks amendments (or addition of a new objective or policy) to provide for additional height in density in areas in the MRZ with high accessibility to public transport, commercial amenity and community services.</p>	<p><i>Amend MRZ-O1 as follows or alternatively add a new objective or policy to address the matters raised by the amendment.</i></p> <p><b>Purpose</b></p> <p>The Medium Density Residential Zone provides for predominantly residential activities and a variety of housing types and sizes that respond to:</p> <ol style="list-style-type: none"> <li>1. Housing needs and demand; and</li> <li>2. The neighbourhood's planned urban built character, including 3 storey buildings, <b>and additional height and</b></li> </ol>

					<u>density in areas of high accessibility to public transport, commercial amenity and community services.</u>
180.	Medium Density Residential Zone	MRZ-O2	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified.</i>
181.	Medium Density Residential Zone	MRZ-O3	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified.</i>
182.	Medium Density Residential Zone	MRZ-PREC01-O1	Oppose	Consistent with the rest of the submission, Kāinga Ora seeks the deletion of Character Precincts and associated provisions from zone chapters and as a qualifying matter.	<i>Delete MRZ-PREC01-O1</i>
183.	Medium Density Residential Zone	MRZ-PREC02-O1	Oppose	Consistent with the rest of the submission, Kāinga Ora seeks the deletion of Character Precincts and associated provisions from zone chapters and as a qualifying matter.	<i>Delete MRZ-PREC02-O1</i>
184.	Medium Density Residential Zone	MRZ-PREC03-O1	Oppose	Consistent with the rest of the submission, Kāinga Ora seeks the deletion of Character Precincts and associated provisions from zone chapters and as a qualifying matter.	<i>Delete MRZ-PREC03-O1</i>

185.	Medium Density Residential Zone	MRZ-P1	Support in part	Kāinga Ora generally supports the policy, however, amendments are sought to the wording to better recognise the intent of the NPS-UD (particularly Policy 6) that recognises the planned urban built form and that change to existing amenity is not in itself an adverse effect.	<p>Amend MRZ-P1 as follows:</p> <p>Enable residential activities and other activities that are compatible with the purpose of the Medium Density Residential Zone, while ensuring their scale and intensity is consistent with the <u>amenity values</u> anticipated <u>and planned built form of</u> <del>for</del> the Zone, including:</p> <ol style="list-style-type: none"> <li>1. Home Business;</li> <li>2. Boarding Houses;</li> <li>3. Visitor Accommodation;</li> <li>4. Supported Residential Care;</li> <li>5. Childcare Services; and</li> <li>6. Community Gardens.</li> </ol>
186.	Medium Density Residential Zone	MRZ-P2	Support	Kāinga Ora generally supports the policy but seeks amendments (or addition of a new policy) to provide for additional height in density in areas in the MRZ with high accessibility to public transport, commercial amenity and community services.	<p><i>Amend MRZ-P2 as follows or alternatively add a new policy to address the matters raised by the amendment.</i></p> <p><b><i>Housing supply and choice</i></b></p> <p><i>Enable a variety of housing typologies with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments <u>up to 5 storeys in areas of in areas of high accessibility to public transport, commercial amenity and community services.</u></i></p>
187.	Medium Density Residential Zone	MRZ-P3	Support in part	Kāinga Ora generally supports the policy but seeks an amendment to remove reference to tenure to recognise that tenures and cannot and should not be managed through the District Plan.	<p><i>Amend MRZ-P3 as follows:</i></p> <p>Enable housing to be designed to meet the day-to-day needs of residents, and encourage a variety of housing types, <u>and</u> sizes <u>and tenures</u> to cater for people of all ages, lifestyles and abilities.</p>

188.	Medium Density Residential Zone	MRZ-P4	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
189.	Medium Density Residential Zone	MRZ-P5	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
190.	Medium Density Residential Zone	MRZ-P6	Oppose in part	<p>Kāinga Ora opposes this policy as proposed and seek the deletion of ‘multi-unit housing’ as a separate activity type from stand-alone houses or any other residential typology for the purposes of the zone rules and standards. Kāinga Ora considers that residential development should be considered on the basis of its effects and merits rather than specifically on typology or the scale/collective number of dwellings. Therefore, Kāinga Ora supports an amended policy that provides for residential activity beyond the permitted activity status and a framework that includes the outcome that the District Plan is seeking to achieve.</p> <p>Amendments are sought to the policy to allow reference to more than three residential units on a site</p>	<p><i>Amend MRZ-P6 as follows:</i></p> <p><b><u>Multi-unit housing- Higher density residential development</u></b></p> <p>Provide for <b><u>multi-unit housing more than three residential units per site</u></b> where it can be demonstrated that the development:</p> <ol style="list-style-type: none"> <li>1. <b><u>Fulfils the intent of the Residential Design Guide;</u></b>  <b><u>Achieves the following urban design outcomes:</u></b> <ol style="list-style-type: none"> <li>a. <b><u>Provides an effective public private interface;</u></b></li> <li>b. <b><u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood;</u></b></li> <li>c. <b><u>Provides high quality buildings;</u></b></li> <li>d. <b><u>Responds to the natural environment.</u></b></li> </ol> </li> <li>2. Provides a minimum area of private or shared outdoor living space that is sufficient to cater for the needs of future occupants;</li> </ol>



			<p>as these are managed through a resource consent process.</p> <p>Amendments sought throughout the District Plan with the deletion of any references of ‘multi-unit housing’ in objectives, policies, rules, and standards.</p> <p>Kāinga Ora also seek amendments to this policy to remove direct reference to the design guide as design guides should be removed from the Plan and treated as a non-statutory tool outside of the District Plan. Amendments are therefore sought to articulate the urban design outcomes that are sought and to recognise changing amenity in accordance with the NPS-UD.</p> <p>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</p>	<ol style="list-style-type: none"> <li>3. Provides an adequate and appropriately located area on site for the management, storage and collection of all waste, recycling and organic waste potentially generated by the development; and</li> <li>4. Is <u>adequately able to be</u> serviced by three waters infrastructure or can address any constraints on the site.</li> </ol> <p><u>Note: Best practice urban design guidance is contained within Council’s Design Guidelines.</u></p>
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				<p>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> <p>Kāinga Ora seek the opportunity to review these guidelines if they are to remain a statutory document.</p>	
191.	Medium Density Residential Zone	MRZ-P7	Support in part	<p>Kāinga Ora seek amendments to this policy to remove direct reference to the design guide as design guides should be removed from the Plan and treated as a non-statutory tool outside of the District Plan. Amendments are therefore sought to articulate the urban design outcomes that are sought and to recognise changing amenity in accordance with the NPSUD.</p> <p>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</p>	<p><i>Amend MRZ-P7 as follows:</i></p> <p>Provide for retirement villages where it can be demonstrated that the development:</p> <ol style="list-style-type: none"> <li>1. <u>Fulfils the intent of the Residential Design Guide; Achieves the following urban design outcomes:</u> <ol style="list-style-type: none"> <li>a. <u>Provides an effective public private interface;</u></li> <li>b. <u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood;</u></li> <li>c. <u>Provides high quality buildings.</u></li> <li>d. <u>Responds to the natural environment.</u></li> </ol> </li> <li>2. Includes outdoor space that is sufficient to cater for the needs of the residents of the village;</li> <li>3. Provides an adequate and appropriately located area on site for the management, storage and</li> </ol>

				<p>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> <p>Kāinga Ora seek the opportunity to review these guidelines if they are to remain a statutory document.</p>	<p>collection of all waste, recycling and organic waste potentially generated by the development;</p> <ol style="list-style-type: none"> <li>4. Is <u>adequately able to be</u> serviced by three waters infrastructure or can address any constraints on the site; and</li> <li>5. Is of an intensity, scale and design that is consistent with the <u>amenity values</u> anticipated <u>and planned built form</u> for the Zone.</li> </ol> <p><u>Note: Best practice urban design guidance is contained within Council's Design Guidelines.</u></p>
192.	Medium Density Residential Zone	MRZ-P8	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
193.	Medium Density Residential Zone	MRZ-P9	Support in part	Kāinga Ora generally supports the policy but seeks an amendment to relate to sufficient permeable surface provision rather than a minimum. There may be instances where stormwater runoff effects can be mitigated by a lower level of permeable surface area and the policy should recognise this.	<p><i>Amend MRZ-P9 as follows:</i></p> <p>Require development to provide a <u>minimum level of sufficient</u> permeable surface <u>area</u> to assist with reducing the rate and amount of storm water run-off.</p>

194.	Medium Density Residential Zone	MRZ-P10	Oppose	Kāinga Ora is opposed to any provision which may have the effect of applying blanket protections to non-indigenous vegetation and therefore seeks the deletion of this policy.	<i>Delete MRZ-P10.</i>
195.	Medium Density Residential Zone	MRZ-P12	Support in part	Kāinga Ora generally supports the policy as proposed but seeks deletion of the reference to ‘multi-unit housing’ consistent with the rest of the submission.	<i>Amend MRZ-P12 as follows:</i>  Only allow <b>multi-unit housing more than three residential units per site</b> where it can be demonstrated that the local roading network has the capacity to accommodate any increase in traffic associated with the new development, and that the safety and efficiency of the roading network will be maintained.
196.	Medium Density Residential Zone	MRZ-P13	Support in part	Kāinga Ora generally supports this policy, but seeks deletion of Design Guides within the District Plan. Kāinga Ora considers Design Guides to be too broad to be used as an assessment matter. A limited range of design criteria should be utilised instead and the focus for assessment should be effects beyond those anticipated by the zone in accordance with Policy 6 of the NPSUD.	<i>Amend MRZ-P13 by deleting reference to the Residential Design Guide and Papakāinga Design Guide and replace with the key design principles from these guides.</i>
197.	Medium Density Residential Zone	MRZ-P14	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>

198.	Medium Density Residential Zone	MRZ-P15	Support in part	<p>Kāinga Ora support this policy in general but seeks amendments for the wording of the policy to clarify that servicing may change as a result of development. Changes are also sought to better recognise the intent of the NPS-UD (particularly Policy 6) that recognises the planned urban built form and that change to existing amenity is not in itself an adverse effect.</p> <p>Amendments sought.</p>	<p><i>Amend MRZ-P15 as follows:</i></p> <p>Only allow non-residential activities and buildings that:</p> <ol style="list-style-type: none"> <li>1. Support the needs of local communities;</li> <li>2. Are of an intensity, scale and design that is consistent with the <b>amenity values</b> anticipated <b>and planned built form</b> for the Zone;</li> <li>3. Contribute positively to the urban environment and achieve attractive and safe streets;</li> <li>4. Reduce reliance on travel by private motor vehicle;</li> <li>5. Maintain the safety and efficiency of the transport network; and</li> <li>6. Are <b>adequately able to be</b> serviced by three waters infrastructure or can address any constraints on the site.</li> </ol>
199.	Medium Density Residential Zone	MRZ-PRECO1-P1	Oppose	<p>Consistent with the rest of the submission, Kāinga Ora seeks the deletion of Character Precincts and associated provisions from zone chapters and as a qualifying matter.</p>	<p><i>Delete MRZ-PRECO1-P1 to MRZ-PRECO1-P5</i></p>
200.	Medium Density Residential Zone	MRZ-PRECO1-P2			
201.	Medium Density Residential Zone	MRZ-PRECO1-P3			

202.	Medium Density Residential Zone	MRZ- PRECO1-P4			
203.	Medium Density Residential Zone	MRZ- PRECO1-P5			
204.	Medium Density Residential Zone	MRZ- PRECO2-P1	Oppose	Consistent with the rest of the submission, Kāinga Ora seeks the deletion of Character Precincts and associated provisions from zone chapters and as a qualifying matter.	<i>Delete MRZ-PRECO2-P1</i>
205.	Medium Density Residential Zone	MRZ- PRECO3-P1	Oppose	Consistent with the rest of the submission, Kāinga Ora seeks the deletion of Character Precincts and associated provisions from zone chapters and as a qualifying matter.	<i>Delete MRZ-PRECO3-P1</i>
206.	Medium Density Residential Zone	MRZ-R2 Residential activities, ex retirement villages, supported residential care activities & boarding houses	Support in part	Kāinga Ora supports this rule in part but considers changes can be made to provide for better clarity in regard to the intention of the rule and notification preclusions.	<p><i>Amend MRZ-R2 as follows:</i></p> <ol style="list-style-type: none"> <li>1. Activity status: Permitted Where: <ol style="list-style-type: none"> <li>a. No more than three residential units occupy the site; <u>and, except in MRZ-PRECO3 where there is no limit;</u></li> <li>b. <u>Compliance with the following standards is achieved:</u> <ol style="list-style-type: none"> <li>i. <u>MRZ-S1;</u></li> <li>ii. <u>MRZ-S3;</u></li> <li>iii. <u>MRZ-S4 only in relation to the rear/side yard boundary setback;</u></li> </ol> </li> </ol> </li> </ol>

					<p>iv. <u>MRZ-S5</u>; v. <u>MRZ-S7</u>.</p> <p>2. <u>Activity Status: Restricted Discretionary</u></p> <p><u>Where compliance with MRZ-R1.a. cannot be achieved.</u></p> <p><u>Matters of discretion are:</u></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> <li>2. <u>The development contributes to a safe and attractive public realm and streetscape;</u></li> <li>3. <u>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.</u></li> <li>4. <u>The degree to which development delivers quality on-site amenity and occupant privacy that is appropriate for its scale; and</u></li> </ol> <p><u>Where compliance with MRZ-R1.b. cannot be achieved.</u></p> <ol style="list-style-type: none"> <li>5. <u>The extent and effect of non-compliance with any relevant standard as specified in the associated assessment criteria for the infringed standard.</u></li> </ol> <p><u>Notification status:</u></p>
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					<ol style="list-style-type: none"> <li>1. <u>An application for resource consent which complies with MRZ-R1.a. but does not comply with MRZ-R1.b. is precluded from being publicly notified.</u></li> <li>2. <u>An application for resource consent made which does not comply with MRZ-R1.a. but complies with MRZ-R1.b. 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 MRZ-R1.a. and MRZ-R1.b. but complies with MRZ-S1 and MRZ-S5 is precluded from being either publicly notified.</u></li> </ol>
207.	Medium Density Residential Zone	MRZ-R3 Home business	Support in part	Kāinga Ora generally supports this rule and particularly supports the preclusion of public notification, but seeks amendments to recognise changing urban environments and amenity in accordance with the NPS-UD.	<p><i>Amend MRZ-R3 as follows:</i></p> <p>Matters of Discretion are:</p> <ol style="list-style-type: none"> <li>1. The extent to which the intensity and scale of the activity adversely impacts on the <u>planned urban built form amenity values</u> of nearby residential properties and the surrounding neighbourhood.</li> </ol>
208.	Medium Density Residential Zone	MRZ-R4 Supported residential care activities	Support in part	Kāinga Ora generally supports this rule but seeks amendments to recognise changing urban environments and amenity in accordance with the NPS-UD, and to preclude both public and limited notification as the activity is residential in nature and anticipated within the zone.	<p><i>Amend MRZ-R4 as follows:</i></p> <p>Matters of discretion are restricted to</p> <ol style="list-style-type: none"> <li>1. The extent to which the intensity and scale of the activity may adversely impact on the <u>planned urban built form amenity values</u> of nearby residential properties and the surrounding neighbourhood.</li> </ol>



					<p><b>Notification status:</b></p> <p>An application for resource consent made in respect of rule MRZ-R3.2 is precluded from being <u>either</u> publicly <u>or limited</u> notified.</p>
209.	Medium Density Residential Zone	MRZ-R5 Boarding houses	Support in part	<p>Kāinga Ora generally supports this rule but seeks amendments to recognise changing urban environments and amenity in accordance with the NPS-UD, and to preclude both public and limited notification as the activity is residential in nature and anticipated within the zone.</p>	<p><i>Amend MRZ-R5 as follows:</i></p> <p>Matters of discretion are restricted to</p> <ol style="list-style-type: none"> <li>1. The extent to which the intensity and scale of the activity may adversely impact on the <u>planned urban built form amenity values</u> of nearby residential properties and the surrounding neighbourhood.</li> </ol> <p><b>Notification status:</b></p> <p>An application for resource consent made in respect of rule MRZ-R4.2 is precluded from being <u>either</u> publicly <u>or limited</u> notified.</p>
210.	Medium Density Residential Zone	MRZ-R6 Visitor Accommodation	Support in part	<p>Kāinga Ora generally supports this rule but seeks amendments to recognise changing urban environments and amenity in accordance with the NPS-UD.</p>	<p><i>Amend MRZ-R6 as follows:</i></p> <p>Matters of discretion are restricted to</p> <p>The extent to which the intensity and scale of the activity may adversely impact on the <u>planned urban built form amenity values</u> of nearby residential properties and the surrounding neighbourhood.</p>
211.	Medium Density Residential Zone	MRZ-R7 Childcare services	Support in part	<p>Kāinga Ora generally supports this rule but seeks amendments to recognise changing urban environments and amenity in accordance with the NPS-UD.</p>	<p><i>Amend MRZ-R&amp; as follows:</i></p> <p>Matters of discretion are restricted to</p> <p>The extent to which the intensity and scale of the activity may adversely impact on the <u>planned urban built form</u></p>

					amenity values of nearby residential properties and the surrounding neighbourhood.
212.	Medium Density Residential Zone	MRZ-R8 Retirement village	Support	Kāinga Ora generally supports this rule and particularly supports the preclusion of public notification.	<i>Retain as notified.</i>
213.	Medium Density Residential Zone	MRZ-R9 Community, health care, emergency & education facilities	Support	Kāinga Ora generally supports this rule and particularly supports the preclusion of public notification.	<i>Retain as notified.</i>
214.	Medium Density Residential Zone	<u>NEW RULE</u>	Support	Kāinga Ora seeks a new rule to make heavy industry a Non-Complying activity which is consistent with other zone provisions and appropriate given the level of adverse effects which could be generated by heavy industrial activities. Consequential amendments to rule numbering will be required.	<p><i>Add new rule as follows:</i></p> <p><b><u>Industrial Activities</u></b></p> <p>1. <u>Activity status: Discretionary</u></p> <p><u>Where:</u></p> <p>a. <u>The activity is not a heavy industrial activity.</u></p> <p>2. <u>Activity Status: Non-complying</u></p> <p><u>Where:</u></p> <p>a. <u>Compliance with the requirements of MRZ-RX.1 cannot be achieved</u></p>

					<u>Notification status: An application for resource consent made in respect of rule MRZ-RX.2.a must be publicly notified.</u>
215.	Medium Density Residential Zone	MRZ-R11	Support	Kāinga Ora supports this rule.	<i>Retain as notified.</i>
216.	Medium Density Residential Zone	MRZ-R12	Support	Kāinga Ora supports this rule.	<i>Retain as notified.</i>
217.	Medium Density Residential Zone	MRZ-R13	Support in part	<p>Kāinga Ora generally supports this rule although an amendment is sought to the rule title to allow the rule to apply to all buildings not just those associated with no more than three residential units on a site.</p> <p>A further amendment is sought to delete reference to MRZ-P10 which is opposed.</p>	<p><i>Amend MRZ-R13 as follows:</i></p> <p><b>Construction, addition or alteration of buildings and structures <del>where no more than three residential units occupy the site.</del></b></p> <p>1. Activity Status: <b>Permitted</b></p> <p>Where:</p> <p>a. <u>There are no more than three residential units on a site; and</u></p> <p>b. Compliance with the following standards is achieved:</p> <p>I. MRZ-S1;</p> <p>II. MRZ-S3;</p>

					<p>III. MRZ-S4 only in relation to the rear yard boundary setback;</p> <p>IV. MRZ-S5;</p> <p>V. MRZ-S6;</p> <p>VI. MRZ-S7;</p> <p>VII. MRZ-S8;</p> <p>VIII. MRZ-S9; and</p> <p>IX. MRZ-S10.</p> <p>2. Activity status <b>Restricted Discretionary</b></p> <p>Where:</p> <p>a. Compliance with any of the requirements of MRZ-R13.1.a and MRZ-R13.1.b <del>cannot be</del> <u>are not</u> achieved.</p> <p>Matters of Discretion are:</p> <p>2. The matters in MRZ-P2, MRZ-P3, MRZ-P4, MRZ-P5, MRZ-P8, MRZ-P9, <del>MRZ-P10</del> and MRZ-P11; <u>and</u></p> <p>3. <u>Where compliance with MRZ-R13.1.a is not achieved, the matters in MRZ-P6.</u></p> <p>Notification status:</p> <p>An application for resource consent made in respect of rule MRZ-R13.2.a which results from non-compliance with MRZ-</p>
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					<p>S1, MRZ-S3, MRZ-S4 or MRZ-S5 is precluded from being publicly notified.</p> <p>An application for resource consent made in respect of rule MRZ-R13.2.a which results from non-compliance with MRZ-S6, MRZ-S7, MRZ-S8, MRZ-S9 or MRZ-S10 is precluded from being either publicly or limited notified.</p>
218.	Medium Density Residential Zone	MRZ-R14	Support in part	<p>Kāinga Ora supports this rule in part, particularly the preclusion of public notification.</p> <p>Kāinga Ora seek amendments to preclude limited notification for developments that comply with the relevant standards.</p> <p>Kāinga Ora opposes the including of multi-unit housing as this can be managed through MRZ-R13 in accordance with the amendments sought to that rule.</p>	<p><i>Amend MRZ-R14 as follows:</i></p> <p><b>MRZ-R14 Construction of buildings for multi-unit housing or a retirement village</b></p> <p>1. Activity status: <b>Restricted Discretionary</b></p> <p>Matters of discretion are restricted to:</p> <p>1. The extent and effect of non-compliance with any of the follow standards as specified in the associated assessment criteria for any infringed standard:</p> <ul style="list-style-type: none"> <li>i. MRZ-S2;</li> <li>ii. MRZ-S3;</li> <li>iii. MRZ-S4;</li> <li>iv. MRZ-S5;</li> <li>v. MRZ-S12 <i>for multi-unit housing only;</i></li> <li>vi. <del>MRZ-S13 for multi-unit housing only;</del></li> <li>vii. <del>MRZ-S14 for multi-unit housing only;</del></li> </ul> <p>2. The matters in MRZ-P2, MRZ-P3, MRZ-P5, <del>MRZ-P6,</del> MRZ-P7, MRZ-P8, <del>MRZ-P10</del> and MRZ-P11</p> <p><b>Notification status:</b></p>

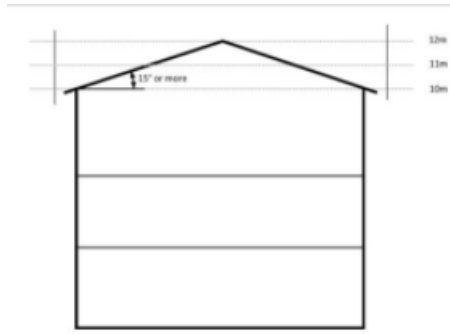
					<p>An application for resource consent made in respect of rule MRZ-R14 is precluded from being publicly notified.</p> <p><u>An application for resource consent made in respect of rule MRZ-R14 that complies with the relevant standards is precluded from public and limited notification.</u></p>
219.	Medium Density Residential Zone	MRZ-R16	Support	Kāinga Ora supports this rule.	<i>Retain as notified.</i>
220.	Medium Density Residential Zone	MRZ-R17	Support in part	<p>Kāinga Ora supports this rule in part, particularly the preclusion of public notification.</p> <p>Kāinga Ora seeks amendment to remove reference to policies which are opposed and reference to multi-unit housing.</p>	<p><i>Amend MRZ-R17 as follows:</i></p> <p>1. Activity status: <b>Permitted</b></p> <p>Where:</p> <p>Compliance with the following standards is achieved:</p> <ul style="list-style-type: none"> <li>i. MRZ-S2;</li> <li>ii. MRZ-S3;</li> <li>iii. MRZ-S4;</li> <li>iv. MRZ-S5;</li> <li>v. MRZ-S6; <u>and</u></li> <li>vi. MRZ-S12.;</li> <li><del>vii. MRZ-S13; and</del></li> <li><del>viii. MRZ-S14.</del></li> </ul> <p>2. Activity Status: <b>Restricted Discretionary</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Compliance is not achieved with any of the requirements of MRZ-R17.1.a <del>cannot be achieved.</del></li> </ul>

					<p>Matters of Discretion are:</p> <ol style="list-style-type: none"> <li>1. The extent and effect on non-compliance with any relevant standard as specified in the associated assessment criteria for the infringed standard;</li> <li>2. The matters in MRZ-P9, <del>MRZ-P10</del>; MRZ-P11 and MRZ-P15; and</li> </ol> <p>The matters in <del>MRZ-P6</del>, MRZ-P7 and <del>HM</del>MRZ-P8 for additions and alterations to <del>multi-unit housing or</del> a retirement village.</p>
221.	Medium Density Residential Zone	MRZ-PREC01-R1	Oppose	Consistent with the rest of the submission, Kāinga Ora seeks the deletion of Character Precincts and associated provisions from zone chapters and as a qualifying matter.	<i>Delete all MRZ-PREC01-R1 to MRZ-PREC01-R7</i>
222.	Medium Density Residential Zone	MRZ-PREC01-R2			
223.	Medium Density Residential Zone	MRZ-PREC01-R3			
224.	Medium Density Residential Zone	MRZ-PREC01-R4			
225.	Medium Density Residential Zone	MRZ-PREC01-R5			
226.	Medium Density Residential Zone	MRZ-PREC01-R6			
227.	Medium Density Residential Zone	MRZ-PREC01-R7			

228.	Medium Density Residential Zone	MRZ-PREC02-R1	Oppose	Consistent with the rest of the submission, Kāinga Ora seeks the deletion of Character Precincts and associated provisions from zone chapters and as a qualifying matter.	<i>Delete all MRZ-PREC02-R1 to MRZ-PREC02-R5</i>
229.	Medium Density Residential Zone	MRZ-PREC02-R2			
230.	Medium Density Residential Zone	MRZ-PREC02-R3			
231.	Medium Density Residential Zone	MRZ-PREC02-R4			
232.	Medium Density Residential Zone	MRZ-PREC02-R5			
233.	Medium Density Residential Zone	MRZ-PREC03-R1	Oppose	Consistent with the rest of the submission, Kāinga Ora seeks the deletion of Character Precincts and associated provisions from zone chapters and as a qualifying matter.	<i>Delete all MRZ-PREC03-R1 to MRZ-PREC03-R6</i>
234.	Medium Density Residential Zone	MRZ-PREC03-R2			
235.	Medium Density Residential Zone	MRZ-PREC03-R3			
236.	Medium Density Residential Zone	MRZ-PREC03-R4			
237.	Medium Density Residential Zone	MRZ-PREC03-R5			

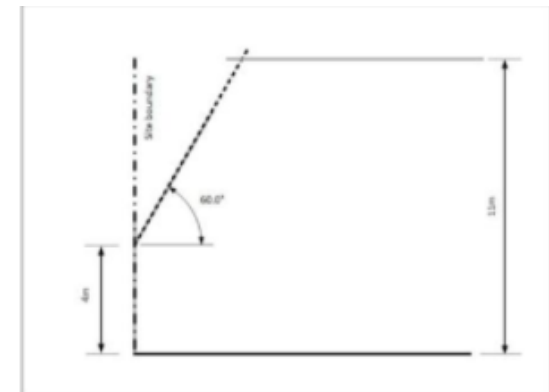


238.	Medium Density Residential Zone	MRZ-PREC03-R6			
239.	Medium Density Residential Zone	MRZ-S1	Support in part	<p>Kāinga Ora generally support this standard and acknowledges the standard is taken from the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. However, amendments are sought to allow this standard to apply to all residential units regardless of how many are on a site and to be more enabling for residential units located within close proximity to train stations and local centres.</p> <p>Consistent with the rest of the submission, Kāinga Ora seeks the deletion of Character Precincts and associated provisions from zone chapters and as a qualifying matter.</p>	<p><i>Amend MRZ-S1 as follows:</i></p> <p>Building height control <del>1:</del></p> <p><del>1. Where no more than three residential units occupy the site; or</del></p> <p><del>2. For the construction, addition or alteration of any buildings or structures in a Character Precinct or Mount Victoria North Townscape Precinct.</del></p> <p>1. Buildings and structures must not exceed 11 metres in height above ground level, except that 50% of a building's roof in elevation, measured vertically from the junction between wall and roof, may exceed the heights above by 1 metre, where the entire roof slopes 15° or more, as shown in Diagram 1 below:</p> <p><u>Except where:</u></p> <p>2. <u>In areas identified as having a height control of 18m in the planning maps, the height must not exceed 18 metres above ground level except that 50% of a building's roof in elevation, measured vertically from the junction between wall and roof, may exceed the heights</u></p>

					<p><u>above by 1 metre, where the entire roof slopes 15° or more, as shown in Diagram 1 below:</u></p> 
240.	Medium Density Residential Zone	MRZ-S2	Oppose	<p>Kāinga Ora opposes the provision of two separate height standards and seeks an amendment to MRZ-S1 to allow that standard to cover all areas and provide for greater height limits in areas with high accessibility to public transport, commercial amenity and community services.</p>	<p><i>Delete MRZ-S2</i></p>
241.	Medium Density Residential Zone	MRZ-S3	Support in part	<p>Kāinga Ora generally supports this standard but seeks an amendment to recognise the amended height limits sought through the amendment to MRZ-S1 and ensure development is suitably enabled. An amendment is also sought to</p>	<p><i>Amend MRZ-S3 as follows:</i></p> <p>Height in relation to boundary</p> <ol style="list-style-type: none"> <li>1. For any site where MRSZ-S1 <del>or MRZ-S2.1.a</del> applies: no part of any building or structure may project beyond a 60° recession plane measured from a point 4 metres</li> </ol>

remove reference to MRZ-S2 which is opposed.

vertically above ground level along all boundaries, as shown in diagram 2 below:



2. For any site where ~~MRZ-S2.1-b~~ MRZ-S1.2 applies: no part of any building or structure may project beyond a 60° recession plane measured from a point 5.6 metres vertically above ground level along all boundaries; and

242.	Medium Density Residential Zone	MRZ-S4(rear)	Support	Kāinga Ora supports this standard.	<i>Retain as notified.</i>
243.	Medium Density Residential Zone	MRZ-S5	Support	Kāinga Ora supports this standard.	<i>Retain as notified.</i>
244.	Medium Density Residential Zone	MRZ-S6	Support in part	<p>Kāinga Ora acknowledges that this standard is directly taken from the MDRS, however seek that the standard is more enabling. MRZ-S13 for multi-unit housing is a more enabling outdoor living space requirement which is considered appropriate for all residential units as it provides sufficient onsite space and amenity.</p> <p>Amendments are sought to replace MRZ-S6 with MRZ-S13 and delete reference to multi-unit housing and retirement villages.</p>	<i>Delete the entire standard, including the exclusion for multi-unit housing and retirement villages and replace with MRZ-S13 which should then be deleted.</i>
245.		MRZ-S7	Support in part	<p>Kāinga Ora acknowledges that this standard is directly taken from the MDRS, however, the standard could be made more enabling. MRZ-S14 for multi-unit housing is a more enabling provision which provides sufficient outlook space and is considered to be appropriate for all residential units regardless of the number on a site.</p>	<i>Delete the entire standard, including the exclusion for multi-unit housing and retirement villages and replace with MRZ-S14 which should then be deleted.</i>

				Amendments are sought to replace MRZ-S7 with MRZ-S14 and delete reference to multi-unit housing and retirement villages.									
246.	Medium Density Residential Zone	MRZ-S8	Support	Kāinga Ora supports this standard.	<i>Retain as notified.</i>								
247.	Medium Density Residential Zone	MRZ-S9	Support	Kāinga Ora supports this standard.	<i>Retain as notified.</i>								
248.	Medium Density Residential Zone	MRZ-S10 Permeable surface	Support in part	Kāinga Ora supports this standard. However, seek that reference to multi-unit housing is deleted as this concept is not supported.	<i>Amend MRZ-S10 as follows:</i>  This standard does not apply to: <del>a. Multi-unit housing; and</del> <del>a. Retirement villages</del>								
249.	Medium Density Residential Zone	MRZ-S12 Minimum residential unit size for multi-unit housing	Support in part	Kāinga Ora supports this standard in part, but seeks smaller floor areas for studio units and for simplicity, a minimum floor area for 1 or bedrooms.	<i>Amend MRZ-S12 as follows:</i>  <i>Residential units, including any dual key unit, must meet the following minimum sizes:</i> <table border="1" data-bbox="1413 1018 2132 1203"> <thead> <tr> <th><i>Residential Unit Type</i></th> <th><i>Minimum Net Floor Area</i></th> </tr> </thead> <tbody> <tr> <td><del>a. Studio Unit</del></td> <td><del>35m<sup>2</sup></del> <u>30m<sup>2</sup></u></td> </tr> <tr> <td><del>b. 1 or more bedroom(s) unit</del></td> <td>40m<sup>2</sup></td> </tr> <tr> <td><del>c. 2+ bedroom unit</del></td> <td><del>55m<sup>2</sup></del></td> </tr> </tbody> </table>	<i>Residential Unit Type</i>	<i>Minimum Net Floor Area</i>	<del>a. Studio Unit</del>	<del>35m<sup>2</sup></del> <u>30m<sup>2</sup></u>	<del>b. 1 or more bedroom(s) unit</del>	40m <sup>2</sup>	<del>c. 2+ bedroom unit</del>	<del>55m<sup>2</sup></del>
<i>Residential Unit Type</i>	<i>Minimum Net Floor Area</i>												
<del>a. Studio Unit</del>	<del>35m<sup>2</sup></del> <u>30m<sup>2</sup></u>												
<del>b. 1 or more bedroom(s) unit</del>	40m <sup>2</sup>												
<del>c. 2+ bedroom unit</del>	<del>55m<sup>2</sup></del>												
250.		MRZ-S13 Outdoor living space for multi-unit housing	Oppose	Kāinga Ora seeks that this standard replace MRZ-S6 as the level of outdoor living area proposed by this standard is appropriate for all sites	<i>Replace MRZ-S6 with MRZ-S13 and delete MRZ-S13</i>								

				not just sites developed with more than 3 residential units.	
251.		MRZ-S14 Outlook space for multi-unit housing	Oppose	Kāinga Ora seeks that this standard replace MRZ-S6 as the level of outlook space proposed by this standard is appropriate for all sites not just sites developed with more than 3 residential units.	<i>Replace MRZ-S7 with MRZ-S14 and delete MRZ-S14</i>
252.	Medium Density Residential Zone	MRZ-PREC01- S1 Fences & standalone walls	Oppose	As noted above, Kāinga Ora does not support the Character Precincts and seeks that these standards are deleted.	<i>Delete MRZ-PREC01-S1 &amp; MRZ-PREC01-S2</i>
253.	Medium Density Residential Zone	MRZ-PREC01- S2 Maximum height of an accessory building			
254.	Medium Density Residential Zone	MRZ-PREC03- S1	Oppose	As noted above Kāinga Ora does not support the Oriental Bay Precinct and seeks that these standards are deleted.	<i>Delete MRZ-PREC03-S1 - MRZ-PREC03-S6</i>
255.	Medium Density Residential Zone	MRZ-PREC03- S2			
256.	Medium Density Residential Zone	MRZ-PREC03- S3			

257.	Medium Density Residential Zone	MRZ-PREC03-S4			
258.	Medium Density Residential Zone	MRZ-PREC03-S5			
259.	Medium Density Residential Zone	MRZ-PREC03-S6			

**PART 3 – ZONES – RESIDENTIAL– HIGH DENSITY RESIDENTIAL ZONE**

260.	High Density Residential Zone	Introduction and Mapping	Support in Part	<p>Kāinga Ora generally supports the introduction of the High Density Residential Zone in the Proposed District Plan, but seeks amendments consistent with the spatial extent and heights sought by Kāinga Ora in this submission.</p> <p>Kāinga Ora seeks additional spatial application of the HRZs across the urban environment, including at least:</p> <ul style="list-style-type: none"> <li>• 15-20min/1500m from the edge of the City Centre Zone (CCZ)</li> <li>• 10min/800m from the edge of Metro Centre Zone (MCZ) and from existing and planned rapid transit stops</li> </ul>	<p>1. Kāinga Ora seeks the spatial application of the HRZ across the urban environment, including at least:</p> <ul style="list-style-type: none"> <li>• 15-20min/1500m from the edge of the City Centre Zone (CCZ)</li> <li>• 10min/800m from the edge of Metro Centre Zone (MCZ) and from existing and planned rapid transit stops (including the Johnsonville Line)</li> <li>• 10 min/800m from Town Centre Zones (TCZ)</li> </ul> <p>2. Kāinga Ora seeks that additional height and density is provided for within a walkable catchment of centres to enable more intensification in areas of high accessibility to key centres, including:</p> <ul style="list-style-type: none"> <li>- At least 12 storeys within a 400m walkable catchment of the CCZ and at least 8 storeys within a 800m walkable catchment</li> <li>- At least 10 storeys within a 400m walkable catchment of the MCZ</li> </ul>
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				<p>(including the Johnsonville Line)</p> <ul style="list-style-type: none"> <li>• 10 min/800m from Town Centre Zones (TCZ)</li> </ul> <p>Kāinga Ora further seeks that additional height and density is provided for within a walkable catchment of centres to enable more intensification in areas of high accessibility to key centres, including:</p> <ul style="list-style-type: none"> <li>- At least 12 storeys within a 400m walkable catchment of the CCZ and at least 8 storeys within a 800m walkable catchment</li> <li>- At least 10 storeys within a 400m walkable catchment of the MCZ</li> <li>- At least 8 storeys within a 400m walkable catchment of TCZ.</li> </ul> <p>See Appendix 4 for proposed spatial application.</p>	<ul style="list-style-type: none"> <li>- At least 8 storeys within a 400m walkable catchment of TCZ.</li> </ul> <p>3. Accept all changes proposed to the planning maps in Appendix 4.</p> <p>4. Amend Introduction as follows:</p> <p>The High Density Residential Zone encompasses areas of the city located near to the <u>City Centre Zone, Johnsonville Metropolitan Centre Zones, Town Centre Zones</u>, and <del>Kenepeuru and Tawa</del> railway stations. These areas are used predominantly for residential activities with a high concentration and bulk of buildings and other compatible activities.</p> <p>....</p> <p>The High Density Residential Zone provides for a range of housing types at a greater density and scale than the <u>Medium Density Residential Zone</u>. It gives effect to the requirements of the RMA <u>to provide for well functioning urban environments</u> by allowing for <del>three intensive development residential units of</del> up to <u>6 storeys in all areas of the HRZ and up to 12 storeys in areas of high accessibility to key centres</u>. <del>three storeys on a site, and also by enabling multi-unit housing of up to six through a resource consent process subject to standards and design guidance.</del></p>
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261.	High Density Residential Zone	HRZ-O1	Support in part	<p>Kāinga Ora generally supports the objective but seeks amendments to better reflect the density necessary to achieve a well-functioning urban environment anticipated by the NPS-UD and RMA. While this objective comes largely from the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (see objective 2), these objectives are mandatory for Medium Density Residential Areas. Therefore, this objective should be adapted to reflect the higher density of the HRZ and to better achieve objective 1 of the RMAA 2021.</p>	<p>1. <i>Amend as follows:</i></p> <p><b>Purpose</b></p> <p>The High Density Residential Zone provides for predominantly residential activities and a variety of housing types and sizes that respond to:</p> <p>Housing needs and demand; and</p> <ol style="list-style-type: none"> <li>1. The neighbourhood’s planned urban built character <u>proximate to Centres and Rapid Transit Stops</u>, including <u>36-12</u> storey buildings.</li> </ol> <p>...</p> <p>2. <i>If necessary, provide and additional objective or policy to provide for these matters.</i></p>
262.	High Density Residential Zone	HRZ-O2	Support in part	<p>Kāinga Ora generally supports the objective subject to amendments to better reflect density outcomes anticipated in the HRZ as outlined above.</p>	<p><b>Efficient use of land</b></p> <p>Land within the High Density Residential Zone is used efficiently for residential development that:</p> <ol style="list-style-type: none"> <li>1. Increases housing supply and choice;</li> <li>2. <u>Is May be of</u> a greater density and scale than the <u>Medium Density Residential Zone</u>; and</li> <li>3. Contributes positively to a more intensive high-density urban living environment</li> </ol>

263.	High Density Residential Zone	HRZ-P1 Enabled Activities	Support in part	<p>Kāinga Ora generally supports the policy, however, amendments are sought to the wording to better recognise the intent of the NPS-UD (particularly Policy 6) that recognises the planned urban built form and that change to existing amenity is not in itself an adverse effect.</p> <p>Amendments sought.</p>	<p><i>Amend as follows:</i></p> <p>Enable residential activities and other activities that are compatible with the purpose of the High Density Residential Zone, while ensuring their scale and intensity is consistent with the <del>amenity values</del> anticipated <u>and planned built form of for</u> the Zone, including:</p> <ol style="list-style-type: none"> <li>1. Home Business;</li> <li>2. Boarding Houses;</li> <li>3. Visitor Accommodation;</li> <li>4. Supported Residential Care;</li> <li>5. Childcare Services; and</li> <li>6. Community Gardens.</li> </ol>
264.	High Density Residential Zone	HRZ-P2 Housing Supply and Choice	Support in part	<p>Kāinga Ora supports this policy subject to amendments to provide for a density appropriate for a High Density Zone in a Tier 1 Council area.</p>	<p><i>Amend as follows:</i></p> <p><b>Housing supply and choice</b></p> <p>Enable a variety of housing typologies with a mix of densities within the zone, including <u>6-3</u>-storey <del>attached and detached dwellings,</del> <del>low-rise</del> apartments, and residential buildings of up to <u>6-12</u> storeys in height <u>located close to higher order centres</u>.</p>
265.	High Density Residential Zone	HRZ- P3 Housing Needs	Support in part	<p>Kāinga Ora generally supports the policy but seeks an amendment to remove reference to tenure to recognise that tenures cannot and should not be managed through the District Plan.</p>	<p><i>Amend as follows:</i></p> <p><b>Housing needs</b></p> <p>Enable housing to be designed to meet the day-to-day needs of residents, and encourage a variety of housing types <u>and</u> sizes <u>and tenures</u> to cater for people of all ages, lifestyles and abilities</p>

266.	High Density Residential Zone	HRZ-P4 Medium Density Residential Standards	Support	Kāinga Ora supports this policy.	<i>Retain as notified.</i>
267.	High Density Residential Zone	HRZ-P5 Development not meeting permitted activity status	Support	Kāinga Ora supports this policy.	<i>Retain as notified.</i>
268.	High Density Residential Zone	HRZ – P6 Multi-Unit Housing	Support in part	<p>Kāinga Ora seeks deletion of ‘multi-unit housing’ as a separate activity type from stand-alone houses or any other residential typology for the purposes of the zone rules and standards. Kāinga Ora considers that residential development should be considered on the basis of its effects and merits rather than specifically on typology or the scale/collective number of dwellings.</p> <p>Amendments are sought to the policy to allow reference to more than three residential units on a site as these are managed through a resource consent process.</p> <p>Amendments sought throughout the District Plan with the deletion of any</p>	<p>Amend as follows:  <del>Multi-unit housing. Higher density residential development</del></p> <p>Provide for <u>multi-unit housing more than six residential units per site</u> where it can be demonstrated that the development:</p> <ol style="list-style-type: none"> <li>1. <u>Fulfils the intent of the Residential Design Guide; Achieves the following urban design outcomes:</u> <ol style="list-style-type: none"> <li>a. <u>Provides an effective public private interface;</u></li> <li>b. <u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood;</u></li> <li>c. <u>Provides high quality buildings;</u></li> <li>d. <u>Responds to the natural environment.</u></li> </ol> </li> </ol>

				<p>references of 'multi-unit housing' in objectives, policies, rules, and standards.</p>	<ol style="list-style-type: none"> <li>2. Provides a minimum area of private or shared outdoor living space that is sufficient to cater for the needs of future occupants;</li> <li>3. Provides an adequate and appropriately located area on site for the management, storage and collection of all waste, recycling and organic waste potentially generated by the development; and</li> <li>4. Is <u>adequately able to be</u> serviced by three waters infrastructure or can address any <u>water</u> constraints on the site.</li> </ol>
269.	High Density Residential Zone	HRZ-P7 Retirement Villages	Support in part	<p>Kāinga Ora seek amendments to this policy to remove direct reference to the design guide and instead articulate the urban design outcomes that are sought and to recognise changing amenity in accordance with the NPSUD.</p> <p>Amendments sought.</p>	<p><i>Amend HRZ-P7 as follows:</i></p> <p>Provide for retirement villages where it can be demonstrated that the development:</p> <ol style="list-style-type: none"> <li>1. <u>Fulfils the intent of the Residential Design Guide; Achieves the following urban design outcomes:</u> <ol style="list-style-type: none"> <li>a. <u>Provides an effective public private interface;</u></li> <li>b. <u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood;</u></li> <li>c. <u>Provides high quality buildings.</u></li> <li>d. <u>Responds to the natural environment.</u></li> </ol> </li> <li>2. Includes outdoor space that is sufficient to cater for the needs of the residents of the village;</li> <li>3. Provides an adequate and appropriately located area on site for the management, storage and</li> </ol>

					<p>collection of all waste, recycling and organic waste potentially generated by the development;</p> <p>4. Is <u>adequately able to be</u> serviced by three waters infrastructure or can address any constraints on the site; and</p> <p>Is of an intensity, scale and design that is consistent with the <u>amenity values</u> anticipated <u>and planned built form</u> for the Zone.</p>
270.		HRZ-P8 Residential buildings and Structures	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
271.	High Density Residential Zone	HRZ-P9 Permeable Surface	Support in part	Kāinga Ora generally supports the policy but seeks an amendment to relate to sufficient permeable surface provision rather than a minimum. There may be instances where stormwater runoff effects can be mitigated by a lower level of permeable surface area and the policy should recognise this.	<p><i>Amend HRZ-P9 as follows:</i></p> <p>Require development to provide a <u>minimum level of sufficient</u> permeable surface <u>area</u> to assist with reducing the rate and amount of storm water run-off.</p>
272.	High Density Residential Zone	HRZ-P10 Vegetation and Landscaping	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
273.	High Density Residential Zone	HRZ-P11	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>

		Attractive and safe streets and public open spaces			
274.	High Density Residential Zone	HRZ-P12 Community Gardens, urban agriculture and waste minimisation	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
275.	High Density Residential Zone	HRZ-P13 City Outcomes Contribution	Oppose	<p>Kāinga Ora opposes requiring 'City Outcomes Contribution' for development for the following reasons:</p> <ul style="list-style-type: none"> <li>(a) it is inconsistent with the current legislative framework;</li> <li>(b) Over height development should be assessed based on the potential or actual effects or the proposed infringement, as provided for by the rule framework; and</li> <li>(c) all of these activities are anticipated by the zone, and this policy has the potential</li> </ul>	<p><i>Amend as follows:</i></p> <p><b>City Outcomes Contribution</b></p> <p><del>Require over height, large-scale residential</del> Encourage development in the High Density Residential Zone to <u>contribute to positive outcomes</u> <del>deliver City Outcomes Contributions as detailed and scored in the Residential Design Guide,</del> including through either:</p> <ol style="list-style-type: none"> <li>1. Positively contributing to public space provision and the amenity of the site and surrounding area; and/or</li> <li>2. Incorporating a level of building performance that leads to reduced carbon emissions and increased climate change resilience; and/or</li> </ol>

				<p>to disincentivise intensified development.</p> <p>Kāinga Ora seeks amendments to the policy to instead encourage positive outcomes for development in the HRZ.</p>	<p>3. Incorporating construction materials that increase the lifespan and resilience of the development and reduce ongoing maintenance costs; and/or</p> <p><del>4. Incorporating assisted housing into the development, and where this is provided legal instruments are required to ensure that it remains assisted housing for at least 25 years; and/or</del></p> <p><del>5.</del></p> <p><u>4.</u> Enabling ease of access for people of all ages and mobility.</p>
276.	High Density Residential Zone	HRZ-P14 Non-residential activities and buildings	Support	Kāinga Ora generally supports the policy.	<i>Retain as notified.</i>
277.	High Density Residential Zone	HRZ-R2 Residential activities, excluding retirement villages, supported residential care activities and boarding houses	Support in part	Kāinga Ora supports this rule in part but considers changes can be made to provide for better clarity in regard to the intention of the rule and notification preclusions and allow for a higher permitted activity threshold to allow for up to 6 dwellings within the HDRZ.	<p><i>Amend HRZ-R2 as follows:</i></p> <p>1. Activity status: Permitted Where:</p> <p>a. No more than <del>six</del> <u>three</u> residential units occupy the site;</p> <p>b. <u>Compliance with the following standards is achieved:</u></p> <ul style="list-style-type: none"> <li>i. <u>HRZ-S1;</u></li> <li>ii. <u>HRZ-S3;</u></li> <li>iii. <u>HRZ-S4 only in relation to the rear/side yard boundary setback;</u></li> <li>iv. <u>HRZ-S5;</u></li> <li>v. <u>HRZ-S7.</u></li> </ul>

					<p>2. <u>Activity Status: Restricted Discretionary</u></p> <p><u>Where compliance with HRZ-R1.a. cannot be achieved.</u></p> <p><u>Matters of discretion are:</u></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> <li>2. <u>The development contributes to a safe and attractive public realm and streetscape;</u></li> <li>3. <u>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.</u></li> <li>4. <u>The degree to which development delivers quality on-site amenity and occupant privacy that is appropriate for its scale.</u></li> </ol> <p><u>Where compliance with HRZ-1.b. cannot be achieved.</u></p> <ol style="list-style-type: none"> <li>1. <u>The extent and effect of non-compliance with any relevant standard as specified in the associated assessment criteria for the infringed standard.</u></li> </ol> <p><u>Notification status:</u></p> <ol style="list-style-type: none"> <li>1. <u>An application for resource consent which complies with HRZ-R1.a. but does not comply with MRZ-R1.b. is precluded from being publicly notified.</u></li> </ol>
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					<p>2. <u>An application for resource consent made which does not comply with HRZ-R1.a. but complies with HRZ-R1.b. 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 HRZ-R1.a. and HRZ-R1.b. but complies with HRZ-S1 and HRZ-S5 is precluded from being either publicly notified.</u></p>
278.	High Density Residential Zone	HRZ-R3 Home Business	Support in part	<p>Kāinga Ora generally supports this rule and particularly supports the preclusion of public notification. Amendments are sought to recognise changing urban environments and amenity in accordance with the NPSUD.</p>	<p><i>Amend HRZ-R3 as follows:</i></p> <p>Matters of Discretion are:</p> <p>1. The extent to which the intensity and scale of the activity adversely impacts on the <u>planned urban built form amenity values</u> of nearby residential properties and the surrounding neighbourhood.</p>
279.	High Density Residential Zone	HRZ-R9	Support in Part	<p>Kāinga Ora generally supports this rule and particularly supports the preclusion of public notification. Amendments are sought to recognise changing urban environments and amenity in accordance with the NPSUD. Small scale commercial activities, such as cafes, convenience stores, and hairdressers, provide amenity to residents in a walkable urban setting and increase the vibrancy of an area. Operating thresholds have been</p>	<p><i>Amend HRZ-R9 as follows:</i></p> <p><b>HRZ-R9 – Community facility, health care facility, emergency facility, education facility (excluding childcare services) <u>and Commercial activities</u></b></p> <p>1. Activity status: <b>Restricted Discretionary</b></p> <p><u>Where commercial activities:</u></p> <p><u>a. Are limited to the ground floor tenancy of an apartment building;</u></p> <p><u>b. Have a gross floor area that does not exceed 200m<sup>2</sup></u></p>

				<p>incorporated to ensure such activities do not detract from the underlying residential environment.</p>	<p><u>c. Have hours of operation between:</u></p> <ul style="list-style-type: none"> <li><u>i. 7.00am and 9.00pm Monday to Friday; and</u></li> <li><u>ii. 8.00am and 7.00pm Saturday, Sunday and public holidays.</u></li> </ul> <p>Matters of discretion are:</p> <ul style="list-style-type: none"> <li>1. The matters in HRZ-P14.</li> </ul> <p>Notification status: An application for resource consent made in respect of rule HRZ-R9.1 is precluded from being publicly notified.</p>
280.	High Density Residential Zone	HRZ-R13	Support in part	<p>Kāinga Ora generally supports this rule although an amendment is sought to the rule title to allow the rule to apply to all buildings not just those associated with no more than three residential units on a site.</p> <p>The permitted standard should also be expanded to six residential units as the HDZ should provide for a greater number of dwellings than the MRZ given that a greater intensity of dwellings are anticipated in this Zone.</p> <p>A further amendment is sought to delete reference to HRZ-P10.</p>	<p><i>Amend HRZ-R13 as follows:</i></p> <p><b>Construction, addition or alteration of buildings and structures <del>where no more than three residential units occupy the site.</del></b></p> <ul style="list-style-type: none"> <li>1. Activity Status: <b>Permitted</b></li> </ul> <p>Where:</p> <ul style="list-style-type: none"> <li><u>a. There are no more than six residential units on a site; and</u></li> <li><u>b. Compliance with the following standards is achieved:</u> <ul style="list-style-type: none"> <li>I. HRZ-S1;</li> <li>II. HRZ-S3;</li> <li>III. HRZ-S4 only in relation to the rear yard boundary setback;</li> <li>IV. HRZ-S5;</li> <li>V. HRZ-S6;</li> <li>VI. HRZ-S7;</li> <li>VII. HRZ-S8;</li> </ul> </li> </ul>

					<p>VIII. HRZ-S9; and IX. HRZ-S10.</p> <p>3. Activity status <b>Restricted Discretionary</b></p> <p>Where:</p> <p>a. Compliance with any of the requirements of HRZ-R13.1.a <u>and HRZ-R13.1.b cannot be are not</u> achieved.</p> <p>Matters of Discretion are:</p> <ol style="list-style-type: none"> <li>1. The matters in HRZ-P2, HRZ-P3, HRZ-P4, HRZ-P5, HRZ-P8, HRZ-P9, <del>HRZ-P10</del> and HRZ-P11; <u>and</u></li> <li>2. <u>Where compliance with HRZ-R13.1.a is not achieved the matters in HRZ-P6.</u></li> </ol> <p>Notification status:</p> <p>An application for resource consent made in respect of rule HRZ-R13.2.a which results from non-compliance with HRZ-S1, HRZ-S3, HRZ-S4 or HRZ-S5 is precluded from being publicly notified.</p> <p>An application for resource consent made in respect of rule HRZ-R13.2.a which results from non-compliance with HRZ-S6, HRZ-S7, HRZ-S8, HRZ-S9 or HRZ-S10 is precluded from being either publicly or limited notified.</p>
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281.	High Density Residential Zone	HRZ-R14	Support in part	<p>Kāinga Ora supports this rule in part, particularly the preclusion of public notification.</p> <p>Kāinga Ora seek amendments to preclude limited notification for developments that comply with the relevant standards.</p> <p>Kāinga Ora opposes the including of multi-unit housing as this can be managed through HRZ-R13 in accordance with the amendments sought to that rule.</p>	<p><i>Amend HRZ-R14 as follows, and consequential renumbering will be required:</i></p> <p><b>HRZ-R14 Construction of buildings for <del>multi-unit housing</del> or a retirement village</b></p> <p>1. Activity status: <b>Restricted Discretionary</b></p> <p>Matters of discretion are:</p> <ol style="list-style-type: none"> <li>1. The extent and effect of non-compliance with any of the follow standards as specified in the associated assessment criteria for any infringing standard: <ol style="list-style-type: none"> <li>i. HRZ-S2;</li> <li>ii. HRZ-S3;</li> <li>iii. HRZ-S12 <del>for multi-unit housing only;</del></li> <li>iv. <del>HRZ-S13 for multi-unit housing only;</del></li> <li>v. <del>HRZ-S14 for multi-unit housing only;</del></li> <li>vi. HRZ-S15;</li> <li>vii. HRZ-S16; and</li> <li>viii. HRZ-s17</li> </ol> </li> <li>2. The matters in HRZ-P2, HRZ-P3, HRZ-P5, <del>HRZ-P6,</del> HRZ-P7, HRZ-P8, <del>HRZ-P10</del> and HRZ-P11</li> <li>3. <del>The matters in HRZ-P13 where the development comprises 25 or more residential units; or exceeds the maximum height by 25% or more.</del></li> </ol> <p><b>Notification status:</b></p>
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					<p>An application for resource consent made in respect of rule MRZ-R14.1 is precluded from being publicly notified.</p> <p><u>An application for resource consent made in respect of rule MRZ-R14 that complies with the relevant standards is precluded from public and limited notification.</u></p>
282.	High Density Residential Zone	HRZ-R16	Support	Kāinga Ora supports this rule.	<i>Retain as notified.</i>
283.	High Density Residential Zone	HRZ-R17	Support in part	<p>Kāinga Ora supports this rule in part, particularly the preclusion of public notification.</p> <p>Kāinga Ora seeks amendment to remove reference to policies which are opposed and reference to residential units, multi-unit housing and retirement villages.</p>	<p><i>Amend HRZ-R17 as follows, and consequential renumbering will be required:</i></p> <p>1. Activity status: <b>Permitted</b></p> <p>Where:</p> <p>a. Compliance with the following standards is achieved:</p> <p><del>i. HRZ-S1</del></p> <p><del>ii. HRZ-S2;</del></p> <p>iii. HRZ-S3;</p> <p>iv. HRZ-S4;</p> <p>v. HRZ-S5;</p> <p>vi. HRZ-S10;</p> <p>vii. HRZ-S12;</p> <p><del>viii. HRZ-S13;</del></p> <p><del>ix. HRZ-S14;</del></p> <p><del>x. HRZ-s15;</del></p> <p><del>xi. HRZ-S16; and</del></p> <p><del>xii. HRZ-s17.</del></p>

					<p>3. Activity Status: <b>Restricted Discretionary</b></p> <p>Where:</p> <p>a. Compliance <u>is not achieved</u> with any of the requirements of HRZ-R17.1.a <del>cannot be achieved</del>.</p> <p>Matters of Discretion are:</p> <ol style="list-style-type: none"> <li>1. The extent and effect on non-compliance with any relevant standard as specified in the associated assessment criteria for the infringed standard;</li> <li>2. The matters in HRZ-P9, <del>HRZ-P10</del>; HRZ-P11 and HRZ-P14; and</li> <li>3. The matters in <del>HRZ-P6</del>, HRZ-P7 and HRZ-P8 for additions and alterations to <del>multi-unit housing</del> <del>or</del> a retirement village.</li> </ol>
284.	High Density Residential Zone	HRZ-S1	Support in part	<p>Kāinga Ora generally support this standard and acknowledges the standard is taken from the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. However, amendments are sought to allow this standard to apply to all residential units regardless of how many are on a site and to be more enabling for residential units located within close proximity to train stations and local centres.</p>	<p><i>Amend HRZ-S1 as follows, and refer to maps on proposed changes sought by Kāinga Ora:</i></p> <p>Building height control <del>1:Where no more than three residential units occupy the site; or</del></p> <ol style="list-style-type: none"> <li>1. Buildings and structures <u>must meet the following requirements:</u> <ol style="list-style-type: none"> <li>a. <u>not exceed 22 <del>24</del> metres in height above ground level, except that:</u></li> </ol> </li> </ol>

These amendments align with the NPS-UD Policy 3 which enables building heights and density of urban form to realise as much development capacity as possible, particularly within walkable distances of existing and planned rapid transit stops and amenities such as local centres. Similarly, heights should be adjusted to 35 meters where the following criteria are broadly met to recognise the higher level of these centres in the Centres hierarchy given their broader function and characteristics.

Expand the High Density Residential Zone and heights as follows:

- 43m (12 Storeys) within 400m of edge of the CCZ and 36m (10 Storeys) within 400m to 1500m from the edge of the CCZ
- 36m (10 Storeys) within 800m of the MCZ
- 29m (8 Storeys) within 800m of the TCZ.

In accordance with Appendix 4 Attached.

- This can be extended to 43m where Buildings and Structures are located within 400m of the CCZ; and
  - This can be extended to 36m where Buildings and Structures are located between 400m-800m of the CCZ or 400m of the MCZ; and
  - This can be extended to 29m where Buildings and Structures are located within 400m from Miramar Town Centre and 50m adjoining the Tawa MUZ extension, within 400m of the Tawa Town Centre Zone and 36m within 400m of the Newtown Town Centre Zone; and
- b. In all cases 50% of a building's roof in elevation, measured vertically from the junction between wall and roof, may exceed the heights above by 1 metre, where the entire roof slopes 15° or more, as shown in Diagram 1 below:

Except where:



					<p>This standard does not apply to:</p> <ul style="list-style-type: none"> <li>a. Fences or standalone walls;</li> <li>b. <u>Solar panel and heating components attached to a building provided these do not exceed the height by more than 500mm; and</u></li> <li>c. <u>Satellite dishes, antennas, aerials, chimneys, flues, architectural or decorative features (e.g., finials, spires) provided that none of these exceed 1m in diameter and do not exceed the height by more than 1m.</u></li> </ul> <p>Assessment criteria where the standard is infringed:</p> <ul style="list-style-type: none"> <li>1. Streetscape and visual amenity effects;</li> <li>2. Dominance, privacy and shading effects on adjoining sites;</li> <li>3. Effects on the function and associated amenity values of any adjacent open space zone; and</li> <li><u>4. Wind effects</u></li> </ul>
285.	High Density Residential Zone	HRZ-S2	Oppose	Kāinga Ora does not support the provision of two entirely separate height standards seeks an amendment to HRZ-S1 to allow that standard to cover all areas and provide for greater height limits close to train stations and centres.	<i>Delete HRZ-S2</i>
286.	High Density Residential Zone	HRZ-S3	Support in Part	Kāinga Ora supports this standard in general subject to amendments being made to reflect the relevant height control as amended above	<p><i>Amend HRZ-S3 as follows:</i></p> <p><del>1. For any site where HRZ-S1 applies: no</del> <u>1. No</u> part of any building or structure may project beyond a 60°</p>



				and to achieve improved regional alignment and enable appropriate levels of intensification in the HRZ.	<p>recession plane measured from a point <u>194</u> metres vertically above ground level along all boundaries <u>within 21.5m from the frontage</u>, as shown in Diagram-6 below;</p> <p>2. <del>For any site where HRZ-S2.2 applies:</del> no part of any building or structure may project beyond a 60° recession plane measured from a point 8 metres vertically above ground level along all boundaries <u>except where (1) above is applicable, and</u> except where (3) or (4) below is applicable;</p> <p>3. <del>For any site where HRZ-S2 applies:</del> no part of any building or structure may project beyond a 60° recession plane measured from a point <u>5 6</u> metres vertically above ground level along any boundary that adjoins a site in:</p> <ul style="list-style-type: none"> <li>i. The Medium Density Residential Zone; or</li> <li>ii. The Wellington Town Belt Zone; or</li> <li>iii. Any Heritage Area; or</li> <li>iv. Any site containing a Heritage Building; or</li> </ul> <p>Any site occupied by a school;.....</p>
287.	High Density Residential Zone	HRZ-S4	Support in part	Kāinga Ora supports this standard subject to removal of reference to Multi-Unit housing.	<p><i>Amend as follows:</i></p> <p>.....</p> <p>This standard does not apply to:</p> <ul style="list-style-type: none"> <li>a. Site boundaries where there is an existing common wall between 2 buildings on adjacent sites or where a common wall is proposed;</li> <li>b. Fences or standalone walls;</li> </ul>

					<p>c. <del>Multi-unit housing where there are more than six residential units</del>; and</p> <p>Retirement villages.</p>
288.	High Density Residential Zone	HRZ-S5	Support in part	<p>Kāinga Ora supports this standard subject to removal of reference to Multi-Unit housing.</p>	<p><i>Amend as follows:</i></p> <p>.....</p> <p>This standard does not apply to:</p> <ul style="list-style-type: none"> <li>a. <del>Multi-unit housing where there are more than six residential units</del>; and</li> <li>b. Retirement villages.</li> </ul>
289.	High Density Residential Zone	HRZ-S6	Support in Part	<p>Kāinga Ora acknowledges that this standard is directly taken from the MDRS, however, the standard could be made more enabling. HRZ-S13 for multi-unit housing is a more enabling outdoor living space requirement which is considered appropriate for all residential units as it provides sufficient onsite space and amenity.</p> <p>Amendments are sought to replace HRZ-S6 with HRZ-S13 and delete reference to multi-unit housing and retirement villages.</p>	<p><i>Delete the entire standard, including the exclusion for multi-unit housing and retirement villages and replace with HRZ-S13 as amended below which should then be deleted.</i></p>

290.	High Density Residential Zone	HRZ-S7	Support in part	<p>Kāinga Ora acknowledges that this standard is directly taken from the MDRS, however, the standard could be made more enabling. HRZ-S14 for multi-unit housing is a more enabling provision which provides sufficient outlook space and is considered to be appropriate for all residential units regardless of the number on a site.</p> <p>Amendments are sought to replace MRZ-S7 with MRZ-S14 and delete reference to multi-unit housing and retirement villages.</p>	<p><i>Delete the entire standard, including the exclusion for multi-unit housing and retirement villages and replace with MRZ-S14 as amended which should then be deleted.</i></p>
291.	High Density Residential Zone	HRZ-S8	Support in part	<p>Kāinga Ora supports this standard subject to removal of reference to Multi-Unit housing.</p>	<p><i>Amend as follows:</i></p> <p>.....</p> <p>This standard does not apply to:</p> <ul style="list-style-type: none"> <li>i. <u>Multi-unit housing where there are more than six residential units</u>; and</li> </ul> <p>Retirement villages</p>
292.	High Density Residential Zone	HRZ-S9	Support in part	<p>Kāinga Ora supports this standard subject to removal of reference to Multi-Unit housing.</p>	<p><i>Amend as follows:</i></p> <p>.....</p> <p>This standard does not apply to:</p>

					<p>i. <del>Multi-unit housing where there are more than six residential units</del>; and</p> <p>Retirement villages</p>								
293.	High Density Residential Zone	HRZ-S10	Support in part	Kāinga Ora supports this standard. However, reference to multi-unit housing should be deleted as this concept is not supported.	<p>Amend MRZ-S10 as follows:</p> <p>.....</p> <p>This standard does not apply to:</p> <p><del>a. Multi-unit housing where there are more than six residential units</del>; and</p> <p>Retirement villages</p>								
294.	High Density Residential Zone	HRZ-S12 Minimum residential unit size for multi-unit housing	Support in part	Kāinga Ora supports this standard in part, but seeks smaller floor areas for studio units and for simplicity, a minimum floor area for 1 or bedrooms.	<p>Amend HRZ-S12 as follows:</p> <p>Residential units, including any dual key unit, must meet the following minimum sizes:</p> <table border="1" data-bbox="1413 863 2132 1050"> <thead> <tr> <th>Residential Unit Type</th> <th>Minimum Net Floor Area</th> </tr> </thead> <tbody> <tr> <td>a. Studio Unit</td> <td><del>35m<sup>2</sup></del> 30m<sup>2</sup></td> </tr> <tr> <td>b. 1 <del>or more</del> bedroom(s) unit</td> <td>40m<sup>2</sup></td> </tr> <tr> <td><del>c. 2+ bedroom unit</del></td> <td>55m<sup>2</sup></td> </tr> </tbody> </table>	Residential Unit Type	Minimum Net Floor Area	a. Studio Unit	<del>35m<sup>2</sup></del> 30m <sup>2</sup>	b. 1 <del>or more</del> bedroom(s) unit	40m <sup>2</sup>	<del>c. 2+ bedroom unit</del>	55m <sup>2</sup>
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295.	High Density Residential Zone	HRZ-S13	Oppose	Kāinga Ora seeks that this standard replace HRZ-S6 as the level of outdoor living area proposed by this standard is appropriate for all sites not just sites developed with more than 3 residential units.	<p>Amend title as follows and Replace HRZ-S6 with HRZ-S13 and delete HRZ-S13</p> <p><b>Outdoor living space for multi-unit housing</b></p>								
296.	High Density Residential Zone	HRZ-S14	Oppose	Kāinga Ora seeks that this standard replace HRZ-S7 as the level of outlook space proposed by this	Amend title as follows and replace HRZ-S7 with HRZ-S14 and delete HRZ-S14								

				standard is appropriate for all sites not just sites developed with more than 3 residential units.	<b>Outlook space for multi-unit housing</b>
297.	High Density Residential Zone	HRZ-S15	Support in part	Kāinga Ora supports this standard. However, reference to multi-unit housing should be deleted as this concept is not supported.	<i>Amend as follows:</i>  <b>Minimum privacy separation to a boundary for <del>multi-unit housing</del> more than six residential units or a retirement village</b>
298.	High Density Residential Zone	HRZ-S16	Oppose	Kāinga Ora opposes this standard as Building for multi-unit housing (more than six units) is a Restricted Discretionary activity so this matter can be considered as part of that consent process, so this standard is unnecessary.	<i>Delete standard</i>
299.	High Density Residential Zone	HRZ-S17	Oppose	Kāinga Ora opposes this standard as Building for multi-unit housing (more than six units) is a Restricted Discretionary activity so this matter can be considered as part of that consent process, so this standard is unnecessary.	<i>Delete standard</i>
<b>PART 3 – AREA SPECIFIC MATTERS – ZONES – COMMERCIAL AND MIXED USE – NEIGHBOURHOOD CENTRE ZONE</b>					
300.	Neighbourhood Centre Zone	Introduction	Support in part	Kāinga Ora generally supports the introduction and application of a Neighbourhood Centre Zone in the Draft District Plan.  However, amendments are sought to remove references to Design	Amend Introduction as follows:  High quality building design is a focus for the Neighbourhood Centres Zone. The transition to more intensive use in some neighbourhood centres will result in changes to existing amenity values in the centres and their surrounds. Consequently, redevelopment will be supported by a range of measures to promote good design and

				<p>Guides. Design Guides are too broad to be used as an assessment matter. A limited range of design criteria should be utilised instead and the focus for assessment should be effects beyond those anticipated by the zone.</p>	<p>environmental outcomes, and address <b>amenity</b> issues <b>that are not anticipated in the Zone</b>. Accordingly, most building activities will require a resource consent and an assessment against <del>the Centres and Mixed-use Design Guide key design criteria</del>. To enable intensification around existing neighbourhood centres, some of these will have increased building heights.</p>
301.	Neighbourhood Centre Zone	NCZ-O1	Support	Kāinga Ora generally supports the objective	<i>Retain as notified.</i>
302.	Neighbourhood Centre Zone	NCZ-O2	Support	Kāinga Ora generally supports the objective	<i>Retain as notified.</i>
303.	Neighbourhood Centre Zone	NCZ-O3	Support in part	<p>Kāinga Ora support this objective but seeks a minor amendment to recognise the range of housing densities potentially enabled in the zone.</p> <p>Amendments sought.</p>	<p><i>Amend objective as follows:</i></p> <p>Medium <b>to high</b> density mixed-use development is achieved that positively contributes to creating a high quality, well-functioning urban environment that reflects the changing urban form and amenity values of the Neighbourhood Centre Zone and their surrounding residential areas.</p>
304.	Neighbourhood Centre Zone	NCZ-O4	Support in part	Kāinga Ora generally support the objective.	<i>Retain as notified.</i>

305.	Neighbourhood Centre Zone	NCZ-P1	Support in part	<p>Kāinga Ora support this policy but seeks amendment to recognise that tenures and affordability cannot and should not be managed through the District Plan. The focus should be on providing for the level of the activity and building form that is appropriate for a Neighbourhood Centre.</p> <p>Amendments sought.</p>	<p><i>Amend as follows:</i></p> <p>Provide for the use and development of the Neighbourhood Centre Zone to meet the City’s needs for housing, business activities and community facilities, including:</p> <ol style="list-style-type: none"> <li>1. A variety of building types, sizes, <del>tenures, affordability</del> and distribution of a scale and intensity that does not undermine the viability and vibrancy of the Local and Metropolitan Centre zone and the primacy of the City Centre;</li> <li>2. A mix of medium <b>to high</b> density housing;</li> <li>3. Convenient access to active, public transport and rapid transit options;</li> <li>4. Efficient, well integrated and strategic use of available development sites; and</li> <li>5. Convenient access to a range of open spaces</li> </ol>
306.	Neighbourhood Centre Zone	NCZ-P2	Support	<p>Kāinga Ora supports this policy as it enables residential activities in the NCZ and a range of activities to support residential growth.</p>	<p><i>Retain as notified.</i></p>
307.	Neighbourhood Centre Zone	NCZ-P3	Support	<p>Kāinga Ora support this policy</p>	<p><i>Retain as notified.</i></p>
308.	Neighbourhood Centre Zone	NCZ-P4	Support	<p>Kāinga Ora support this policy</p>	<p><i>Retain as notified.</i></p>

309.	Neighbourhood Centre Zone	NCZ-P5	Support	Kāinga Ora support this policy	<i>Retain as notified.</i>
310.	Neighbourhood Centre Zone	NCZ-P6	Support in part	<p>Kāinga Ora generally support this policy but seeks amendment to:</p> <p>(a) recognise the range of housing densities potentially enabled in the zone, and to recognise that tenures and affordability cannot and should not be managed through the District Plan. The focus should be on providing for the level of the activity and building form that is appropriate for a Neighbourhood Centre. And;</p> <p>(b) Clarify that intent of the Neighbourhood Centre zone is to enable intensification and height, and therefore medium to high-density housing is the appropriate scale of development to encourage within the Neighbourhood Centre, particularly taking account of the location of some Neighbourhood Centres adjoining High Density Residential Zones. Furthermore, high-density residential</p>	<p>Amend NCZ-P6</p> <p>Enable medium <u>to high</u> density residential development that:</p> <ol style="list-style-type: none"> <li>1. Contributes towards accommodating anticipated growth in the City; and</li> </ol> <p>Offers a range of housing price, type <u>and</u> size <u>and tenure</u> that is accessible to people of all ages, lifestyles, cultures and abilities.</p>



				<p>development can provide for a range of housing choices in itself. This position is consistent with NCZ-P1 and NCZ-P7 and the intent of the NCZ.</p> <p>Amendments sought.</p>	
311.	Neighbourhood Centre Zone	NCZ-P7	Support in part	<p>Kāinga Ora generally supports this policy, but seeks amendment to:</p> <p>(a) The policy name to better reflect the intent of the policy and the subsequent wording, which seeks to manage new developments contribution to the neighbourhood and townscape; and</p> <p>(b) The policy wording to better recognise the NCZ rule setting and the intent of the NPS-UD (particularly Policy 6) that recognises the planned urban built form and that change to existing amenity is not in itself an adverse effect; and to simplify and clarify the neighbourhood and townscape outcomes that plan is seeking to manage.</p>	<p><i>Amend NCZ-P7 as follows:</i></p> <p><del>Quality design</del> <b>Neighbourhood and Townscape Outcomes</b></p> <p>Require new development, and alterations and additions to existing development at a site scale, to positively contribute to the sense of place, quality and <u>planned urban built form amenity</u> of the Neighbourhood Centre Zone by:</p> <ol style="list-style-type: none"> <li>1. Recognising the benefits of well-designed, comprehensive, development, including the extent to which the development: <ol style="list-style-type: none"> <li>a. <del>Acts as a positive catalyst for future change by reflecting</del> <u>Reflects</u> the nature and scale of the development <u>proposed-enabled</u> within the zone <del>and in the vicinity,</del> and responds to the evolving, more intensive identity of the neighbourhood;</li> <li>b. Optimises the development capacity of land; <del>particularly sites that are:</del> <ol style="list-style-type: none"> <li>i. <del>Large;</del> or</li> <li>ii. <del>Narrow;</del> or</li> <li>iii. <del>Vacant;</del> or</li> <li>iv. <del>Ground level parking areas;</del></li> </ol> </li> <li>c. Provides for the increased levels of residential</li> </ol> </li> </ol>

					<p>accommodation enabled in this zone; and</p> <p>d. Provides for a range of supporting business, open space and community facilities;</p> <p>2. Ensuring that the development, <b>where relevant:</b></p> <p>a. Responds to the site context, particularly where it is located adjacent to:</p> <p>i. A scheduled site of significance to tangata whenua or other Māori;</p> <p>ii. A heritage building, heritage structure or heritage area;</p> <p>iii. Residential zoned areas;</p> <p>iv. Open space zoned areas;</p> <p>b. Provides a safe and comfortable pedestrian environment;</p> <p>c. Enhances the quality of the streetscape and public / private interface;</p> <p>d. Integrates with existing and planned active and public transport movement networks, including planned rapid transit stops; and</p> <p>e. Allows sufficient flexibility for ground floor space to be converted for a range of activities, including residential.</p>
312.	Neighbourhood Centre Zone	NCZ-P8	Support in part	<p>Kāinga Ora supports this policy in part subject to amendments to relevant rules being made to clarify the extent of on-site amenity requirements. Amendments to remove communal outdoor space requirements are also sought as this</p>	<p><i>Amend NCZ-P8 as follows</i></p> <p><b>On-site residential amenity</b></p> <p>Achieve a good standard of amenity for residential activities in the Neighbourhood Centre Zone by:</p>

				is already covered by reference to outdoor space generally and this could be private outdoor space.	<p>1. Providing residents with access to adequate outlook; and</p> <p>Ensuring access to convenient outdoor space, <del>including private or shared communal areas.</del></p>
313.	Neighbourhood Centre Zone	NCZ-P9	Support in part	Kāinga Ora seeks amendment to the policy to specify that adverse effects that need consideration are those beyond what is anticipated in the zone, consistent with the proposed zone framework and in accordance with Policy 6 NPSUD.	<p><i>Amend NCZ-P9 as follows:</i></p> <p>Recognise the evolving, higher density development context enabled in the Neighbourhood Centres Zone, while managing any associated adverse effects <u>beyond those anticipated within the zone</u>, including:</p> <ol style="list-style-type: none"> <li>Shading, privacy, bulk and dominance effects on adjacent sites; and</li> <li>The impact of construction on the transport network</li> </ol>
314.	Neighbourhood Centre Zone	NCZ-P10	Oppose	<p>Kāinga Ora opposes requiring ‘City Outcomes Contribution’ for the following reasons:</p> <ol style="list-style-type: none"> <li>It is inconsistent with the current legislative framework;</li> <li>Over height development should be assessed based on the potential or actual effects or the proposed infringement, as provided for by the rule framework; and</li> <li>All of these activities are anticipated by the zone, and this policy has the potential to</li> </ol>	<p><i>Amend NCZ-P10 as follows:</i></p> <p><b>City Outcomes Contribution</b></p> <p><del>Require over height, large scale residential, non-residential and comprehensive</del> <u>Encourage</u> development in the Neighbourhood Centre Zone to <u>contribute to positive outcomes deliver City Outcomes Contributions as detailed and scored in the Mixed Use Design Guide guideline G107</u>, including <del>through either:</del></p> <ol style="list-style-type: none"> <li>Positively contributing to public space provision and the amenity of the site and surrounding area; and/or</li> </ol>

				<p>disincentivise intensified development.</p> <p>Kāinga Ora seeks amendments to the policy instead to encourage positive outcomes for development in the Neighbourhood Centre Zone.</p>	<ol style="list-style-type: none"> <li>2. Incorporating a level of building performance that leads to reduced carbon emissions and increased climate change resilience; and/or</li> <li>3. Incorporating construction materials that increase the lifespan and resilience of the development and reduce ongoing maintenance costs; and/or</li> <li>4. <del>Incorporating assisted housing into the development; and where this is provided legal instruments are required to ensure that it remains assisted housing for at least 25 years; and/or</del></li> <li>5. Enabling ease of access for people of all ages and mobility.</li> </ol>
315.	Neighbourhood Centre Zone	NCZ-R10	Support in part	<p>Kāinga Ora supports this rule in part as residential activities should be enabled in Neighbourhood Centres, but seeks that:</p> <p>(a) The activity status for non-compliance is amended to Restricted Discretionary with preclusion for limited notification and appropriate matters of discretion are restricted to Policy 7 and 8 matters.</p> <p>(b) Rules related to verandah coverage are removed, as it is considered that residential activities should be provided for where verandah coverage is required, particularly when ground floor development is</p>	<p><i>Amend NCZ-R10 as follows:</i></p> <ol style="list-style-type: none"> <li>1. Activity status: <b>Permitted</b></li> </ol> <p>Where:</p> <p>a. The activity is located:</p> <ol style="list-style-type: none"> <li>i. Above ground floor level;</li> <li>ii. At ground floor level along any street edge not identified as an active frontage;</li> <li>iii. At ground floor level along any street edge not identified as a non-residential activity frontage;</li> <li>iv. <del>At ground level along any street not identified as requiring verandah coverage; or</del></li> <li>v. <del>At ground level on any site contained within a Natural Hazard Overlay</del></li> </ol>

				<p>controlled on active frontages and non-residential activity frontages in accordance with NCZ-P4.</p> <p>Reference to natural hazards is removed as these matters are controlled by Natural Hazard rules and the proposed wording is inconsistent with this approach and does not manage residential activity at ground-level in hazard overlay areas.</p>	<p>2. Activity status: <b>Restricted Discretionary</b></p> <p>Where:</p> <p>a. Compliance with the requirements of NCZ-R10.1.a cannot be achieved.</p> <p><u>Matters of discretion are restricted to:</u></p> <p>1. <u>The matters in NCZ-P7-P8.</u></p> <p>Notification status: An application for resource consent made in respect of rule NCZ-R10.2.a is precluded from being <b>limited and</b> publicly notified.</p>
316.	Neighbourhood Centre Zone	NCZ-R11	Oppose	<p>Kāinga Ora opposes this rule as the provision of integrated retail up to 20,000m<sup>2</sup> is inconsistent with the centre hierarchy across the Plan and the zones are too small to accommodate an integrated retail activity of 20,000m<sup>2</sup>.</p>	<p><i>Delete NCZ-R11</i></p>
317.	Neighbourhood Centre Zone	NCZ-R12	Support	<p>Kāinga Ora generally supports the rule.</p>	<p><i>Retain as notified.</i></p>
318.	Neighbourhood Centre Zone	NCZ-R13	Support	<p>Kāinga Ora generally supports the rule.</p>	<p><i>Retain as notified.</i></p>

319.	Neighbourhood Centre Zone	NCZ-R14	Support	Kāinga Ora generally supports the rule.	<i>Retain as notified.</i>
320.	Neighbourhood Centre Zone	NCZ-R16	Support	Kāinga Ora generally supports the rule.	<i>Retain as notified.</i>
321.	Neighbourhood Centre Zone	NCZ-R17	Support in part	<p>Kāinga Ora supports this rule in part but seeks an amendment to ensure the rule only applies to active and non-residential activity frontages.</p> <p>The notification status is supported.</p>	<p><i>Amend NCZ-R17 as follows:</i></p> <p>1. Activity status: <b>Permitted</b></p> <p>Where:</p> <p>a. The demolition or removal of a building <u>on a site that has an active frontage or non-residential activity frontage</u>:</p> <ul style="list-style-type: none"> <li>i. Is required to avoid an imminent threat to life and/or property; or</li> <li>ii. Enables the creation of public space or private outdoor living space associated with the use of a building; or</li> <li>iii. Is required for the purposes of constructing a new building or structure, or adding to or altering an existing building or structure, that has an approved resource consent, or resource consent is being sought concurrently under NCZ-R18.2; or</li> </ul> <p>b. The building or structure for demolition or removal is not on a site that has an active frontage or non-residential activity frontage; or</p>

					The demolition or removal involves a structure, excluding any building.
322.	Neighbourhood Centre Zone	<u>NEW RULE</u>	Support	<p>Kāinga Ora seeks a new rule to allow for the construction of, or additions and alterations to residential buildings and structures as a permitted activity.</p> <p>NCZ-R18 does not provide for residential activities, or the standards associated.</p> <p>A consequential amendment to the rule numbering will be required to accommodate this new rule.</p>	<p>Insert new rule:</p> <p><u>NCZ-RX - The construction of, or additions and alterations to buildings and structures containing residential activities.</u></p> <p><b>1. Activity status: Permitted</b></p> <p><u>Where:</u></p> <p><b>a. The activity is located:</b></p> <ul style="list-style-type: none"> <li>i. <u>Above ground floor level;</u></li> <li>ii. <u>At ground floor level along any street edge not identified as an active frontage; or</u></li> <li>iii. <u>At ground floor level along any street edge not identified as a non-residential activity frontage; and</u></li> <li>iv. <u>Complies with NCZ-R1, NCZ-R4, NCZ-S7, LCZ-S8 and LCZ-S9.</u></li> </ul> <p><b>2. Activity status: Restricted Discretionary</b></p> <p><u>Where:</u></p> <p>b. <u>Compliance with the requirements of NCZ-R10.1.a cannot be achieved.</u></p>

					<p><u>Matters of discretion are restricted to:</u></p> <p>2. <u>The matters in NCZ-P7-P8.</u></p> <p><u>Notification status: An application for resource consent made in respect of rule NCZ-RX is precluded from being limited and publicly notified.</u></p>
323.	Neighbourhood Centre Zone	NCZ-R18	Support in part	<p>Kāinga Ora supports this rule in part, but seeks:</p> <p>(a) amendments to remove direct reference to the design guide and to instead rely on the urban design outcomes that are outlined by the policy references and amended standards, and</p> <p>(b) to remove reference to the “City Outcomes Contribution” as this will unduly limit intensive development and height infringements should be assessed on its effects as provided for under the Resource Management Act, instead reference to NCZ-P10 in the matters of discretion is sufficient.</p>	<p><i>Amend NCZ-R18 as follows, and any consequential renumbering:</i></p> <p>Activity status: <b>Permitted</b></p> <p>Where:</p> <p>a. Alterations or additions to a building or structure:</p> <ol style="list-style-type: none"> <li>i. Do not alter the external appearance of the building or structure; or</li> <li>ii. Relate to a building frontage below verandah level, including entranceways and glazing and compliance with NCZ-S5 is achieved; or</li> <li><del>iii. Do not result in the creation of new residential units; and</del></li> <li>iv. Are not visible from public spaces; and</li> <li>v. Comply with effects standards NCZ-S1, NCZ-S2, NCZ-S3, NCZ-S4, NCZ-S5 and NCZ-S6; and</li> </ol> <p>b. The construction of any building or structure:</p> <ol style="list-style-type: none"> <li>i. Is not located on a site with an active frontage or non-residential activity frontage; or</li> <li>ii. Is not visible from a public space; and</li> <li>iii. Will have a gross floor area of less than 100m<sup>2</sup>; and</li> </ol>



					<p>iv. Will result in a total coverage (together with other buildings) of no more than 20 percent of the site; and</p> <p>v. Comply with effects standards NCZ-S1, NCZ-S2, NCZ-S3, NCZ-S4, NCZ-S5 and NCZ-S6; and</p> <p>vi. Does not involve the construction of a new building for residential activities.</p> <p>vii. <u>any building for residential activities complies with effects standards NCZ-S7 and NCZ-S8</u></p> <p>2. Activity status: <b>Restricted Discretionary</b></p> <p><b>Where:</b></p> <p>a. Compliance with any of the requirements of NCZ-R18.1 cannot be achieved.</p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <li>1. The matters in NCZ-P6, NCZ-P7, NCZ-P8, NCZ-P9 and NCZ-P10;</li> <li>2. The extent and effect of non-compliance with any relevant standard as specified in the associated assessment criteria for the infringed standard.</li> <li>3. <del>The Centres and Mixed-Use Design Guide, including guideline G107 – City Outcomes Contribution for any building that exceeds the maximum height requirement and either comprises 25 or more residential units or is a non-residential building;</del></li> <li>4. <del>The Residential Design Guide;</del></li> <li>5. The extent and effect of any identifiable site constraints;</li> </ol>
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					<p>6. Construction impacts on the transport network; and</p> <p>7. The availability and connection to existing or planned three waters infrastructure.</p> <p>Notification status:</p> <p>An application for resource consent made in respect of rule NCZ-R18.2.a that complies with both NCZ-S3, NCZ-S7, <u>and</u> NCZ-S8, <del>NCZ-S9, NCZ-S10 and NCZ-S11</del> is precluded from being either publicly or limited notified.</p> <p>An application for resource consent made in respect of rule NCZ-R18.2.a that results from non-compliance with NCZ-S1, NCZ-S2, NCZ-S4, NCZ-S5 and NCZ-S6 is precluded from being publicly notified.</p>
324.	Neighbourhood Centre Zone	NCZ-R19	Support in part	<p>Kāinga Ora supports this rule in part, and particularly supports the preclusion public and limited notification.</p> <p>Kāinga Ora seek amendments to remove direct reference to the design guide as the matters in the relevant policies include those matters articulated through the design guides.</p>	<p><i>Amend NCZ-R19 as follows:</i></p> <p>1. Activity status: <b>Restricted Discretionary</b></p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <li>1. The matters in NCZ-P1, NCZ-P3, NCZ-P6, <u>NCZ-P7</u> and NCZ-P8;</li> <li>2. The extent of compliance with standards NCZ-S7, NCZ-S8 and NCZ-S9 and satisfaction of associated assessment criteria;</li> <li>3. <del>The Residential Design Guide;</del> and</li> <li>4. The availability and connection to existing or planned three waters infrastructure.</li> </ol> <p><b>Notification Status:</b></p>

					An application for resource consent made in respect of rule NCZ-R19 is precluded from being either publicly or limited notified.
325.	Neighbourhood Centre Zone	NCZ-S1	Support in part	<p>Kāinga Ora generally supports NCZ-S1 particularly as it enables six storey development in a number of centres.</p> <p>However, Kāinga Ora seeks amendment to enable fence heights of up to 2 metres to align with the Building Act.</p> <p>Amendments sought.</p>	<p><i>Amend NCZ-S1 as follows:</i></p> <p>2. Fences or standalone walls must not exceed a maximum height of <del>2.1.8</del> 2 metres (measured above ground level).</p>
326.	Neighbourhood Centre Zone	NCZ-S2	Support	Kāinga Ora generally supports the standard.	Retain as notified.
327.	Neighbourhood Centre Zone	NCZ-S3	Support	Kāinga Ora generally supports the standard.	Retain as notified.
328.	Neighbourhood Centre Zone	NCZ-S4	Support	Kāinga Ora generally supports the standard.	<i>Retain as notified</i>

329.	Neighbourhood Centre Zone	NCZ-S6	Support	Kāinga Ora generally supports the standard.	<i>Retain as notified</i>								
330.	Neighbourhood Centre Zone	NCZ-S7	Support in part	Kāinga Ora supports this standard in part but seeks amendments to remove the minimum standard for 2+ bedroom units to enable greater design flexibility.	<i>Amend NCZ-S7 as follows:</i> <table border="1" data-bbox="1415 435 2134 699"> <thead> <tr> <th>Residential Unit Type:</th> <th>Minimum Net Floor Area</th> </tr> </thead> <tbody> <tr> <td>a. Studio unit</td> <td><u>305m<sup>2</sup></u></td> </tr> <tr> <td>b. 1 <u>or more</u> bedroom unit</td> <td>40m<sup>2</sup></td> </tr> <tr> <td><del>c. 2+ bedroom unit</del></td> <td><del>55m<sup>2</sup></del></td> </tr> </tbody> </table> <p>.....</p>	Residential Unit Type:	Minimum Net Floor Area	a. Studio unit	<u>305m<sup>2</sup></u>	b. 1 <u>or more</u> bedroom unit	40m <sup>2</sup>	<del>c. 2+ bedroom unit</del>	<del>55m<sup>2</sup></del>
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<del>c. 2+ bedroom unit</del>	<del>55m<sup>2</sup></del>												
331.	Neighbourhood Centre Zone	NCZ-S8	Support.	Kāinga Ora generally supports this standard.	<i>Retain as notified</i>								
332.	Neighbourhood Centre Zone	NCZ-S9	Oppose	<p>Kāinga Ora opposes this provision as it sets a standard that may not be possible to meet for dwellings that would otherwise provide a decent standard of living and is inconsistent with the scale of high density development.</p> <p>Deletion sought.</p>	<i>Delete NCZ-S9</i>								
333.	Neighbourhood Centre Zone	NCZ-S10	Oppose	Kāinga Ora opposes this standard as it constrains design flexibility, and it is not clear what positive outcome it achieves. The zones are small and	<i>Delete NCZ-S10</i>								

				<p>generally have limited depth which will place natural constraints on development and separations.</p> <p>Furthermore, these standards are not triggered by any rule and so should be deleted.</p> <p>Deletion sought.</p>	
334.	Neighbourhood Centre Zone	NCZ-S11	Oppose	<p>Kāinga Ora opposes this standard as it constrains design flexibility, and it is not clear what positive outcome it achieves. The zones are small and have limited depth which will place natural constraints on development and separations.</p> <p>Furthermore, these standards are not triggered by any rule and so should be deleted.</p> <p>Deletion sought.</p>	<i>Delete NCZ-S11</i>
<b>PART 3 – AREA SPECIFIC MATTERS – ZONES – COMMERCIAL AND MIXED USE – LOCAL CENTRE ZONE</b>					
335.	Local Centre Zone	Introduction	Support in Part	<p>Kāinga Ora generally supports the introduction and application of a Local Centre Zone in the Draft District Plan.</p> <p>The Local Centre Zone description states “These centres serve the needs of the surrounding residential</p>	<ol style="list-style-type: none"> <li>1. Introduce a Town Centre category in the Centres hierarchy and include Miramar, Tawa, and Newtown in a new Town Centre chapter See Appendix 2 for further detail.</li> <li>2. <i>Amend Introduction as follows:</i></li> </ol>

			<p>catchment and neighbouring suburbs”. This is inconsistent with the National Planning Standards description which limits this to the “residential catchment”. The Planning Standards description of Town Centres includes the “immediate and neighbouring suburbs”. Accordingly, Kāinga Ora seeks that a Town Centre category is added to the Hierarchy of Centres to include Karori, Miramar, Tawa, and Newtown and the description of Local Centres is amended to better reflect the Planning Standards.</p> <p>It is also unclear why the High Density Residential Zone only applies to “most” centres so this should be amended to include all local centres to help support their core functions. At the moment the MDRS (11m) applies to Karori, Crofton Downs, Khandallah, Churton Park. 14m applies to Miramar, Hataitai, Island Bay, Brooklyn, and Newlands. High Density applies to Newtown, Kelburn, Linden and Tawa.</p> <p>Reference is also made to assessment against Design Guides.</p>	<p>The purpose of the Local Centre Zone is to provide for a range commercial, community, recreational and residential activities. These centres service the needs of the surrounding residential catchment <del>and neighbouring suburbs</del>. Local centres support the role and function of other Centre Zones in the hierarchy of centres.</p> <p>The Local Centre Zone is distributed across the city and will play a crucial role in accommodating and servicing the needs of the existing and forecast population growth. The <del>Medium Density and High Density Residential Zones</del> surrounds <del>most</del> local centres. These zones enable intensification due to the capacity of the area to absorb more housing with enablers of growth such as walkability, access to public transport, community facilities and services.</p> <p>High quality building design is a focus for the Local Centres Zone. The transition to more intensive use in some local centres will result in changes to existing amenity values in the centres and their surrounds. Consequently, redevelopment will be supported by a range of measures to promote good design and environmental outcomes, and address amenity issues <del>that are not anticipated in the Zone</del>. Accordingly, most building activities will require a resource consent and an assessment against <del>the Centres and Mixed Use Design Guide</del> key design criteria.</p> <p>There is an identified need for residential intensification within and around local centres. <del>These centres are subject to the intensification policies 3 (c) and (d) of the National</del></p>
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				Design Guides are too broad to be used as an assessment matter. A limited range of design criteria should be utilised instead and the focus for assessment should be effects beyond those anticipated by the zone in accordance with Policy 6 of the NPSUD.	<del>Policy Statement on Urban Development 2020 (NPS-UD).</del> Accordingly, residential activity is permitted above ground floor <u>or where not visible at ground level</u> within these centres.  ...
336.	Local Centre Zone	LCZ-O1	Support in part	Kāinga Ora generally supports the objective apart from the need to reflect the place of Local Centres under Town Centres in the Centres hierarchy by primarily serving surrounding residential areas instead of suburbs.	<i>Amend as follows:</i>  The Local Centre Zone meets the needs of communities, businesses and residents in the surrounding residential catchment <del>and neighbouring suburbs</del> in a manner that supports the City's compact urban growth objectives and its role and function in the City's hierarchy of centres.
337.	Local Centre Zone	LCZ-O2	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified.</i>
338.	Local Centre Zone	LCZ-O3	Support in part	Kāinga Ora support this objective but seeks a minor amendment to recognise the range of housing densities potentially enabled in the zone.  Amendments sought.	<i>Amend objective as follows:</i>  Medium <u>to high</u> density mixed-use development is achieved that positively contributes to creating a high quality, well-functioning urban environment that reflects the changing urban form and amenity values of the Local Centre Zone and their surrounding residential areas.
339.	Local Centre Zone	LCZ-O4	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified.</i>

340.	Local Centre Zone	LCZ-P1	Support in part	<p>Kāinga Ora generally supports this policy but seeks amendment to:</p> <p>(a) recognise the range of housing densities potentially enabled in the zone, and to recognise that tenures and affordability cannot and should not be managed through the District Plan. The focus should be on providing for the level of the activity and building form that is appropriate for a Local Centre. And;</p> <p>(b) Clarify that intent of the Local Centre Zone is to enable significant intensification and height, and therefore medium to high-density housing is the appropriate scale of development to encourage within the Local Centre.</p> <p>(c) recognise the place of Local Centres under Town Centres in the Centres hierarchy.</p> <p>Amendments sought.</p>	<p><i>Amend as follows:</i></p> <p>Provide for the use and development of the Local Centre Zone to meet the City's needs for housing, business activities and community facilities, including:</p> <ol style="list-style-type: none"> <li>1. A variety of building types, sizes, <del>tenures, affordability</del> and distribution of a scale and intensity that does not undermine the viability and vibrancy of <u>the Town Centre zone</u>, the Metropolitan Centre zone and the primacy of the City Centre;</li> <li>2. Forms of medium <u>to high</u> density housing;</li> <li>3. <del>Convenient</del> access to active, public transport and rapid transit options;</li> <li>4. Efficient, well integrated and strategic use of available development sites; and</li> <li>5. Convenient access to a range of open spaces</li> </ol>
341.	Local Centre Zone	LCZ-P2	Support	<p>Kāinga Ora supports this policy as it enables residential activities in the LCZ and a range of activities to support residential growth.</p>	<p><i>Retain as notified.</i></p>



342.	Local Centre Zone	LCZ– P3	Support	Kāinga Ora supports this policy.	<i>Retain as notified.</i>
343.	Local Centre Zone	LCZ-P4	Support	Kāinga Ora supports this policy.	<i>Retain as notified.</i>
344.	Local Centre Zone	LCZ-P5	Support	Kāinga Ora supports this policy.	<i>Retain as notified.</i>
345.	Local Centre Zone	LCZ – P6	Support in part	<p>Kāinga Ora generally supports this policy but seeks amendment to:</p> <p>(a) recognise the range of housing densities potentially enabled in the zone, and to recognise that tenures and affordability cannot and should not be managed through the District Plan. The focus should be on providing for the level of the activity and building form that is appropriate for a Local Centre. And;</p> <p>(b) Clarify that intent of the Local Centre zone is to enable significant intensification and height, and therefore medium to high-density housing is the appropriate scale of development to encourage</p>	<p><i>Amend as follows:</i></p> <p><b>Housing choice</b></p> <p>Enable medium <u>to high</u> density residential development that:</p> <ol style="list-style-type: none"> <li>1. Contributes towards accommodating anticipated growth in the City; and</li> <li>2. Offers a range of housing price, type, <u>and</u> size <del>and</del> <u>tenure</u> that is accessible to people of all ages, lifestyles, cultures and abilities</li> </ol>

				<p>within the Local Centre and high-density residential development can provide for a range of housing choices in itself. This position is consistent with LCZ-P7 and the intent of the LCZ.</p> <p>Amendments sought.</p>	
346.	Local Centre Zone	LCZ-P7	Support in part	<p>Kāinga Ora generally supports this policy, but seeks amendment to:</p> <p>(a) The policy name to better reflect the intent of the policy and the subsequent wording, which seeks to manage new developments contribution to the neighbourhood and townscape; and</p> <p>(b) The policy wording to better recognise the MCZ rule setting and the intent of the NPS-UD (particularly Policy 6) that recognises the planned urban built form and that change to existing amenity is not in itself an adverse effect; and to simplify and clarify the neighbourhood and townscape outcomes that plan is seeking to manage</p>	<p><i>Amend LCZ-P7 as follows:</i></p> <p><del>Quality design</del>—Neighbourhood and Townscape Outcomes</p> <p>Require new development, and alterations and additions to existing development at a site scale, to positively contribute to the sense of place, quality and <u>planned urban built form and function amenity</u> of Local Centre Zone by:</p> <ol style="list-style-type: none"> <li>1. Recognising the benefits of well-designed, comprehensive, development, including the extent to which the development: <ol style="list-style-type: none"> <li>a. <del>Acts as a positive catalyst for future change by reflecting</del> <u>Reflects</u> the nature and scale of the development <del>proposed-enabled</del> within the zone <del>and in the vicinity</del>, and responds to the evolving, more intensive identity of the centre;</li> <li><del>b.</del> <u>Optimises the development capacity of land, particularly sites that are:</u> <ol style="list-style-type: none"> <li><del>i.</del> <u>Large; or</u></li> <li><del>ii.</del> <u>Narrow; or</u></li> <li><del>iii.</del> <u>Vacant; or</u></li> </ol> </li> </ol> </li> </ol>

					<p><del>iv. Ground level parking areas;</del></p> <p>c. Provides for the increased levels of residential accommodation enabled in this zone; and</p> <p>d. Provides for a range of supporting business, open space and community facilities;</p> <p>3. Ensuring that the development, <del>where relevant:</del></p> <p>a. Responds to the site context, particularly where it is located adjacent to:</p> <p>i. A scheduled site of significance to tangata whenua or other Māori;</p> <p>ii. A heritage building, heritage structure or heritage area;</p> <p><del>iii. An identified character precinct;</del></p> <p>iv. Residential zoned areas;</p> <p>v. Open space zoned areas;</p> <p>b. Provides a safe and comfortable pedestrian environment;</p> <p>c. Enhances the quality of the streetscape and public / private interface;</p> <p>d. Integrates with existing and planned active and public transport movement networks; and</p> <p>e. Allows sufficient flexibility for ground floor space to be converted for a range of activities, including residential.</p>
347.	Local Centre Zone	LCZ-P8	Support in part	Kāinga Ora supports this policy in part subject to amendments to relevant rules being made to clarify the extent of on-site amenity requirements. Amendments to	<i>Amend as follows:</i>

				<p>remove communal outdoor space and outlook requirements are also sought as this is already covered by reference to outdoor space generally and this could be private outdoor space and outlook requirements should not be mandatory in a higher density living situation.</p>	<p>Amend Relevant rules to clarify this policy and delete reference to communal space and outlook as outlined below:</p> <p><b>On-site residential amenity</b></p> <p>Achieve a good standard of amenity for residential activities in the Local Centre Zone by <u>ensuring access to convenient outdoor space</u>:</p> <ol style="list-style-type: none"> <li>1. <del>Providing residents with access to adequate outlook; and</del></li> <li>2. <del>Ensuring access to convenient outdoor space, including private or shared communal areas.</del></li> </ol>
348.	Local Centre Zone	LCZ-P9	Support in part	<p>Kāinga Ora seeks amendment to the policy to specify that adverse effects that need consideration are those beyond what is anticipated in the zone, is consistent with the proposed zone framework and in accordance with Policy 6 NPSUD.</p>	<p><i>Amend LCZ-P9 as follows:</i></p> <p><b>Managing adverse effects</b></p> <p>Recognise the evolving, higher density development context enabled in the Local Centres Zone, while managing any associated adverse effects <u>beyond those anticipated within the zone</u>, including:</p> <ol style="list-style-type: none"> <li>1. Shading, privacy, bulk and dominance effects on adjacent sites; and</li> <li>2. The impact of construction on the transport network.</li> </ol>

349.	Local Centre Zone	LCZ-P10	Oppose	<p>Kāinga Ora opposes requiring 'City Outcomes Contribution' for development. This policy has the potential to disincentivise residential development. 'Over height' developments should instead be considered on their own merits and effects. Deletion sought.</p> <p>Kāinga Ora opposes this policy for the following reasons:</p> <p>(a) all of these activities are anticipated by the zone, and this policy has the potential to disincentivise intensified development;</p> <p>(b) Over height development should be assessed based on the potential or actual effects or the proposed infringement, as provided for by the rule framework;</p> <p>(c) Notwithstanding the above, there is no definition for large-scale residential, which creates ambiguity within the plan.</p>	<p><i>Amend as follows:</i></p> <p><b>City Outcomes Contribution</b></p> <p><del>Require over height, large-scale residential</del> Encourage development <u>with in Local Centre Zone in the High-Density Residential Zone</u> to <u>contribute to positive outcomes</u> deliver <del>City Outcomes Contributions as detailed and scored in the Residential Design Guide</del>, including <u>through either:</u></p> <ol style="list-style-type: none"> <li>1. Positively contributing to public space provision and the amenity of the site and surrounding area; and/or</li> <li>2. Incorporating a level of building performance that leads to reduced carbon emissions and increased climate change resilience; and/or</li> <li>3. Incorporating construction materials that increase the lifespan and resilience of the development and reduce ongoing maintenance costs; and/or</li> <li><del>4. Incorporating assisted housing into the development, and where this is provided legal instruments are required to ensure that it remains assisted housing for at least 25 years; and/or</del></li> <li>5. Enabling ease of access for people of all ages and mobility.</li> </ol>
350.	Local Centre Zone	LCZ-R10	Support in part	<p>Kāinga Ora supports this rule in part as residential activities should be enabled in Local Centres, but seeks that:</p>	<p><i>Amend LCZ-R10 as follows:</i></p> <ol style="list-style-type: none"> <li>1. Activity status: <b>Permitted</b></li> </ol>

				<p>(a) The activity status for non-compliance is amended to Restricted Discretionary with preclusion for limited notification and appropriate matters of discretion are restricted to Policy 7 and 8 matters.</p> <p>(b) Rules related to verandah coverage are removed, as it is considered that residential activities should be provided for where verandah coverage is required, particularly when ground floor development is controlled on active frontages and non-residential activity frontages in accordance with LCZ-P4.</p> <p>(c) Reference to natural hazards is removed as these matters are controlled by Natural Hazard rules and the proposed wording is inconsistent with this approach and does not manage residential activity at ground-level in hazard overlay areas.</p>	<p>Where:</p> <p>a. The activity is located:</p> <ul style="list-style-type: none"> <li>i. Above ground floor level;</li> <li>ii. At ground floor level along any street edge not identified as an active frontage;</li> <li>iii. At ground floor level along any street edge not identified as a non-residential activity frontage;</li> <li><del>iv. At ground level along any street not identified as requiring verandah coverage; or</del></li> <li><del>v. At ground level on any site contained within a Natural Hazard Overlay</del></li> </ul> <p>2. Activity status: <del>Discretionary</del> <b>Restricted</b> <del>Discretionary</del></p> <p>Where:</p> <p>a. Compliance with the requirements of LCZ-R10.1.a cannot be achieved.</p> <p><u>Matters of discretion are restricted to:</u></p> <p><b>1. <u>The matters in LCZ-P7 and LCZ-P8.</u></b></p> <p>Notification status: An application for resource consent made in respect of rule LCZ-R10.2.a is precluded from being <b>limited and</b> publicly notified.</p>
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351.	Local Centre Zone	LCZ-R11 Integrated retail activity	Support in Part	Kāinga Ora supports controlling integrated retail in Centres but considers that 20,000m <sup>2</sup> is too big for the scale of Local Centres and should be reviewed to provide an appropriate retail hierarchy to match the Centres hierarchy and ensure that opportunities for housing are not limited in Centres.	1. Activity status: <b>Permitted</b>  <b>Where:</b>  a. The total gross floor area does not exceed <del>2</del> <u>10,000</u> m <sup>2</sup> .
352.	Local Centre Zone	LCZ-R13 Carparking Activities	Support	Kāinga Ora generally supports the rule.	<i>Retain as notified.</i>
353.	Local Centre Zone	LCZ-R16 Maintenance and Repair of Buildings	Support	Kāinga Ora generally supports the rule.	<i>Retain as notified.</i>
354.	Local Centre Zone	LCZ-R17	Support in part	Kāinga Ora supports this rule in part but seeks an amendment to ensure the rule only applies to active and non-residential activity frontages.  The notification status is supported.	<i>Amend LCZ-R17 as follows:</i>  1. Activity status: <b>Permitted</b>  Where:  a. The demolition or removal of a building <u>on a site that has an active frontage or non-residential activity frontage:</u>
355.	Local Centre Zone	LCZ-R18 Construction of, or additions and	Support in part	Kāinga Ora supports this rule in part, particularly the preclusion of public and limited notification.	<i>Amend LCZ-R18 as follows:</i>  Delete 1.a.iii controlling new residential units from the permitted standard.

		alterations to, buildings and structures		<p>Kāinga Ora seeks:</p> <p>(a) amendments to remove direct reference to the design guides given their breadth and to instead rely on the urban design outcomes that are outlined by the policy references and amended standards, and</p> <p>(b) to remove reference to the “City Outcomes Contribution” as this will unduly limit intensive development and height should be assessed on its effects.</p> <p>(c) The removal of reference to residential units as the use is controlled by the activity rules.</p>	<p>.....</p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <li>1. The matters in LCZ-P6, LCZ-P7, LCZ-P8, <u>and LCZ-P9 and LCZ-P11;</u></li> <li>2. The extent and effect of non-compliance with <u>LCZ-S1, LCZ-S2, LCZ-S3, LCZ-S4, LCZ-S5, LCZ-S6, LCZ-S7, and LCZ-S8, LCZ-S9, LCZ-S10 and LCZ-S11;</u></li> <li>3. <del>The Centres and Mixed-Use Design Guide, including guideline G107—City Outcomes Contribution for any building that exceeds the maximum height requirement and either comprises 25 or more residential units or is a non-residential building;</del></li> <li>4. <del>The Residential Design Guide;</del></li> <li>5. The extent and effect of any identifiable site constraints;</li> <li>6. Construction impacts on the transport network; and</li> <li>7. The availability and connection to existing or planned three waters infrastructure.</li> </ol> <p>.....</p>
356.	Local Centre Zone	<u>NEW RULE</u>	Support	<p>Kāinga Ora seeks a new rule to allow for the Conversion of Buildings, or parts of buildings for Residential activities as a permitted activity. Residential activities are considered an appropriate activity within the LCZ, and the effects can be controlled through the standards. A consequential amendment to the rule numbering will be required to accommodate this new rule.</p>	<p>Insert new rule:</p> <p><u>2. Activity status: Permitted</u></p> <p><u>Where:</u></p> <p><u>a. The conversion of Buildings, or parts of buildings for Residential activities:</u></p>



					<p>i. <u>Do not alter the external appearance of the building or structure; and</u></p> <p>ii. <u>Complies with LCZ-S7, LCZ-S8 and LCZ-S9.</u></p>				
357.	Local Centre Zone	LCZ-R19	Support in part	<p>Kāinga Ora supports this rule in part, and particularly supports the preclusion of public and limited notification.</p> <p>Kāinga Ora seek amendments to remove direct reference to the design guide as the matters in the relevant policies include those matters articulated through the design guides.</p>	<p><i>Amend LCZ-R19 as follows:</i></p> <p>1. Activity status: <b>Restricted Discretionary</b></p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <li>The matters in LCZ-P1, LCZ-P3, LCZ-P6, <u>LCZ-P7</u> and LCZ-P8;</li> <li>The extent of compliance with standards LCZ-S7, LCZ-S8 and LCZ-S9 and satisfaction of associated assessment criteria;</li> <li><del>The Residential Design Guide</del>; and</li> <li>The availability and connection to existing or planned three waters infrastructure.</li> </ol> <p><b>Notification Status:</b> An application for resource consent made in respect of rule NLCZ-R19 is precluded from being either publicly or limited notified.</p>				
358.	Local Centre Zone	LCZ-S1	Support in part	<p>Kāinga Ora supports LCZ-S1 in part, and particularly as it enables six storey development in a number of centres.</p> <p>However, Kāinga Ora seeks amendment to enable six storey</p>	<p><i>Amend LCZ-S1 as follows:</i></p> <p><u>1. Maximum Height limits above ground level of 22m must be complied with</u></p> <table border="1" data-bbox="1406 1337 2141 1372"> <thead> <tr> <th>Location</th> <th>Limit</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> </tbody> </table>	Location	Limit		
Location	Limit								

				<p>development in Local Centres noting that Newtown, Miramar, and Tawa should be reclassified as Town Centres. Kāinga Ora considers that the zone building heights should not be reduced because of a heritage area and there is no justification for building heights of less than six storeys in the Karori centre. If heights for specific areas are to be reduced for heritage reasons this should apply through the heritage overlay provisions.</p>	<p>Height Control Area 1 - Newtown Local Centre Heritage Area Island Bay Local Centre Heritage Area Hataitai Local Centre Heritage Area</p>	<p>12 metres</p>
					<p>Height Control Area 2 - Karori</p>	<p>18 metres</p>
					<p>Height Control Area 3 - Brooklyn Churton Park Crofton Downs Island Bay Kelburn Khandallah Linden Miramar Newlands Hataitai Newtown Tawa</p>	
					<p>2. Fences or standalone walls must not exceed a maximum height of <u>21.8</u>metres (measured above ground level).</p>	

359.	Local Centre Zone	LCZ-S2	Support	Kāinga Ora generally supports the standard.	Retain as notified.								
360.	Local Centre Zone	LCZ-S3	Support	Kāinga Ora generally supports the standard.	Retain as notified.								
361.	Local Centre Zone	LCZ-S4	Support in part	<p>Kāinga Ora seeks amendments to LCZ-S4 as needed to achieve consistency with any recommended changes to the height in relation to boundary rules and height for the residential zones.</p> <p>Amendments sought.</p>	<i>Amend standards to align with changes in height and height in relation to boundary standards in the residential Zones.</i>								
362.	Local Centre Zone	LCZ-S7	Support in part	<p>Kāinga Ora supports this standard in part but seeks amendments to remove the minimum standard for 2+ bedroom units to enable greater design flexibility and decrease the minimum floor area for studio units.</p>	<p><i>Amend LCZ-S7 as follows:</i></p> <p>.....</p> <table border="1"> <thead> <tr> <th>Residential Unit Type:</th> <th>Minimum Net Floor Area</th> </tr> </thead> <tbody> <tr> <td>b. Studio unit</td> <td>305m<sup>2</sup></td> </tr> <tr> <td>c. 1 <u>or more</u> bedroom unit</td> <td>40m<sup>2</sup></td> </tr> <tr> <td><del>d. 2+ bedroom unit</del></td> <td><del>55m<sup>2</sup></del></td> </tr> </tbody> </table> <p>.....</p>	Residential Unit Type:	Minimum Net Floor Area	b. Studio unit	305m <sup>2</sup>	c. 1 <u>or more</u> bedroom unit	40m <sup>2</sup>	<del>d. 2+ bedroom unit</del>	<del>55m<sup>2</sup></del>
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363.	Local Centre Zone	LCZ-S8	Support in part.	<p>Kāinga Ora supports this standard in part but is opposed to requiring communal outdoor living space in addition to private outdoor living space. As notified, it is not clear whether communal outdoor living space is required in addition to, or as an alternative to private outdoor living space.</p> <p>Kāinga Ora seeks amendments to either:</p> <ul style="list-style-type: none"> <li>- clarify that communal outdoor living space is not required but can be provided as an alternative to private outdoor living space, or</li> <li>- to remove the requirement to provide communal outdoor living space.</li> </ul> <p>Kāinga Ora also seeks to amend the minimum dimension.</p> <p>Amendments sought.</p>	<p><i>Either amend LCZ-S8 to clarify that communal outdoor living space is not required but can be provided as an alternative to private outdoor living space;</i></p> <p><i>Or Amend LCZ-S8 as follows:</i></p> <p>.....</p> <table border="1" data-bbox="1415 499 2134 1161"> <thead> <tr> <th data-bbox="1415 499 1653 592">Living Space Type</th> <th data-bbox="1653 499 1895 592">Minimum Area</th> <th data-bbox="1895 499 2134 592">Minimum Dimension</th> </tr> </thead> <tbody> <tr> <td colspan="3" data-bbox="1415 592 2134 647">a. Private</td> </tr> <tr> <td data-bbox="1415 647 1653 847">i. Studio unit and 1-bedroom unit</td> <td data-bbox="1653 647 1895 847">5m<sup>2</sup></td> <td data-bbox="1895 647 2134 847">1.8m</td> </tr> <tr> <td data-bbox="1415 847 1653 975">ii. 2+ bedroom unit</td> <td data-bbox="1653 847 1895 975">8m<sup>2</sup></td> <td data-bbox="1895 847 2134 975">1.8m</td> </tr> <tr> <td colspan="3" data-bbox="1415 975 2134 1031"><del>b. Communal</del></td> </tr> <tr> <td data-bbox="1415 1031 1653 1161"><del>i. For every 5 units</del></td> <td data-bbox="1653 1031 1895 1161"><del>10m<sup>2</sup></del></td> <td data-bbox="1895 1031 2134 1161"><del>8m</del></td> </tr> </tbody> </table> <p>.....</p>	Living Space Type	Minimum Area	Minimum Dimension	a. Private			i. Studio unit and 1-bedroom unit	5m <sup>2</sup>	1.8m	ii. 2+ bedroom unit	8m <sup>2</sup>	1.8m	<del>b. Communal</del>			<del>i. For every 5 units</del>	<del>10m<sup>2</sup></del>	<del>8m</del>
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364.	Local Centre Zone	LCZ-S9	Oppose	<p>Kāinga Ora opposes this provision as it sets a standard that may not be possible to meet for dwellings that</p>	<p><i>Delete LCZ-S9</i></p>																		

				<p>would otherwise provide a decent standard of living.</p> <p>Deletion sought.</p>	
365.	Local Centre Zone	LCZ-S10	Oppose	<p>Kāinga Ora opposes this standard as it constrains design flexibility, and it is not clear what positive outcome it achieves. The zones are small and generally have limited depth which will place natural constraints on development and separations.</p> <p>Furthermore, these standards are not triggered by any rule and so should be deleted.</p> <p>Deletion sought.</p>	<i>Delete LCZ-S10</i>
366.	Local Centre Zone	LCZ-S11	Oppose	<p>Kāinga Ora opposes this standard as it constrains design flexibility, and it is not clear what positive outcome it achieves. The zones are small and generally have limited depth which will place natural constraints on development and separations.</p> <p>Furthermore, these standards are not triggered by any rule and so should be deleted.</p> <p>Deletion sought.</p>	<i>Delete LCZ-S11</i>

367.	TCZ – Town Centre Zone	<u>NEW TCZ Chapter and Mapping</u>	<u>NEW ZONE</u>	<p>Kāinga Ora seeks that a Town Centre category is added to the Hierarchy of Centres to include Miramar, Tawa, and Newtown.</p> <p>Kāinga Ora is seeking that Miramar, Tawa and Newtown are recognised as a Town Centre Zone. All of these centres provide a range of commercial, community, recreational and residential activities that service the needs of the immediate and neighbouring suburbs. The introduction of a Town Centre is sought to more appropriately reflect the wider catchment that these geographic centre services (both now and into the future).</p> <p>A proposed chapter with a full set of provisions has been provided in support of this submission.</p>	<ol style="list-style-type: none"> <li>1. Adopt and include a new Town Centre Zone chapter, with consequential updates to maps.</li> <li>2. Accept the proposed Town Centre Zone provisions in Appendix 2 of this submission.</li> <li>3. Seek the Miramar commercial centre is zoned as a Town Centre Zone as sought in this submission and on the planning maps in Appendix 4.</li> <li>4. Seek the Tawa commercial centre is zoned as a Town Centre Zone as sought in this submission and on the planning maps in Appendix 4.</li> <li>5. Seek the Newtown commercial centre is zoned as a Town Centre Zone as sought in this submission and on the planning maps in Appendix 4.</li> <li>6. Consequential updates to the Plan to account for the introduction of a Town Centre Zone.</li> <li>7. Accept the changes sought from Kāinga Ora to the planning maps as shown in Appendix 4 of this submission.</li> </ol>
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**PART 3 – AREA SPECIFIC MATTERS – ZONES – COMMERCIAL AND MIXED USE – MIXED USE ZONE**

368.	Mixed Use Zone	Introduction	Support in part	Kāinga Ora supports the introduction and application of a Mixed Use Zone in the proposed District Plan. Some amendments are suggested to acknowledge that the context and activities in the vicinity of Mixed Use Zones may change in the future due to the proposed Plan provision and to acknowledge NPS-UD P6.	<i>Amend Introduction as follows:</i>  Activities that generate adverse effects of a nature or scale that is potentially incompatible with the existing <u>and anticipated future</u> context will typically not be enabled in the Mixed Use Zone unless such activities can demonstrate they are able to co-exist with existing <u>and anticipated future</u> sensitive activities in the vicinity.
369.	Mixed Use Zone	MUZ-01	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified</i>
370.	Mixed Use Zone	MUZ-02	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified</i>
371.	Mixed Use Zone	MUZ-03	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified</i>
372.	Mixed Use Zone	MUZ-04	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified</i>

373.	Mixed Use Zone	MUZ-O5	Support	Kāinga Ora generally supports the objective.	<i>Retain as notified</i>
374.	Mixed Use Zone	MUZ-P1	Support in part	<p>Kāinga Ora support this policy in part but seeks amendments to recognise that the purpose of the Mixed Use zone is to allow for compatible activities to co-locate. Amendments are also sought to recognise that affordability and distribution cannot be managed through the District Plan. The focus should be on providing for the level of the activity and building form that is appropriate for a Mixed Use Zone.</p> <p>Amendment is also sought to add reference to public transport and remove the word 'convenient' which is subjective and inappropriate.</p>	<p><i>Amend MUZ-P1 as follows:</i></p> <p>Provide for the use and development of the Mixed Use Zone to meet the City's needs for business activities and <del>to a lesser extent housing</del> <u>residential activities co-located</u>, including:</p> <ol style="list-style-type: none"> <li>1. A <u>choice variety</u> of building type, size, <del>affordability and distribution</del>, including forms of medium <u>and high</u> density housing;</li> <li>2. Efficient, well integrated and strategic use of available development sites; and</li> <li>3. <del>Convenient a</del> <u>Access to</u> state highways and key transport routes <u>and public transport</u>.</li> </ol>
375.	Mixed Use Zone	MUZ-P2	Support	<p>Kāinga Ora generally supports this policy but seeks a technical amendment to correct 'community correction facility' which has no definition.</p> <p>An amendment is sought to provide for residential activities</p>	<p><i>Amend as follows:</i></p> <p>.....</p> <p>7. community correction <u>facilities activity</u></p> <p>10. Residential activities above ground floor level <u>or not located on a road frontage</u>.</p> <p>.....</p>



				which are also located to the rear of buildings i.e., not on a road frontage. The use of active frontages in the Mixed Use Zone could be considered as a means to allow residential activities to be located to the rear of buildings.	
376.	Mixed Use Zone	MUZ-P3	Support	Kāinga Ora supports this policy.	<i>Retain as notified.</i>
377.	Mixed Use Zone	MUZ-P4	Support	Kāinga Ora supports this policy.	<i>Retain as notified.</i>
378.	Mixed Use Zone	MUZ-P5	Support in part	<p>Kāinga Ora supports this policy but seeks amendments to enable ground floor residential at the rear of properties.</p> <p>An amendment is also sought to remove reference to ‘reverse sensitivity’. As the purpose of the Mixed Use Zone is to enable compatible activities (including residential) to co-locate those living and working in the zone would anticipate a particular level of amenity which can be managed through other policies, rules and standards.</p>	<p><i>Amend MUZ-P5 as follows:</i></p> <p>Ensure the ongoing functional use of the Mixed Use Zone for a range of business uses by:</p> <ol style="list-style-type: none"> <li>2. Restricting residential activities being established at the ground floor level of buildings <u>except where they are not located on a road frontage</u>; and</li> <li>3. Ensuring residential activities are designed and constructed to provide good on-site amenity, <del>and to avoid reverse sensitivity effects on non-residential activities in the area.</del></li> </ol>

379.	Mixed Use Zone	MUZ-P6	Support	Kāinga Ora generally supports this policy.	<i>Retain as notified.</i>
380.	Mixed Use Zone	MUZ-P7	Support	Kāinga Ora generally supports this policy.	<i>Retain as notified.</i>
381.	Mixed Use Zone	MUZ-P10	Support in part	<p>Kāinga Ora generally supports residential activities being permitted and supports activities being precluded from public notification but seeks amendments to:</p> <p>a. enable residential activities at ground floor where they are to the rear of a non-residential building.</p>	<p><i>Amend MUZ-R10 as follows:</i></p> <p>1. Activity status: <b>Permitted</b></p> <p>Where:</p> <p>The activity is located above ground floor level <u>or located in a building that does not have a road frontage.</u></p> <p>2. Activity status: <b>Restricted Discretionary</b></p> <p>Where:</p> <p>a. Compliance with the requirements of MUZ-R10.1 cannot be achieved.</p> <p>Matters of discretion are:</p> <ol style="list-style-type: none"> <li>1. The matters in MUZ-P1, MUZ-P2 and MUZ-P5;</li> <li>2. The extent to which the activity is the most appropriate means to meet Wellington’s future growth needs’</li> <li>3. The compatibility with existing activities nearby and other activities provided for in the Mixed Use Zone;</li> </ol>

					<p>4. The effect on the <u>visual quality character</u> of the streetscape and the extent to which the development contributes to or detracts from the pedestrian environment; and</p> <p>5. The extent to which the activity enables or limits adaptability for future non-residential activity at ground floor level.</p>
382.	Mixed Use Zone	<u>NEW RULE</u>	Support	<p>Kāinga Ora seeks that a new rule should be added permitting industrial activities except heavy industrial activities which should require resource consent as a Non-Complying Activity to give effect to MUZ-P2 &amp; MUZ-P4. As currently notified, industrial activities would always trip to Discretionary under MUZ-R13 which is inconsistent with MUZ-P2.</p> <p>A consequential amendment to the rule numbering will be required to accommodate this new rule.</p>	<p><i>Add a new rule as follows:</i></p> <p><b><u>Industrial Activities</u></b></p> <p>1. <b><u>Activity status: Permitted</u></b></p> <p><u>Where:</u></p> <p>a. <u>The activity is not a heavy industrial activity.</u></p> <p>2. <b><u>Activity Status: Non-complying</u></b></p> <p><u>Where:</u></p> <p>a. <u>Compliance with the requirements of MUZ- RX.1 cannot be achieved</u></p> <p><u>Notification status: An application for resource consent made in respect of rule MUZ-RX.2.a must be publicly notified.</u></p>
383.	Mixed Use Zone	MUZ-R16	Support in part	<p>Kāinga Ora supports this rule in part, particularly the preclusion public and limited notification.</p>	<p><i>Amend MUZ-R16 as follows:</i></p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MUZ-P2, MUZ-P5, MUZ-P6 and MUZ-P7;</p>

			<p>Kāinga Ora seek amendments to this rule to remove direct reference to the design guide as design guides should be removed from the Plan and treated as a non-statutory tool outside of the District Plan. Amendments are therefore sought to articulate the urban design outcomes that are sought and to recognise changing amenity in accordance with the NPSUD.</p> <p>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>	<ol style="list-style-type: none"> <li>2. The extent and effect of non-compliance with MUZ-S1, MUZ-S3, MUZ-S4, MUZ-S5, MUZ-S6, MUZ-S7 and MUZ-S11 as specified in the associated assessment criteria for the infringed standards;</li> <li>3. The extent of compliance with MUZ-S2;</li> <li>4. The extent of compliance with MUZ-S8, MUZ-S9 and MUZ-S10 for any part of the building used for residential activities;</li> <li>5. <del>The Centres and Mixed-Use Design Guide;</del> and</li> <li>6. <del>The Residential Design Guides for any part of a building used for residential activities.</del> <u>The extent to which the following centres and residential urban design outcomes are achieved where relevant:</u> <ol style="list-style-type: none"> <li>a. <u>Provides an effective public private interface;</u></li> <li>b. <u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood;</u></li> <li>c. <u>Provides high quality buildings.</u></li> <li>d. <u>Respond to the natural environment.</u></li> </ol> </li> </ol> <p><u>Note: Acceptable means of compliance and best practice urban design guidance is contained within the Council's Design Guidelines.</u></p>
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				Kāinga Ora seek the opportunity to review these guidelines if they are to remain a statutory document.	
384.	Mixed Use Zone	MUZ-R17	Support in part	<p>Kāinga Ora supports this rule in part, and particularly supports the preclusion of public and limited notification.</p> <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><i>Amend MUZ-R17 as follows:</i></p> <p>1. Activity status: <b>Restricted Discretionary</b></p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <li>1. The matters in MUZ-P2 and MUZ-P5;</li> <li>2. The extent of compliance with standards MUZ-S8, <u>and MUZ-S9 and MUZ-S10;</u></li> <li>3. The <u>Residential Design Guide extent to which the following residential urban design outcomes are achieved:</u> <ol style="list-style-type: none"> <li>a. <u>Provides an effective public private interface;</u></li> <li>b. <u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood;</u></li> <li>c. <u>Provides high quality buildings;</u></li> <li>d. <u>Responds to the natural environment;</u> and</li> </ol> </li> <li>4. The extent to which the conversion enables the ground floor level to be used or adapted for future non-residential activities.</li> </ol>
385.	Mixed Use Zone	MUZ-S1	Support in part	Kāinga Ora seeks amendments to MUZ-S1 to provide for building heights of at least 22 metres in all Mixed Use Zone areas to provide for appropriate levels of density.	<p><i>Amend MUZ-S1 as follows:</i></p> <ol style="list-style-type: none"> <li>1. <u>The following maximum height limits above ground level must be complied with Buildings and structures must not exceed a maximum height of 22m above ground level.</u></li> </ol>

An amendment to the fence height is also sought to allow for fences to be 2 metres high.

Location	Limit
Height Control Area 1	12 metres
Height Control Area 2	15 metres
Height Control Area 3	16 metres
Height Control Area 4	18metres

1. Fences and standalone walls must not exceed a maximum height of ~~1.8~~ 2 metres (measured above ground level).

This standard does not apply to:

1. Accessory buildings.
2. Solar panel and heating components attached to a building provided these do not exceed the height by more than 500mm.
3. Satellite dishes, antennas, aerials, chimneys, flues, architectural or decorative features (e.g., finials, spires) provided that none of these exceed 1m in diameter and do not exceed the height by more than 1m.
4. Lift overruns provided these do not exceed the height by more than 4m.

Assessment criteria where the standard is infringed:

1. Streetscape and visual amenity effects;
2. Dominance, privacy and shading effects on adjoining sites; and

					2. The extent to which <del>taller buildings would contribute to a substantial increase in residential accommodation.</del> <u>the increased building height would provide for additional development potential which is consistent with the purpose of the zone.</u>
386.	Mixed Use Zone	MUZ-S2	Oppose	Kāinga Ora seeks deletion of this standard and for a single maximum height standard to apply to the zone through MUZ-S1.	<i>Delete MUZ-S2.</i>
387.	Mixed Use Zone	MUZ-S3	Support	Kāinga Ora seeks amendments to MUZ-S3 as needed to achieve consistency with any recommended changes to the height in relation to boundary rules for the residential zones. Amendments sought.	<i>Amend standards to align with changes in height and height in relation to boundary standards in the residential Zones.</i>
388.	Mixed Use Zone	MUZ-S5	Support in part	Kāinga Ora generally supports this standards, however, as the intent is to maintain privacy for residential units' amendments are sought to exclude the provisions from applying to windows in residential units in the MUZ as the effects are comparable to those experienced between residential units in residential zones.	<i>Amend MUZ-S5 as follows:</i>  1. <u>Except for windows in a residential unit</u> opaque privacy glazing must be installed in windows where:  a. The associated building wall faces a site in any Residential Zone; and  b. The wall is located within 5m of the boundary of a site in any Residential Zone.
389.	Mixed Use Zone	MUZ-S6	Oppose	Kāinga Ora opposes this standard as it constrains development and design flexibility, and it is not clear	<i>Delete MUZ-S6</i>

				<p>what positive outcome it achieves.</p> <p>MUZ-R11 &amp; MUZ-R12 provide limits for integrated retail activity and supermarket floor areas and so it is unclear what the purpose of this rule is as it would unnecessarily constrain those developments.</p> <p>Assessment criteria 1. Relates to 'functional or operational need' for additional floor area, however, a larger floor area is clearly anticipated by MUZ-R11 and MUZ-R12</p> <p>Deletion sought.</p>											
390.	Mixed Use Zone	MUZ-S8	Support in part	<p>Kāinga Ora supports this standard in part but seeks amendments to remove the minimum standard for 2+ bedroom units to enable greater design flexibility and a smaller studio unit.</p>	<p><i>Amend MUZ-S8 as follows:</i></p> <table border="1"> <thead> <tr> <th>Residential Unit Type:</th> <th>Minimum Net Floor Area</th> </tr> </thead> <tbody> <tr> <td>a. Studio unit</td> <td>30.5m<sup>2</sup></td> </tr> <tr> <td>b. 1 <u>or more</u> bedroom unit</td> <td>40m<sup>2</sup></td> </tr> <tr> <td>c. <u>2+ bedroom unit</u></td> <td>55m<sup>2</sup></td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table>	Residential Unit Type:	Minimum Net Floor Area	a. Studio unit	30.5m <sup>2</sup>	b. 1 <u>or more</u> bedroom unit	40m <sup>2</sup>	c. <u>2+ bedroom unit</u>	55m <sup>2</sup>		
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b. 1 <u>or more</u> bedroom unit	40m <sup>2</sup>														
c. <u>2+ bedroom unit</u>	55m <sup>2</sup>														
391.	Mixed Use Zone	MUZ-S9	Support in part	<p>Kāinga Ora generally supports this standard.</p>	<p><i>Retain MUZ-S9 as notified</i></p>										



In particular assessment criteria point 3 is supported as it allows Council to consider proximity to public space in its assessment.

**PART 3 – AREA SPECIFIC MATTERS – ZONES – COMMERCIAL AND MIXED USE – METROPOLITAN CENTRE ZONE**

392.	Metropolitan Centre Zone	Introduction	Support in part	<p>Kāinga Ora supports the introduction and application of a Metropolitan Centre Zone in the Draft District Plan, subject to amendments that better reflect density and design outcomes anticipated in the NPS-UD.</p>	<p><i>Amend as follows:</i></p> <p>The Johnsonville and Kilbirnie metropolitan centres will play a critical role in accommodating forecast population growth and have significant development/redevelopment potential. To support and encourage intensification, the Metropolitan Centre Zone provides <del>substantial height limits significant opportunity for building height.</del></p> <p>...</p> <p><del>Achieving well designed buildings High quality building design</del> is a focus for these centres <del>and criteria are included to deliver this outcome.</del> The <del>building typology and design is encouraged to be significantly different to the existing built form. transition to more intensive use in metropolitan centres will result in significant changes to existing amenity values and design in the centres and their surrounds.</del> Redevelopment will be supported by a range of measures to promote good design and environmental outcomes and address amenity issues. <del>Accordingly, most building activities will require a resource consent and an assessment against the Centres and Mixed Use Design Guide.</del></p> <p>There is an identified need for significant residential</p>
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					intensification within and around the Metropolitan Centres. <del>These centres are subject to the intensification policies 3 (b) and (c) of the National Policy Statement on Urban Development 2020 (NPS-UD).</del> Accordingly, residential activity is permitted above ground floor within the centres and the High Density Residential Zone has been applied within a walkable catchment of the edge of these centres. The <del>cumulative</del> -risk from natural hazards <del>in Kilbirnie is that the intensification of this area has been tempered as a qualifying matter under Subpart 6, clause 3.32 of the NPS-UD has been addressed by applying a natural hazards overlay.</del>
393.	Metropolitan Centre Zone	MCZ-O1	Support	Kāinga Ora generally supports this objective.	Retain as notified.
394.	Metropolitan Centre Zone	MCZ-O2	Support	Kāinga Ora generally supports this objective.	Retain as notified.
395.	Metropolitan Centre Zone	MCZ-O3	Support	Kāinga Ora generally supports this objective subject to amendments to better reflect the density and design outcomes necessary to reflect the centre's location in the Centres hierarchy and the NPS-UD outcomes.	Amend as follows:  <del>Medium and</del> high density mixed-use development is achieved that positively contributes to a good quality, well-functioning urban environment <u>with a changing compact that reflects the changing</u> urban form <u>supporting high and amenity values of streets and public places of the Metropolitan Centres Zone.</u>

396.	Metropolitan Centre Zone	MCZ-O4	Support	Kāinga Ora generally supports this objective subject to amendments to better reflect the centre's location in the Centres hierarchy and the NPS-UD outcomes.	<p><i>Amend as follows:</i></p> <p>Activities will be of an appropriate scale and type to enhance the vibrancy and viability of <u>the sub-regional</u> Metropolitan Centres, <del>and reflect their sub-regional purpose.</del></p>
397.	Metropolitan Centre Zone	MCZ-P1	Support in part.	<p>Kāinga Ora generally supports this policy but seeks amendment to:</p> <p>(a) recognise the range of housing densities potentially enabled in the zone, and to recognise that tenures and affordability cannot and should not be managed through the District Plan. The focus should be on providing for the level of the activity and building form that is appropriate for a Metropolitan Centre. And;</p> <p>(b) Clarify that intent of the metropolitan zone is to enable significant intensification and height, and therefore high-density housing is the appropriate scale of development to encourage within the Metropolitan Centre.</p> <p>Amendments sought.</p>	<p><i>Amend as follows:</i></p> <p>Provide for the use and development of the Metropolitan Centre Zone to meet the City's needs for housing, business activities and community facilities, including:</p> <ol style="list-style-type: none"> <li>1. A variety of building types, sizes, <del>tenures, affordability</del> and distribution of a scale and intensity that does not undermine the ongoing viability, vibrancy and primacy of the City Centre Zone;</li> <li>2. <del>A mix of medium and</del> high-density housing;</li> </ol> <p>...</p>

398.	Metropolitan Centre Zone	MCZ-P2	Support	Kāinga Ora generally supports this policy.	<i>Retain as notified.</i>
399.	Metropolitan Centre Zone	MCZ-P5	Support	Kāinga Ora generally supports this policy.	<i>Retain as notified.</i>
400.	Metropolitan Centre Zone	MCZ-P6	Support in Part	<p>Kāinga Ora generally supports this policy but seeks amendment to:</p> <p>(a) recognise the range of housing densities potentially enabled in the zone, and to recognise that tenures and affordability cannot and should not be managed through the District Plan. The focus should be on providing for the level of the activity and building form that is appropriate for a Metropolitan Centre. And;</p> <p>(b) Clarify that intent of the metropolitan zone is to enable significant intensification and height, and therefore high-density housing is the appropriate scale of development to encourage within the Metropolitan Centre and</p>	<p><i>Amend as follows:</i></p> <p>Enable <del>medium and</del> high-density residential development that:</p> <ol style="list-style-type: none"> <li>1. Contributes towards accommodating anticipated growth in the City; and</li> <li>2. Offers a range of housing price, type, <u>and</u> size <del>and</del> <u>tenure</u> that is accessible to people of all ages, lifestyles, cultures and abilities</li> </ol>

				<p>high-density residential development can provide for a range of housing choices in itself. This position is consistent with MCZ-P7 and the intent of the MCZ.</p>	
				Amendments sought.	
401.	Metropolitan Centre Zone	MCZ-P7	Support in part	<p>Kāinga Ora generally supports this policy, but seeks amendment to:</p> <ul style="list-style-type: none"> <li>• The policy name to better reflect the intent of the policy and the subsequent wording, which seeks to manage new developments contribution to the centre and streetscape; and</li> <li>• The policy wording to better recognise the MCZ rule setting and the intent of the NPS-UD (particularly Policy 6) that recognises the planned urban built form and that change to existing amenity is not in itself an adverse effect; and to simplify and clarify the neighbourhood and townscape outcomes that plan is seeking to manage.</li> </ul>	<p><i>Amend MCZ-P7 as follows:</i></p> <p><del>Quality design Centre outcomes – neighbourhood and townscape outcomes</del></p> <p>Require new development, and alterations and additions to existing development at a site scale, to positively contribute to the sense of place, quality and <u>planned urban built form amenity and function</u> of the Metropolitan Centre Zone by:</p> <ol style="list-style-type: none"> <li>1. Recognising the benefits of well-designed, comprehensive, development, including the extent to which the development: <ol style="list-style-type: none"> <li>a. <del>Acts as a positive catalyst for future change by reflecting reflects</del> the nature and scale of <del>the</del> development <del>proposed enabled</del> within the zone <del>and in the vicinity</del>, and responds to the evolving, more intensive identity of the centre;</li> <li><del>b. Optimises the development capacity of land,, particularly sites that are:</del></li> </ol> </li> </ol> <p><del>ii. Large; or</del></p>

					<p><del>iii. Narrow; or</del> <del>iv. Vacant; or</del> <del>v. Ground level parking areas;</del></p> <p>c. Provides for the increased levels of residential accommodation enabled in this zone; and d. Provides for a range of supporting business, open space and community facilities;</p> <p>2. Ensuring that the development, where relevant:</p> <p>a. Responds to the site context, particularly where it is located adjacent to:</p> <p>i. A scheduled site of significance to tangata whenua or other Māori; ii. A heritage building, heritage structure or heritage area; iii. Residential zoned areas; iv. Open space zoned areas;</p> <p>b. Provides a safe and comfortable pedestrian environment; c. Enhances the quality of the streetscape and public / private interface; d. Integrates with existing and planned active and public transport movement networks; and</p> <p>Allows sufficient flexibility for ground floor space to be converted for a range of activities, including residential.</p>
402.	Metropolitan Centre Zone	MCZ-P8	Support in part	Kāinga Ora supports this policy in part subject to amendments to relevant rules being made to clarify the extent of on-site amenity requirements. Amendments to	<p>Amend Relevant rules to clarify this policy and delete reference to communal space as outlined below:</p> <p><b>On-site residential amenity</b></p>

				remove communal outdoor space requirements are also sought as this is already covered by reference to outdoor space generally and this could be private outdoor space.	Achieve a good standard of amenity for residential activities in the Metropolitan Centre Zone by: <ol style="list-style-type: none"> <li>1. Providing residents with access to adequate outlook; and</li> <li>2. Ensuring access to convenient outdoor space, <del>including private or shared communal areas.</del></li> </ol>
403.	Metropolitan Centre Zone	MCZ-P9	Support in part	Kāinga Ora seeks amendment to the policy to specify “adjoining properties” for the minimisation of adverse effects and clarifying that effects are those beyond those anticipated in the plan in accordance with Policy 6 NPSUD.	<i>Amend MCZ-P9 as follows:</i>  Recognise the evolving, higher density development context anticipated in the Metropolitan Centre Zone, while managing any associated adverse effects <u>beyond those anticipated within the zone</u> , including: <ol style="list-style-type: none"> <li>1. Shading, privacy, bulk and dominance effects on adjacent sites; and</li> <li>2. The impact of construction on the transport network.</li> </ol>
404.	Metropolitan Centre Zone	MCZ-P10	Support in part	Kāinga Ora opposes requiring ‘City Outcomes Contribution’ for development for the following reasons: <ul style="list-style-type: none"> <li>• it is inconsistent with the current legislative framework;</li> <li>• Over height development should be assessed based on the potential or actual effects or the proposed infringement, as provided for by the rule framework; and</li> </ul>	<i>Amend as follows:</i>  <b>City Outcomes Contribution</b>  <del>Require over height, large-scale residential, non-residential and comprehensive Encourage</del> development in the Metropolitan Centre Zone to <u>contribute to positive outcomes</u> <del>deliver City Outcomes Contributions as detailed and scored in the Centres and Mixed Use Design Guide guideline G107</del> , including through either:

				<ul style="list-style-type: none"> <li>all of these activities are anticipated by the zone, and this policy has the potential to disincentivise intensified development.</li> </ul> <p>Kāinga Ora seeks amendments to the policy to instead encourage positive outcomes for development in the MCZ.</p>	<ol style="list-style-type: none"> <li>Positively contributing to public space provision and the amenity of the site and surrounding area; and/or</li> <li>Incorporating a level of building performance that leads to reduced carbon emissions and increased climate change resilience; and/or</li> <li>Incorporating construction materials that increase the lifespan and resilience of the development and reduce ongoing maintenance costs; and/or</li> <li><del>Incorporating assisted housing into the development; and where this is provided legal instruments are required to ensure that it remains assisted housing for at least 25 years;</del> and/or</li> <li>Enabling ease of access for people of all ages and mobility.</li> </ol>
405.		MCZ-R12	Support in part	<p>Kāinga Ora supports this rule subject to amendment deleting reference to verandah control and natural hazards as these matters are not relevant to the location of residential activities or addressed in other rules such as the natural hazards rules.</p>	<p><i>Retain as notified.</i></p> <ol style="list-style-type: none"> <li>Activity status: <b>Permitted</b></li> </ol> <p>Where:</p> <ol style="list-style-type: none"> <li>The activity is located: <ol style="list-style-type: none"> <li>Above ground floor level;</li> <li>At ground floor level along any street edge not identified as an active frontage;</li> <li>At ground floor level along any street edge not identified as a non-residential activity frontage;</li> <li><del>At ground level along any street not identified as requiring verandah coverage; or</del></li> </ol> </li> </ol> <p><del>At ground level on any site contained within a Natural Hazard Overlay.</del></p>



406.	Metropolitan Centre Zone	MCZ-R18	Support	Kāinga Ora supports this permitted activity rule.	Retain as notified.
407.	Metropolitan Centre Zone	MCZ-R19	Support in part.	Kāinga Ora supports this rule in part but seeks clarification, and any necessary amendments, to ensure that this rule will not have an unintended consequence of constraining staged developments.	<i>Amend as necessary to avoid unintended consequence of constraining staged developments.</i>
408.	Metropolitan Centre Zone	MCZ-R20	Support in part	<p>Kāinga Ora supports this rule in part, and particularly the preclusion of public and limited notification.</p> <p>Kāinga Ora seek amendments to remove direct reference to the design guide and to instead articulate the urban design outcomes that are sought, and to remove reference to the “City Outcomes Contribution”. Reference to residential units should also be removed as this rule is focussed on the built form rather than activities and this would be a double up.</p> <p>Kāinga Ora seeks amendments to Standards referenced in this rule so supports this rule to the extent that those amendments are accepted.</p>	<p><i>Amend MCZ-R20 as follows:</i></p> <p>Remove reference to “the creation of new residential units” from 1. a.</p> <p>Matters of discretion are:</p> <ol style="list-style-type: none"> <li>1. The matters in MCZ-P6, MCZ-P7, MCZ-P8 and MCZ-P9;</li> <li>2. The extent and effect of non-compliance with MCZ-S1, MCZ-S2, MCZ-S3, MCZ-S4, MCZ-S5, MCZ-S6, MCZ-S7, MCZ-S8, MCZ-S9, MCZ-S10 and MCZ-S11;</li> <li>3. <del>The Centres and Mixed Use Design Guide, including guideline G107 – City Outcomes Contribution for any building that exceeds the maximum height requirement and either comprises 25 or more residential units or is a non-residential building;</del></li> <li>4. <del>The Residential Design Guide;</del></li> <li>5. <del>The following centres and residential urban design outcomes:</del> <ol style="list-style-type: none"> <li>a. <u>Provides an effective public private interface suitable for the location;</u></li> </ol> </li> </ol>

					<p>b. <u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood;</u></p> <p>c. <u>Appropriate response to neighbouring sites for the proposed activity.</u></p> <p>d. <u>Provides high quality buildings.</u></p> <p>6. The extent and effect of any identifiable site constraints;</p> <p>7. Construction impacts on the transport network; and</p> <p>8. The availability and connection to existing or planned three waters infrastructure.</p> <p>Consequential amendments to cross referenced permitted standards and Matters of Discretion identified below.</p>
409.	Metropolitan Centre Zone	MCZ-R21	Support in part	<p>Kāinga Ora supports this rule in part, and particularly supports the preclusion public and limited notification.</p> <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><i>Amend MCZ-R21 as follows:</i></p> <p>1. Activity status: <b>Restricted Discretionary</b></p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MCZ-P1, MCZ-P3, MCZ-<del>SP</del>6 and MCZ-P8;</p> <p>2. The extent of compliance with standards MCZ-S7, MCZ-P8 and MCZ-S9 and satisfaction of associated assessment criteria;</p> <p>3. <u>The Residential Design Guide; The following residential urban design outcomes:</u></p> <p>a. <u>Provides an effective public private interface;</u></p> <p>b. <u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood;</u></p> <p>c. <u>Provides high quality buildings;</u> and</p>

					<p>4. The availability and connection to existing or planned three waters infrastructure.</p> <p><b>Notification Status:</b>          An application for resource consent made in respect of rule MCZ-R21.1 is precluded from being either publicly or limited notified.</p>										
410.	Metropolitan Centre Zone	MCZ-S1	Oppose	<p>Kāinga Ora seeks amendments to provide for building heights of 15 storeys (55 metres). No clarification is provided in the plan for why height limits are required.</p> <p>Kāinga Ora seeks amendments to the Metropolitan Centre building height controls (MCZ-S1) to enable building heights of up to 15 storeys or 55 metres. This change will enable greater development capacity and is appropriate given the identification of the Metropolitan Centres as significant sub-regional centres second only to the City Centre in the city hierarchy.</p> <p>Kāinga Ora also seeks amendment to enable fence heights of up to 2 metres.</p>	<p>Amend MCZ-S1 as follows:</p> <p>1. The following maximum height limits above ground level must be complied with:</p> <table border="1" data-bbox="1413 683 2141 1193"> <thead> <tr> <th colspan="2"><u>Buildings and structures must not exceed a maximum height of 55m above ground level.</u></th> </tr> <tr> <th><u>Location</u></th> <th><u>Limit</u></th> </tr> </thead> <tbody> <tr> <td><u>Height Control Area 1</u> - <u>Johnsonville</u></td> <td><u>35 metres</u></td> </tr> <tr> <td><u>Height Control Area 2</u> <u>-Kilbirnie (except as below)</u></td> <td><u>27 metres</u></td> </tr> <tr> <td><u>Height Control Area 3</u> <u>Kilbirnie, north of Rongotai Road</u></td> <td><u>15 metres</u></td> </tr> </tbody> </table> <p>2. Fences or standalone walls no greater than <u>21.8m</u> in height.</p> <p>This standard does not apply to:</p>	<u>Buildings and structures must not exceed a maximum height of 55m above ground level.</u>		<u>Location</u>	<u>Limit</u>	<u>Height Control Area 1</u> - <u>Johnsonville</u>	<u>35 metres</u>	<u>Height Control Area 2</u> <u>-Kilbirnie (except as below)</u>	<u>27 metres</u>	<u>Height Control Area 3</u> <u>Kilbirnie, north of Rongotai Road</u>	<u>15 metres</u>
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					<ul style="list-style-type: none"> <li>a. Lot 2 DP 32689 (27 Johnsonville Road), where an 11m maximum height limit applies</li> <li>b. Accessory buildings.</li> <li>c. Solar panel and heating components attached to a building provided these do not exceed the height by more than 500mm.</li> <li>d. Satellite dishes, antennas, aerials, chimneys, flues, architectural or decorative features (e.g. finials, spires) provided that none of these exceed 1m in diameter and do not exceed the height by more than 1m.</li> <li>e. Lift overruns provided these do not exceed the height by more than 4m.</li> </ul>				
411.	Metropolitan Centre Zone	MCZ-S4	Support in Part	<p>Kāinga Ora seeks amendments to MCZ-S4 as needed to achieve consistency with any recommended changes to the height in relation to boundary rules and height for the residential zones.</p> <p>Amendments sought.</p>	<p><i>Amend standards to align with changes in height and height in relation to boundary standards in the residential Zones.</i></p>				
412.	Metropolitan Centre Zone	MCZ-S7	Support in part	<p>Kāinga Ora supports this standard in part but seeks amendments to remove the minimum standard for 2+ bedroom units to enable greater design flexibility.</p>	<p><i>Amend MCZ-S7 as follows:</i></p> <p>.....</p> <table border="1"> <thead> <tr> <th>Residential Unit Type:</th> <th>Minimum Net Floor Area</th> </tr> </thead> <tbody> <tr> <td>a. Studio unit</td> <td>30.5m<sup>2</sup></td> </tr> </tbody> </table>	Residential Unit Type:	Minimum Net Floor Area	a. Studio unit	30.5m <sup>2</sup>
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413.	Metropolitan Centre Zone	MCZ-S8	Support in part.	<p>Kāinga Ora supports this standard in part but is opposed to requiring communal outdoor living space in addition to private outdoor living space. As notified, it is not clear whether communal outdoor living space is required in addition to, or as an alternative to private outdoor living space.</p> <p>Kāinga Ora seeks amendments to either:</p> <ul style="list-style-type: none"> <li>- clarify that communal outdoor living space is not required but can be provided as an alternative to private outdoor living space, or</li> <li>- to remove the requirement to provide communal outdoor living space.</li> </ul> <p>Kāinga Ora also seeks to amend the minimum dimension.</p> <p>Amendments sought.</p>	<p><i>Either amend MCZ-S8 to clarify that communal outdoor living space is not required but can be provided as an alternative to private outdoor living space;</i></p> <p><i>Or Amend MCZ-S8 to remove reference to communal outdoor living space from the rule and amend the table as follows:</i></p> <p>.....</p> <table border="1"> <thead> <tr> <th>Living Space Type</th> <th>Minimum Area</th> <th>Minimum Dimension</th> </tr> </thead> <tbody> <tr> <td colspan="3">a. Private</td> </tr> <tr> <td>ii. Studio unit and 1-bedroom unit</td> <td>5m<sup>2</sup></td> <td>1.8m</td> </tr> <tr> <td>iii. 2+ bedroom unit</td> <td>8m<sup>2</sup></td> <td>1.8m</td> </tr> <tr> <td colspan="3"><del>b. Communal</del></td> </tr> </tbody> </table>	Living Space Type	Minimum Area	Minimum Dimension	a. Private			ii. Studio unit and 1-bedroom unit	5m <sup>2</sup>	1.8m	iii. 2+ bedroom unit	8m <sup>2</sup>	1.8m	<del>b. Communal</del>		
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					<p style="text-align: center;"><del>a. For every 5 units</del>     <del>10m<sup>2</sup></del>     <del>8m</del></p> <p>.....</p>
414.	Metropolitan Centre Zone	MCZ-S9	Oppose	<p>Kāinga Ora opposes this provision as it sets a standard that may not be possible to meet for dwellings that would otherwise provide a decent standard of living.</p> <p>Deletion sought.</p>	<i>Delete MCZ-S9</i>
415.	Metropolitan Centre Zone	MCZ-S10	Oppose	<p>Kāinga Ora opposes this standard as it constrains design flexibility, and it is not clear what positive outcome it achieves.</p> <p>Deletion sought.</p>	<i>Delete MCZ-S10</i>
416.	Metropolitan Centre Zone	MCZ-S11	Oppose	<p>Kāinga Ora opposes this standard as it constrains design flexibility, and it is not clear what positive outcome it achieves.</p> <p>Deletion sought.</p>	<i>Delete MCZ-S11</i>
<b>PART 3 – AREA SPECIFIC MATTERS – ZONES – COMMERCIAL AND MIXED USE – CITY CENTRE ZONE</b>					
417.	City Centre Zone	Introduction	Support in part	<p>Kāinga Ora generally supports the introduction and application of a City Centre Zone in the Proposed District Plan. An amendment is needed to delete Comprehensive development from the Introduction as there are no rules to implement this approach.</p>	<p><i>Amend as follows:</i></p> <p>In locations where rapid transit investment has been signalled measures have been included to enable opportunities for more intensive, <del>comprehensive</del> development to occur, particularly in areas within a walkable distance of planned rapid transit stops.</p>

418.	City Centre Zone	CCZ-01	Support	Kāinga Ora supports this objective.	<i>Retain as notified.</i>
419.	City Centre Zone	CCZ-02	Support in part	Kāinga Ora supports this objective subject to an amendment that clarifies that the Central City Zone contains high density residential living rather than medium density housing.	<p><i>Amend as follows:</i></p> <p><b>Accommodating growth</b></p> <p>The City Centre Zone plays a significant role in accommodating residential, business and supporting community service growth, and has sufficient serviced development capacity to meet its short, medium and long term residential and business growth needs, including:</p> <ol style="list-style-type: none"> <li>1. A choice of building type, size, affordability and distribution, including forms of <del>medium and</del> high-density <u>residential living housing</u>;....</li> </ol>
420.	City Centre Zone	CCZ-03	Support	Kāinga Ora supports this objective.	<i>Retain as notified.</i>
421.	City Centre Zone	CCZ-04	Support	Kāinga Ora supports this objective.	Retain as notified.
422.	City Centre Zone	CCZ-05	Support in Part	Kāinga Ora supports this objective subject to an amendment that balances the need to contribute to the amenity of neighbouring residential areas while achieving anticipated built form in accordance with the NPS-UD.	<p><i>Amend as follows:</i></p> <p><b>Amenity and design</b></p> <p>Development in the City Centre Zone positively contributes to creating a high quality, well-functioning urban environment, including:</p> <ol style="list-style-type: none"> <li>1. Reinforcing the City Centre Zone’s distinctive sense of place;</li> </ol>

					<p>2. Providing a quality and level of public and private amenity in the City Centre Zone that evolves and positively responds to anticipated growth and the diverse and changing needs of residents, businesses and visitors;</p> <p>3. Maintaining and enhancing the amenity and safety of public space;</p> <p>4. Contributing to the general amenity of neighbouring residential areas <u>while achieving the anticipated urban form of each zone.</u></p> <p>....</p>
423.	City Centre Zone	CCZ-O6	Support	Kāinga Ora supports this objective.	<i>Retain as notified.</i>
424.	City Centre Zone	CCZ-O7	Support in part	Kāinga Ora supports this objective subject to an amendment that recognises that adverse effects do not include significant changes to an area anticipated by the planned urban built form in accordance with the NPS-UD.	<p><i>Amend as follows:</i></p> <p><b>Managing adverse effects</b></p> <p>Adverse effects of activities and development <u>beyond the planned urban built form anticipated</u> in the City Centre Zone are managed effectively both:</p> <ol style="list-style-type: none"> <li>1. Within the City Centre Zone; and</li> <li>2. At interfaces with: <ol style="list-style-type: none"> <li>a. Heritage buildings, heritage structures and heritage areas;</li> <li>b. Scheduled sites and areas of significance to Māori;</li> <li>c. Identified public spaces;</li> <li>d. Identified pedestrian streets;</li> <li>e. Residential Zoned areas;</li> </ol> </li> </ol>



					<p>f. Open Space and Recreation Zoned areas; and g. The Waterfront Zone</p>
425.	City Centre Zone	CCZ-P1	Support in part	<p>Kāinga Ora supports this policy with an amendment that recognises that residential activities are generally enabled. Policy CCZ-P2 provides the specifics about activities that should be restricted, noting that this is residential activities at ground floor in areas of identified natural hazard risk. Furthermore, Natural Hazard Area provisions control the location of hazard sensitive activities, such as residential units, within these areas (e.g NH-R11).</p>	<p><i>Amend as follows:</i></p> <p><b>Enabled activities</b></p> <p>Enable a range and diversity of activities that support the purpose and ongoing viability of the City Centre Zone and enhances its vibrancy and amenity, including:</p> <ol style="list-style-type: none"> <li>1. Commercial activities;</li> <li>2. Residential activities, <b>except;</b> <ol style="list-style-type: none"> <li>a. <del>Along any street subject to active frontage and/or verandah coverage requirements;</del></li> </ol> </li> </ol> <p><del>On any site subject to an identified natural hazard risk</del></p>
426.	City Centre Zone	CCZ-P2	Support in part	<p>Kāinga Ora supports this policy subject to amendments that provide for ground floor residential activities that are not visible from streets and notes that identified hazard risk is addressed in the natural hazards chapter so does not need to be referenced here.</p>	<p><i>Amend as follows:</i></p> <p>Ground floor residential activities <b>that are visible</b> on streets identified as requiring either an active frontage or verandah coverage <del>and sites subject to an identified hazard risk.</del></p>
427.	City Centre Zone	CCZ-P3	Support	<p>Kāinga Ora supports this policy.</p>	<p><i>Retain as notified.</i></p>

428.	City Centre Zone	CCZ-P4	Support in part	Kāinga Ora support this policy but seeks amendment to recognise that tenures should not be managed through the District Plan. The focus should be on providing for the level of the activity and building form that is appropriate for a City Centre.	<p><i>Amend as follows:</i></p> <p><b>Housing choice</b></p> <p>Enable high density, good quality residential development that:</p> <ol style="list-style-type: none"> <li>1. Contributes towards accommodating anticipated growth in the city; and</li> <li>2. Offers a range of housing price, type, <b>and</b> size <b>and</b> <del>tenure</del> that is accessible to people of all ages, lifestyles, cultures and abilities</li> </ol>
429.	City Centre Zone	CCZ-P5	Support	Kāinga Ora supports this policy.	Retain as notified.
430.	City Centre Zone	CCZ-P6	Support in Part	Kāinga Ora supports adaptive use within the CCZ but seeks amendments that recognise that ground floor residential activities may be appropriate where they are located at ground floor level but not fronting active streets. Furthermore, not all hazards would restrict residential activities from locating at ground floor. For example - earthquake risk is likely to be just as high at ground floor as it is on other floors. In addition, the	<p><i>Amend as follows:</i></p> <p><b>Adaptive use</b></p> <p>Encourage new development and redevelopment in the City Centre Zone that is sustainable, resilient and adaptable to change in use over time, including enabling:</p> <ol style="list-style-type: none"> <li>1. Sufficient flexibility for ground floor space to be used and converted for a range of activities; and</li> <li>2. Residential activities at ground floor level <b>along-fronting</b> streets that are not subject to active frontage and/or</li> </ol>

				Natural hazards chapter manages this issue.	verandah coverage requirements <del>and sites free of any identified natural hazard risk.</del>
431.	City Centre Zone	CCZ-P7	Support	Kāinga Ora supports this policy.	<i>Retain as notified.</i>
432.	City Centre Zone	CCZ-P8	Support	Kāinga Ora supports this policy.	<i>Retain as notified.</i>
433.	City Centre Zone	CCZ-P9	Support in part	<p>Kāinga Ora generally supports this policy, but seeks amendment to:</p> <p>(a) The policy name to better reflect the intent of the policy and the subsequent wording, which seeks to manage new developments contribution to the city centre and streetscape; and</p> <p>(b) The policy wording to better recognise the CCZ rule setting and the intent of the NPS-UD (particularly Policy 6) that recognises the planned urban built form and that change to existing amenity is not in itself an adverse effect; and to simplify and clarify the neighbourhood and townscape</p>	<p><i>Amend CCZ-P9 as follows:</i></p> <p><del>Quality design City Centre</del> <b>outcomes</b></p> <p>Require <u>significant</u> new development, and alterations and additions to existing development, at a site scale to positively contribute to the sense of place and distinctive form, quality and <u>amenity planned urban built form and function</u> of the City Centre Zone by:</p> <ol style="list-style-type: none"> <li>1. Recognising the benefits of well-designed, <u>comprehensive intensive</u> development, including the extent to which the development:       <ol style="list-style-type: none"> <li>a. <del>Acts as a catalyst for future change by reflecting</del> <u>Reflects</u> the nature and scale of the development <u>proposed enabled</u> within the zone <del>and in the vicinity</del> and responds to the evolving, more intensive identity of the <u>neighbourhood City Centre</u>;</li> </ol> </li> </ol>

				<p>outcomes that plan is seeking to manage</p>	<ul style="list-style-type: none"> <li><del>b.</del> Optimises the development capacity of the land, particularly sites that are:             <ul style="list-style-type: none"> <li><del>i.</del> Large; or</li> <li><del>ii.</del> Narrow; or</li> <li><del>iii.</del> Vacant; or</li> <li><del>iv.</del> Ground level parking areas;</li> </ul> </li> <li>c. Provides for the increased levels of residential accommodation anticipated; and</li> <li>d. Provides for a range of supporting business, open space and community facilities; and</li> <li>2. Ensuring that development, <del>where relevant</del>:             <ul style="list-style-type: none"> <li>a. Responds to the site context, particularly where it is located adjacent to:                 <ul style="list-style-type: none"> <li>i. A scheduled site of significance to Māori;</li> <li>ii. A heritage building, heritage structure or heritage area;</li> <li>iii. An identified character <u>overlay precinct</u>;</li> <li>iv. A listed public space;</li> <li>v. Identified pedestrian streets;</li> <li>vi. Residential zones;</li> <li>vii. Open space zones; and</li> <li>viii. The Waterfront Zone;</li> </ul> </li> <li>b. Responds to the pedestrian scale of narrower streets;</li> <li>c. Responds to any identified significant natural hazard risks and climate change effects, including the strengthening and adaptive reuse of existing buildings;</li> <li>d. Provides a safe and comfortable pedestrian environment;</li> <li>e. Enhances the quality of the streetscape and the private/public interface;</li> </ul> </li> </ul>
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					<p>f. Integrates with existing and planned active and public transport activity movement networks, including planned rapid transit stops; and</p> <p>g. Allows sufficient flexibility for ground floor space to be converted to a range of activities. <del>including residential along streets that are not subject to active frontage and/or verandah coverage requirements and sites free of any identified natural hazard risk.</del></p>
434.	City Centre Zone	CCZ-P10	Support in part	<p>Kāinga Ora supports this policy in part subject to amendments to relevant rules being made to clarify the extent of on-site amenity requirements. Amendments to remove communal outdoor space requirements are also sought as this is already covered by reference to outdoor space generally and this could be private outdoor space.</p>	<p><i>Amend as follows:</i></p> <p>Ensuring access to convenient outdoor space. <del>, including private or shared communal areas.</del></p>
435.	City Centre Zone	CCZ-P11	Oppose	<p>Kāinga Ora opposes requiring 'City Outcomes Contribution' for development for the following reasons:</p> <p>a. it is inconsistent with the current legislative framework;</p> <p>b. Over height development should be assessed based on the potential or actual effects or the proposed infringement, as provided for by the rule framework; and</p>	<p><i>Amend as follows:</i></p> <p><b>City Outcomes Contribution</b></p> <p><del>Require over height, large-scale residential, non-residential and comprehensive Encourage</del> development in the City Centre Zone to <u>contribute to positive outcomes</u> <del>deliver City Outcomes Contributions as detailed and scored in the Centres and Mixed Use Design Guideline G107,</del> including through either:</p>

				<p>c. all of these activities are anticipated by the zone, and this policy has the potential to disincentivise intensified development.</p> <p>Kāinga Ora seeks amendments to the policy to instead encourage positive outcomes for development in the HRZ</p>	<ol style="list-style-type: none"> <li>1. Positively contributing to public space provision and the amenity of the site and surrounding area; and/or</li> <li>2. Incorporating a level of building performance that leads to reduced carbon emissions and increased climate change resilience; and/or</li> <li>3. Incorporating construction materials that increase the lifespan and resilience of the development and reduce ongoing maintenance costs; and/or</li> <li>4. <del>Incorporating assisted housing into the development; and where this is provided legal instruments are required to ensure that it remains assisted housing for at least 25 years;</del> and/or</li> <li>5. Enabling ease of access for people of all ages and mobility.</li> </ol>
436.	City Centre Zone	CCZ-P12	Support in part	<p>Kāinga Ora supports policy subject to amendments that reflect NPSUD Policy 6.</p>	<p><i>Amend as follows:</i></p> <p>Recognise the evolving, higher density development context anticipated in the City Centre Zone, while managing any associated adverse effects <u>beyond those anticipated within the zone</u> including:</p> <p>...</p>
437.	City Centre Zone	CCZ-R12	Support in Part	<p>Kāinga Ora supports this rule in part as residential activities should be enabled in the City Centres, but seeks that:</p> <ul style="list-style-type: none"> <li>• Active frontages are only applied to key roads</li> <li>• the activity status for non-compliance is amended to Restricted Discretionary and appropriate matters of</li> </ul>	<p><i>Amend as follows:</i></p> <p>Only apply active frontages where necessary such as along principal roads/arterials not necessary along connecting streets.</p> <ol style="list-style-type: none"> <li>1. Activity status: <b>Permitted</b></li> </ol> <p>Where:</p>

				<p>discretion are restricted to Policy 7 and 8 matters.</p> <ul style="list-style-type: none"> <li>It is unclear why verandah coverage is an issue for residential development particularly when ground floor development is controlled on active frontages and non-residential activity frontages in accordance with LCZ-P4</li> <li>Reference to natural hazards is removed as these matters are controlled by Natural Hazard rules and the proposed wording is inconsistent with this approach as this encourages residential development in hazard overlay areas. This is unnecessary duplication</li> </ul>	<p>a. The activity is located:</p> <ol style="list-style-type: none"> <li>Above ground floor level; or</li> <li>At ground floor level along any street edge not identified as an active frontage; <del>or</del></li> <li><del>At ground level along any street not identified as requiring verandah coverage; or</del></li> <li><del>At ground level on any site contained within a Natural Hazard Overlay.</del></li> </ol> <p>2. Activity status: <b><u>Discretionary Restricted Discretionary Activity</u></b></p> <p>Where:</p> <p>a. Compliance with the requirements of CCZ-R12.1.a cannot be achieved.</p> <p>Notification status: An application for resource consent made in respect of rule CCZ-R12.2.a is precluded from being publicly notified.</p> <p>Add matters of discretion that are limited to simple design limitations.</p>
438.	City Centre Zone	CCZ-R18	Support in part.	<p>Kāinga Ora supports this rule in part but seeks clarification, and any necessary amendments, to ensure that this rule will not have an unintended consequence of constraining staged developments.</p>	<p><i>Amend as necessary to avoid potential unintended consequence of constraining staged developments.</i></p>

439.	City Centre Zone	CCZ-R19	Oppose in part	<p>Kāinga Ora supports this rule in part, and particularly the preclusion of public and limited notification.</p> <p>Kāinga Ora seek amendments to remove direct reference to the design guide and to instead articulate the urban design outcomes that are sought, and to remove reference to the “City Outcomes Contribution”.</p> <p>It is unclear why the creation of new residential units needs control as residential activities are encouraged in the City Centre and other rules control the location of residential activities.</p>	<p><i>Amend CCZ-R19 as follows:</i></p> <p>Activity status: <b>Permitted</b></p> <p>Where:</p> <ol style="list-style-type: none"> <li>1. Any alterations or additions to a building or structure that: <ul style="list-style-type: none"> <li>i. Do not alter the external appearance of the building or structure; or</li> <li>ii. Relate to a building frontage below verandah level, including entranceways and glazing and compliance with CCZ-S8 is achieved; or</li> <li><del>iii. Do not result in the creation of new residential units; and</del></li> <li>iv. Are not visible from public spaces; and</li> <li>v. Comply with standards CCZ-S1, CCZ-S2, CCZ-S3, CCZ-S4, CCZ-S5, CCZ-S6, CCZ-S7 and CCZ-S8</li> </ul> </li> <li>2. Activity status: <b>Restricted Discretionary</b></li> </ol> <p>Where:</p> <ol style="list-style-type: none"> <li>a. Compliance with any of the requirements of CCZ-R19.1 cannot be achieved.</li> </ol> <p>Matters of discretion are:</p> <ol style="list-style-type: none"> <li>1. The matters in CCZ-P4, CCZ-P5, CCZ-P6, CCZ-P7, CCZ-P8, CCZ-P9, CCZ-P10, <del>CCZ-P11</del> and CCZ-P12;</li> <li>2. The extent and effect of non-compliance with CCZ-S1, CCZ-S2, CCZ-S3, CCZ-S4, CCZ-S5, CCZ-S6, CCZ-</li> </ol>
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					<p>S7, CCZ-S8, CCZ-S9, <del>CCZ-S10, CCZ-S11, CCZ-S12</del> and CCZ-S13;</p> <p>3. Construction impacts on the transport network;</p> <p>4. <u>The following urban design outcomes</u></p> <ol style="list-style-type: none"> <li><u>Provides an effective public private interface;</u></li> <li><u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood;</u></li> <li><u>Provides high quality buildings;</u></li> </ol> <p><del>5. The Centres and Mixed-Use Design Guide, including guideline G107 – City Outcomes Contribution for any building that exceeds the maximum height requirement and either comprises 50 or more residential units or is a non-residential building; and</del></p> <p><del>6. The Residential Design Guide.</del></p> <p>.....</p>
440.	City Centre Zone	CCZ-R20	Support in part	<p>Kāinga Ora supports this rule in part, and particularly the preclusion of public and limited notification.</p> <p>Kāinga Ora seek amendments to remove direct reference to the design guide and to instead articulate the urban design outcomes that are sought, and to remove reference to the “City Outcomes Contribution”.</p>	<p><i>Amend CCZ-R20 as follows:</i></p> <p>1. Activity status: <b>Restricted Discretionary</b></p> <p>Where:</p> <p>1. Compliance with any of the requirements of CCZ-R20.1, excluding CCZ-S4, cannot be achieved.</p> <p>Matters of discretion are:</p> <p>1. The matters in CCZ-P4, CCZ-P5, CCZ-P6, CCZ-P7, CCZ-P8, CCZ-P9, CCZ-P10, <del>CCZ-P11</del> and CCZ-P12;</p>

					<p>2. The extent and effect of non-compliance with CCZ-S1, CCZ-S2, CCZ-S3, CCZ-S5, CCZ-S6, CCZ-S7, CCZ-S8, CCZ-S9, <del>CCZ-S10, CCZ-S11, CCZ-S12</del> and CCZ-S13;</p> <p>3. <u>The following urban design outcomes</u></p> <ol style="list-style-type: none"> <li><u>Provides an effective public private interface;</u></li> <li><u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood; and</u></li> <li><u>Provides high quality buildings;</u></li> </ol> <p><del>4. The Centres and Mixed-Use Design Guide, including guideline G107 – City Outcomes Contribution for any building that exceeds the maximum height requirement and either comprises 50 or more residential units or is a non-residential building;</del></p> <p><del>5. The Residential Design Guide;</del></p> <p>6. The extent and effect of any identifiable site constraints;</p> <p>7. The impacts of related construction activities on the transport network; and</p> <p>8. The availability and connection to existing or planned three waters infrastructure</p> <p>.....</p>
441.	City Centre Zone	CCZ-R21	Support in part	Kāinga Ora supports this rule in part, and particularly supports the preclusion public and limited notification.	<p><i>Amend CCZ-R21 as follows:</i></p> <ol style="list-style-type: none"> <li>Activity status: <b>Restricted Discretionary</b></li> </ol> <p>Matters of discretion are:</p>

				<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>	<ol style="list-style-type: none"> <li>1. The matters in <u>CCZ-P1</u>, <u>CCZ-P4</u> and <u>CCZ-P10</u>;</li> <li>2. The extent of compliance with standards <u>CCZ-S9</u>, <del>CCZ-S10</del> and <u>CCZ-S13</u> and satisfaction of associated assessment criteria;</li> <li>3. <del>The relevant guidance contained within the Residential Design Guide</del>; <u>The following centres urban design outcomes:</u> <ol style="list-style-type: none"> <li>a. <u>Provides an effective public private interface;</u></li> <li>b. <u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood;</u></li> <li>c. <u>Provides high quality buildings; and</u></li> </ol> </li> <li>4. The availability and connection to existing or planned three waters infrastructure....</li> </ol>								
442.	City Centre Zone	CCZ-S1	Oppose	<p>Kāinga Ora opposes the City Centre building height controls as notified and seeks that the building heights are simplified. The Central Wellington City and the City Centre Zone should provide for unlimited building heights to encourage intensification and development. There are rules and standards in the District Plan that will control bulk, location and height of buildings in the city centre. Height should not be limited in the City Centre.</p> <p>Kāinga Ora seeks simplification of the height controls.</p>	<p><i>Delete any mapping references to height limits in the CCZ.</i></p> <p><i>Amend CCZ-S1 as follows:</i></p> <p><u>There is no maximum height for buildings and structures in the City Centre Zone</u></p> <table border="1" data-bbox="1413 1038 2132 1374"> <thead> <tr> <th><b>Location</b></th> <th><b>Limit</b></th> </tr> </thead> <tbody> <tr> <td><del>a. Height Control Area 1 — Thorndon Quay</del></td> <td><del>35.4m</del></td> </tr> <tr> <td><del>b. Height Control Area 2 — Waterloo Quay section</del></td> <td><del>50m</del></td> </tr> <tr> <td><del>c. Height Control Area 3 — Bulk of Thorndon</del></td> <td><del>27m</del></td> </tr> </tbody> </table>	<b>Location</b>	<b>Limit</b>	<del>a. Height Control Area 1 — Thorndon Quay</del>	<del>35.4m</del>	<del>b. Height Control Area 2 — Waterloo Quay section</del>	<del>50m</del>	<del>c. Height Control Area 3 — Bulk of Thorndon</del>	<del>27m</del>
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				Amendments sought.	<del>d. Height Control Area 4 – Mid and Upper Molesworth Street</del> 43.8m <del>e. Height Control Area 5 – CBD East</del> 48.5m–95m <del>f. Height Control Area 6 – CBD West</del> 75m–95m <del>g. Height Control Area 7 – Eastern Edge of the CBD</del> 42.5m <del>h. Height Control Area 8 – Te Aro</del> 42.5m <del>i. Height Control Area 9 – South East, South West Zone Edge Adelaide Road</del> 28.5m <del>j. Height Control Area 10 – Adelaide Road</del> 42.5m								
443.	City Centre Zone	CCZ-S9	Support in part	Kāinga Ora supports this standard in part but seeks amendments to remove the minimum standard for 2+ bedroom units to enable greater design flexibility.	<i>Amend CCZ-S10 as follows:</i> ..... <table border="1"> <thead> <tr> <th>Residential Unit Type:</th> <th>Minimum Net Floor Area</th> </tr> </thead> <tbody> <tr> <td>b. Studio unit</td> <td><del>30</del> 5m<sup>2</sup></td> </tr> <tr> <td>c. 1 <u>or more</u> bedroom unit</td> <td>40m<sup>2</sup></td> </tr> <tr> <td><del>d. 2+ bedroom unit</del></td> <td><del>55</del>m<sup>2</sup></td> </tr> </tbody> </table> .....	Residential Unit Type:	Minimum Net Floor Area	b. Studio unit	<del>30</del> 5m <sup>2</sup>	c. 1 <u>or more</u> bedroom unit	40m <sup>2</sup>	<del>d. 2+ bedroom unit</del>	<del>55</del> m <sup>2</sup>
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444.	City Centre Zone	CCZ-S10	Oppose	<p>Kāinga Ora opposes this standard and considers the City Centre is a zone where it may be appropriate to develop residential units without outdoor living space given the access to public spaces and facilities.</p> <p>Deletion sought.</p>	<i>Delete CCZ-S10.</i>
445.	City Centre Zone	CCZ-S11	Oppose	<p>Kāinga Ora opposes this standard as it constrains design flexibility, and it is not clear what positive outcome it achieves.</p> <p>Deletion sought.</p>	<i>Delete CCZ-S11.</i>
446.	City Centre Zone	CCZ-S12	Oppose	<p>Kāinga Ora opposes this standard as it constrains design flexibility, and it is not clear what positive outcome it achieves.</p> <p>Deletion sought.</p>	<i>Delete CCZ-S12.</i>
447.	City Centre Zone	CCZ-S13	Oppose	<p>Kāinga Ora opposes this provision as it sets a standard that may not be possible to meet for dwellings that would otherwise provide a decent standard of living.</p> <p>Deletion sought.</p>	<i>Delete CCZ-S13</i>
<b>PART 3 – AREA SPECIFIC MATTERS – ZONES – SPECIAL PURPOSE – FUTURE URBAN ZONE</b>					
448.	Future Urban Zone	Future Urban Zone	Oppose	<p>Kāinga Ora seeks the deletion of this chapter given that the Future Urban Zone is applied to two Development</p>	<p>Delete the Future Urban Zone chapter and instead Zone the land at Lincolnshire Farm and Upper Stebbings/Glenside</p>

				Areas that have detailed plans and associated zoning that could be applied now so that Wellington achieves its housing capacity minimums and a well-functioning urban environment.	West in accordance with the Development Area provisions, and amendments sought, now.
<b>PART 3 – AREA SPECIFIC MATTERS – DEVELOPMENT AREAS – KILBIRNIE BUS BARNs</b>					
449.	Kilbirnie Bus Barns	All rules	Support in part	<p>Kāinga Ora seek amendments to the rules to make all necessary consequential changes in response to the rezoning of those parcels which are identified for Medium Density Residential Zone to High Density Residential Zone.</p> <p>This rezoning is sought as the sites adjoin the metropolitan centres and thereby the adjoining zoning should appropriately be High Density Residential Zone. This zone would also align in the outcomes sought in the overarching submission.</p>	<i>Consequential amendments for all rules to reflect the High Density Residential Development rules.</i>
<b>PART 3 – AREA SPECIFIC MATTERS – DEVELOPMENT AREAS – LINCOLNSHIRE FARM</b>					
450.	Lincolnshire Farm	DEV2-P5	Support in part	Kāinga Ora seek amendments to this policy to remove direct reference to the design guide and instead articulate the urban design outcomes that are sought and to	<p><i>Amend DEV2-P5 as follows:</i></p> <p><b>Amenity and Design</b> Require new development, and alterations and additions to existing development in the Lincolnshire Farm Development</p>

				<p>recognise changing amenity in accordance with the NPSUD.</p> <p>Amendments sought.</p>	<p>Area to positively contribute to the creation of a well-functioning urban environment by ensuring that it:</p> <ol style="list-style-type: none"> <li>1. <u>Fulfils the intent of the Residential Design Guide</u> <u>Achieves the following urban design outcomes:</u> <ol style="list-style-type: none"> <li>a. <u>Provides an effective public private interface;</u></li> <li>b. <u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood;</u></li> <li>c. <u>Provides high quality buildings.</u></li> <li>d. <u>Responds to the natural environment.</u></li> </ol> </li> <li>2. Adds visual diversity and interest through the overall street design and the form, landscaping, design, and siting of buildings.</li> </ol>
451.	Lincolnshire Farm	DEV2-R44	Support in part	<p>Kāinga Ora generally supports this rule although an amendment is sought to the rule title to allow the rule to apply to all buildings not just those associated with no more than three residential units on a site.</p> <p>A further amendment is sought to delete reference to MRZ-P10 which is opposed.</p>	<p><i>Amend DEV2-R44 as follows:</i></p> <p><b>Construction, addition or alteration of residential buildings and structures including accessory buildings <del>but excluding multi-unit housing — Medium-Density Residential Area</del></b></p> <ol style="list-style-type: none"> <li>1. Activity Status: <b>Permitted</b></li> </ol> <p>Where:</p> <ol style="list-style-type: none"> <li>a. <u>There are no more than three residential unit on a site; and</u></li> <li>b. Compliance is achieved with: <ol style="list-style-type: none"> <li>i. DEV2-S6;</li> <li>ii. DEV2-S7;</li> <li>iii. DEV2-S8;</li> <li>iv. DEV2-S9;</li> <li>v. DEV2-S10 only in relation to the rear yard boundary setback;</li> <li>vi. DEV2-S11;</li> <li>vii. DEV2-S12;</li> </ol> </li> </ol>

					<p>viii. DEV2-S13; ix. DEV2-S14; and x. DEV2-S15.</p> <p>2. Activity status: <b>Restricted Discretionary</b> Where: Compliance with the requirements of DEV2-R45.1 cannot be achieved.</p> <p>Matters of discretion are:</p> <ol style="list-style-type: none"> <li>1. The extent and effect of non-compliance with any relevant standard as specified in the associated assessment criteria for the infringed standards; and</li> <li>2. The matters in DEV2-P2 <del>and MRZ-P10</del>.</li> </ol> <p>Notification status: An application for resource consent made in respect of rule DEV2-R44.2 which results from non-compliance with DEV2-S6, DEV2-S7, DEV2-S8, DEV2-S9, or DEV2-S10 is precluded from being publicly notified.</p> <p>An application for resource consent made in respect of rule DEV2-R44.2 which results from non-compliance with DEV2-S11, DEV2-S12, DEV2-S13, DEV2-S14, or DEV2-S15 is precluded from being either publicly or limited notified.</p>
452.	Lincolnshire Farm	DEV2-R45	Support in part	<p>Kāinga Ora supports this rule in part, particularly the preclusion of public notification.</p> <p>Kāinga Ora seek amendments to preclude limited notification for</p>	<p><i>Amend DEV2-R45 as follows:</i></p> <p><b>Construction of buildings, accessory buildings or structures for <del>multi-unit development or a</del> retirements village, and additions or alterations to a <del>multi-unit housing or retirement village</del> – <del>Medium Density Residential Activity Area</del>.</b></p>



				<p>developments that comply with the relevant standards.</p> <p>Kāinga Ora opposes the inclusion of multi-unit housing as this can be managed through DEV2-R44 in accordance with the amendments sought to that rule.</p> <p>A further amendment is sought to delete reference to MRZ-P10 which is opposed.</p>	<p>1. Activity status: <b>Restricted Discretionary</b></p> <p>Matters of discretion are:</p> <ol style="list-style-type: none"> <li>1. The extent and effect of non-compliance with any of the follow standards as specified in the associated assessment criteria for any infringed standard:             <ol style="list-style-type: none"> <li>i. DEV2-S6;</li> <li>ii. DEV2-S7;</li> <li>iii. DEV2-S8;</li> <li>iv. DEV2-S17;</li> <li>v. DEV2-S18;</li> <li>vi. DEV2-S19; and</li> <li>vii. DEV2-S20; and</li> </ol> </li> <li>2. The extent and effect of non-compliance with the requirements in Appendix 12;</li> <li>3. <del>The matters in DEV2-P1, DEV2-P2, DEV2-P5, MRZ-P6, and MRZ-P10 for multi-unit housing; and</del></li> <li>4. <del>The matters in DEV2-P5, <u>and</u> MRZ-P5, <u>and</u> MRZ-P10 for a retirement village.</del></li> </ol> <p>Notification status: An application for resource consent made in respect of rule DEV2-R45.1 is precluded from being publicly notified.</p> <p><u>An application for resource consent made in respect of rule DEV2-R45.1 that complies with the relevant standards is precluded from public and limited notification.</u></p>
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**PART 3 – AREA SPECIFIC MATTERS – DEVELOPMENT AREAS – UPPER STEBBINGS AND GLENSIDE WEST**

453.	Upper Stebbings and Glenside West	DEV3-P5	Support in part	<p>Kāinga Ora seek amendments to this policy to remove direct reference to the design guide and instead articulate the urban design outcomes that are sought and to recognise changing amenity in accordance with the NPSUD.</p> <p>Amendments sought.</p>	<p><i>Amend DEV3-P5 as follows:</i></p> <p><b>Amenity and Design</b></p> <p>Require new development, and alterations and additions to existing development in the Lincolnshire Farm Development Area to positively contribute to the creation of a well-functioning urban environment by ensuring that it:</p> <ol style="list-style-type: none"> <li>1. <u>Fulfils the intent of the Residential Design Guide</u> <u>Achieves the following urban design outcomes:</u> <ol style="list-style-type: none"> <li>a. <u>Provides an effective public private interface;</u></li> <li>b. <u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood;</u></li> <li>c. <u>Provides high quality buildings.</u></li> <li>d. <u>Responds to the natural environment.</u></li> </ol> </li> <li>2. Adds visual diversity and interest through the overall street design and the form, landscaping, design, and siting of buildings.</li> </ol>
454.	Upper Stebbings and Glenside West	DEV3-R27	Support in part	<p>Kāinga Ora generally supports this rule although an amendment is sought to the rule title to allow the rule to apply to all buildings not just those associated with no more than three residential units on a site.</p> <p>A further amendment is sought to delete reference to MRZ-P10 which is opposed.</p>	<p><i>Amend DEV3-R27 as follows:</i></p> <p><b>Construction, addition or alteration of residential buildings and structures including accessory buildings <del>but excluding multi-unit housing</del> - Built Areas</b></p> <ol style="list-style-type: none"> <li>1. Activity Status: <b>Permitted</b> Where:       <ol style="list-style-type: none"> <li>a. <u>There are no more than three residential unit on a site;</u> <u>and</u></li> <li>b. Compliance is achieved with:           <ol style="list-style-type: none"> <li>i. DEV3-S1;</li> <li>ii. DEV3-S2;</li> </ol> </li> </ol> </li> </ol>

					<ul style="list-style-type: none"> <li>iii. DEV3-S3;</li> <li>iv. DEV3-S4;</li> <li>v. DEV3-S5 only in relation to the rear yard boundary setback;</li> <li>vi. DEV3-S6;</li> <li>vii. DEV3-S7;</li> <li>viii. DEV3-S8;</li> <li>ix. DEV3-S9;</li> <li>x. DEV3-S10; and</li> <li>xi. DEV3-S11</li> </ul> <p>2. Activity status: <b>Restricted Discretionary</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Compliance with the requirements of DEV3-R27.1 cannot be achieved.</li> </ul> <p>Matters of discretion are:</p> <ul style="list-style-type: none"> <li>1. The extent and effect of non-compliance with any relevant standard as specified in the associated assessment criteria for the infringed standards; and</li> <li>2. The matters in DEV3-P2 and <del>GRZ-P8-MRZ-P8</del>.</li> </ul> <p>Notification status:</p> <p>An application for resource consent made in respect of rule DEV3-R27.2 which results from non-compliance with DEV3-S1, DEV3-S3, DEV3-S4 or DEV3-S5 is precluded from being publicly notified.</p> <p>An application for resource consent made in respect of rule DEV3-R27.2 which results from non-compliance with DEV3-S6, DEV3-S7, DEV3-S8, DEV3-S9 or DEV3-S10 is precluded from being publicly or limited notified.</p>
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455.	Upper Stebbings and Glenside West	DEV3-R28	Support in part	<p>Kāinga Ora supports this rule in part, particularly the preclusion of public notification.</p> <p>Kāinga Ora seek amendments to preclude limited notification for developments that comply with the relevant standards.</p> <p>Kāinga Ora opposes the inclusion of multi-unit housing as this can be managed through DEV3-R27 in accordance with the amendments sought to that rule.</p> <p>A further amendment is sought to delete reference to MRZ-P10 which is opposed.</p>	<p><i>Amend DEV3-R28 as follows:</i></p> <p><b>Construction of buildings, accessory buildings or structures for <del>multi-unit development or a</del> retirements village, and additions or alterations to a <del>multi-unit housing or</del> retirement village – Built Areas</b></p> <p>1. Activity status: <b>Restricted Discretionary</b></p> <p>Matters of discretion are:</p> <ol style="list-style-type: none"> <li>1. The extent and effect of non-compliance with any of the follow standards as specified in the associated assessment criteria for any infringed standard: <ol style="list-style-type: none"> <li>a. DEV3-S1;</li> <li>b. DEV3-S2;</li> <li>c. DEV3-S3;</li> <li>d. DEV3-S4;</li> <li>e. DEV3-S5;</li> <li>f. DEV3-S12;</li> <li>g. DEV3-S13;</li> <li>h. DEV3-S14; and</li> <li>i. DEV3-S15; and</li> </ol> </li> <li>2. The extent and effect of non-compliance with the requirements in Appendix 13;</li> <li>3. <del>The matters in DEV3-P2, 4, 4, MRZ-P6, and MRZ-P10 for multi-unit housing; and</del></li> <li>4. The matters in DEV3-P2, DEV3-P5, and MRZ-P5; <del>and MRZ-P10 for a retirement village.</del></li> </ol> <p>Notification status: An application for resource consent made in respect of rule DEV3-R28.1 is precluded from being publicly notified.</p>
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					<a href="#"><u>An application for resource consent made in respect of rule DEV3-R28.1 that complies with the relevant standards is precluded from public and limited notification.</u></a>
<b>PART 3 – AREA SPECIFIC MATTERS – DESIGNATIONS - WIAL – WELLINGTON INTERNATIONAL AIRPORT LIMITED</b>					
456.	Wellington International Airport Limited	WIAL 1 Specification for obstacle limitation surfaces	Support in part	<p>Kāinga Ora seek amendments to conditions 1 of Designation WIAL 1 in order to provide greater clarity and information to assist with calculating OLS and associated maximum building heights.</p> <p>The lack of clarity and certainty around height restrictions within Designation WIAL 1 place unnecessary cost and uncertainty on landowners and may inhibit full development potential on a site.</p>	Additional diagrams and detail should be included in condition 1 of Designation WIAL 1 to provide more detail and clarity on height restrictions.

## Appendix 2: Proposed Town Centre Zone Chapter

# TCZ - Town Centre Zone

The Town Centre Zone provides a range of commercial, community, recreational and residential activities that service the needs of the immediate and neighbouring suburbs. In doing so, it offers a broad range of services, employment and living opportunities. It provides for a greater scale of development and intensity than what is enabled in the Local Centre Zone. High intensity housing is also provided for in this centre. It is anticipated that the form, appearance and amenity of the zone and its surrounds will change over time.

The Town Centre Zone provides for residential activities above ground floor. Being mostly located within residential catchments, non-residential activities and developments have the potential to generate adverse environmental effects on adjoining Residential and Open Space and Recreation Zones. Most large format retail, larger commercial and light industrial activities are not anticipated within this zone as they are more appropriately located in the Large Format Retail Zone, the Mixed Use Zone or the Metropolitan Centre Zone.

### Objectives

#### TCZ- O1 Purpose of the Town Centre Zone

Town Centres are commercial centres that:

1. Service the daily and weekly retailing needs of a broad residential catchment and businesses; and
2. Accommodate a range of commercial, recreational, and community activities as well as residential activities.

#### TCZ- O2 Planned urban built environment of the Town Centre Zone

The Town Centre Zone is a safe, vibrant, and attractive urban built environment, that is characterised by:

1. Buildings that contribute positively to the surrounding streetscape and residential environment;
2. Sites and buildings used for residential purposes that provide good quality on-site residential amenity for the health and well-being of people residing in the Zone.
3. An urban environment that is an attractive place to live, work and visit.

#### TCZ- O3 Managing the scale of use and development at Zone interface

Use and development within the Town Centre Zone:

1. Are of an appropriate scale and proportion for the purpose and planned urban built environment of the zone; and
2. Minimise adverse effects on the amenity values of adjacent sites in Residential Zones and Open Space and Recreation Zones.

<b>Policies</b>	
<b>TCZ- P1</b>	<b>Appropriate activities</b>
1. Enable activities that are compatible with the purpose of the Town Centre Zone.	
<b>TCZ- P2</b>	<b>Location of residential activity and residential units</b>
Provide for residential activity where: <ol style="list-style-type: none"> <li>1. It is located above ground floor, where located along a primary frontage identified on the planning maps; and</li> <li>2. It provides for an ongoing active frontage at a pedestrian level</li> </ol>	
<b>TCZ- P3</b>	<b>Amenity and well-being for residential activity and residential units</b>
Enable residential activity and residential units where they provide a healthy urban built environment that provides for people's amenity and well-being in respect of: <ol style="list-style-type: none"> <li>1. Access to sunlight, daylight and outdoor living space; and</li> <li>2. Privacy and site design.</li> </ol>	
<b>TCZ- P4</b>	<b>Other activities</b>
Provide for other activities within the Town Centre Zone, including larger-scale activities where: <ol style="list-style-type: none"> <li>1. Any significant adverse effects can be avoided, remedied or mitigated;</li> <li>2. For any retirement village: <ol style="list-style-type: none"> <li>a. On-site amenity for residents is provided, which reflects the nature of and diverse needs of residents of the village; and</li> <li>b. Any potential reverse sensitivity effects on the continued operation of non-residential activities are minimised; and</li> </ol> </li> <li>3. They are of a size and scale that does not undermine the role and function of the Metropolitan Centre Zone.</li> </ol>	
<b>TCZ- P5</b>	<b>Inappropriate activities</b>
Avoid activities that are incompatible with the planned purpose of the Town Centre Zone.	
<b>TCZ- P6</b>	<b>Small scale built development</b>
Enable repairs, alterations and additions to existing buildings and structures, and the erection of smaller-scale buildings and structures, that achieve the planned urban built environment for the Town Centre Zone.	
<b>TCZ- P7</b>	<b>Larger scale built development</b>
Provide for larger-scale built development that reflects the planned urban built environment of the Town Centre Zone where it can be demonstrated that the development contributes positive design outcomes taking into consideration the following design objectives as relevant to the specific site, development type, and the planned urban built environment of the zone:	

1. Optimise the quality of the outcome with an integrated, comprehensive design approach.
2. Buildings spatially define street edges in order to contribute to a high-quality public realm.
3. Provision is made for safe and convenient pedestrian movement.
4. Servicing and parking is functional and maintains a high level of public realm amenity.
5. Provide for reasonable light, outlook and internal amenity for occupied internal spaces.
6. Achieve visual interest and avoid visual monotony while also achieving aesthetic coherence and integration.
7. Achieve integrated building top and roof design.
8. Ensure materials and detailing are suitably robust and fit-for-purpose in order to maintain their appearance over time.
9. Street edges are visually interesting and active, which contribute to the safety and attractiveness of their setting.
10. Relevant sections of RESZ-P10 in regard to residential units and activities.

*Note:*

*1. Acceptable means of compliance and best practice urban design guidance is contained within the Council's Design Guidelines.*

#### **TCZ- P9 Public space interface**

Provide for development that:

1. Ensures any parking, storage and servicing areas are visually unobtrusive and are located preferably within or to the back of the building;
2. Where located along an active street frontage identified on the planning maps, creates a positive interface with the streetscape by ensuring:
  - a. Buildings are oriented towards the front boundary of the site;
  - b. A veranda or other form of shelter for pedestrians is provided;
  - c. Transparent glazing is incorporated on the ground floor that allows visibility into and out of commercial frontages and reflects whether it is a primary or secondary frontage; and
3. An obvious public entrance is provided; and
4. Where located adjacent to the Open Space Zone, buildings are encouraged to create a positive interface through the orientation of the building towards that open space.

#### **TCZ- P10 Interface with Residential Zones and Open Space and Recreation Zones**

Minimise the adverse effects from use and development within the Town Centre Zone on directly adjoining sites zoned Residential or Open Space and Recreation by ensuring that:

1. Buildings and activities are located and designed to achieve a transition at the zone interface;
2. Buildings are located and designed to minimise shading and privacy effects;
3. Buildings are of a bulk, height and form that minimises dominance and/or enclosure effects; and
4. Screening and landscaping minimise adverse visual effects.

#### **Rules**

Note: There may be a number of provisions that apply to an activity, building, structure or site. Resource consent may therefore be required under rules in this



chapter as well as other chapters. Unless specifically stated in a rule, resource consent is required under each relevant rule. The steps to determine the status of an activity are set out in the General Approach chapter.

Rules relating to subdivision, including minimum allotment sizes for each zone, are found in the Subdivision chapter.

**TCZ-R1 New buildings and structures, and alterations, repairs and additions to existing buildings and structures**

1. Activity status: **Permitted**

Where:

- a. The gross floor area of the new building or structure, or addition to an existing building or structure is no more than 450m<sup>2</sup>; and
- b. Compliance is achieved with
  - i. TCZ-S1;
  - ii. TCZ-S2;
  - iii. TCZ-S3;
  - iv. TCZ-S4;and
  - v. TCZ-S7.

Except that:

1. TCZ-S1, TCZ-S2, TCZ-S3, and TCZ-S7 do not apply to alterations and repairs to existing buildings and structures.
2. TCZ-S4 does not apply to papakāinga.

2. Activity status: **Restricted discretionary**

Where:

- a. Compliance is not achieved with TCZ-R1-1.a.

Matters of discretion are restricted to:

1. The matters in TCZ-P7.

**Notification:**

An application under this rule is precluded from being publicly and limited notified in accordance with sections 95A and 95B of the RMA.

3. Activity status: **Restricted discretionary**

Where:

- a. Compliance is not achieved with TCZ-R1-1.b.

Matters of discretion are restricted to:

1. The matters of discretion of any infringed standard.

**Notification:**

1. An application under this rule where compliance is not achieved with TCZ-S2, TCZ-S3, or TCZ-S7 is precluded from being publicly notified in accordance with section 95A of the RMA.
2. An application under this rule where compliance is not achieved with TCZ-S4 is precluded from being publicly or limited notified in accordance with sections 95A and 95B of the RMA.

<b>TCZ-R2</b>	<b>Construction activity</b>
	1. Activity status: <b>Permitted</b>
<b>TCZ-R3</b>	<b>Retail activity</b>
	1. Activity status: <b>Permitted</b>
<b>TCZ-R4</b>	<b>Commercial service activity</b>
	1. Activity status: <b>Permitted</b>
<b>TCZ-R5</b>	<b>Office</b>
	1. Activity status: <b>Permitted</b>
	Where: a. The gross floor area per tenancy does not exceed 200m <sup>2</sup> .
	2. Activity status: <b>Restricted discretionary</b>
	Where: a. Compliance is not achieved with TCZ-R5-1.a.
	Matters of discretion are restricted to: 1. The matters in TCZ-P4.
	<b>Notification:</b> An application under this rule is precluded from being publicly notified in accordance with sections 95A of the RMA.
<b>TCZ-R6</b>	<b>Food and beverage activity</b>
	1. Activity status: <b>Permitted</b>
<b>TCZ-R7</b>	<b>Healthcare activity</b>
	1. Activity status: <b>Permitted</b>
	Where: a. The gross floor area per tenancy does not exceed 450m <sup>2</sup> .
	2. Activity status: <b>Restricted discretionary</b>
	Where: a. Compliance is not achieved with TCZ-R7-1.a.
	Matters of discretion are restricted to: 1. The matters in TCZ-P4.
	<b>Notification:</b>

	An application under this rule is precluded from being publicly notified in accordance with sections 95A of the RMA.
<b>TCZ-R8</b>	<b>Educational facility</b>
	1. Activity status: <b>Permitted</b> Where: a. The gross floor area per facility does not exceed 450m <sup>2</sup> .
	2. Activity status: <b>Restricted discretionary</b> Where: a. Compliance is not achieved with TCZ-R8-1.a.  Matters of discretion are restricted to: 1. The matters in TCZ-P4.  <b>Notification:</b> An application under this rule is precluded from being publicly notified in accordance with sections 95A of the RMA.
<b>TCZ-R9</b>	<b>Community facility</b>
	1. Activity status: <b>Permitted</b>
<b>TCZ-R10</b>	<b>Visitor accommodation</b>
	1. Activity status: <b>Permitted</b>
<b>TCZ-R11</b>	<b>Supported residential care activity</b>
	1. Activity status: <b>Permitted</b>
<b>TCZ-R12</b>	<b>Community corrections activity</b>
	1. Activity status: <b>Permitted</b>
<b>TCZ-R13</b>	<b>Conservation activity</b>
	1. Activity status: <b>Permitted</b>
<b>TCZ-R14</b>	<b>Customary activity</b>
	1. Activity status: <b>Permitted</b>
<b>TCZ-R15</b>	<b>Papakāinga</b>
	1. Activity status: <b>Permitted</b> Where: a. The site is held under Te Ture Whenua Māori Act 1993;

	<ul style="list-style-type: none"> <li>b. The gross floor area of all commercial activities does not exceed 450m<sup>2</sup> per site; and</li> <li>c. The gross floor area of all community facilities does not exceed 450m<sup>2</sup> per site.</li> </ul>
	<p>2. Activity status: <b>Restricted discretionary</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Compliance is not achieved with TCZ-R15-1.a.</li> </ul> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>1. The matters in <a href="#">PK-P2</a>.</li> </ul> <p><b>Notification:</b> An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
	<p>2. Activity status: <b>Restricted discretionary</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Compliance is not achieved with TCZ-R15-1.b. or TCZ-R15-1.c</li> </ul> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>1. The matters in TCZ-P4.</li> </ul> <p><b>Notification:</b> An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
<b>TCZ-R16 Residential activity and residential unit, excluding papakāinga</b>	
	<p>1. Activity status: <b>Permitted</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Compliance is achieved with <ul style="list-style-type: none"> <li>i. TCZ-S5; and</li> <li>ii. TCZ-S6.</li> </ul> </li> </ul>
	<p>2. Activity status: <b>Restricted discretionary</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Compliance is not achieved with TCZ-S5 or TCZ-S6.</li> </ul> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>b. The matters of discretion of any infringed standard.</li> </ul> <p><b>Notification:</b> c. An application under this rule where compliance is not achieved with TCZ-R5 or TCZ-S6 is precluded from being publicly or limited notified in accordance with sections 95A and 95B of the RMA.</p>
<b>TCZ-R18 Supermarket</b>	
	<p>1. Activity status: <b>Restricted discretionary</b></p>

	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>e. The matters in TCZ-P4.</li> </ul> <p><b>Notification:</b> An application under this rule is precluded from being publicly notified in accordance with sections 95A of the RMA.</p>
<b>TCZ-R18</b>	<b>Emergency service facility</b>
	<p>1. Activity status: <b>Restricted discretionary</b></p> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>h. The matters in TCZ-P4.</li> </ul> <p><b>Notification:</b> An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
<b>TCZ-R19</b>	<b>Retirement village</b>
	<p>1. Activity status: <b>Restricted discretionary</b></p> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>1. The matters in TCZ-P4.</li> </ul> <p><b>Notification:</b> An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
<b>TCZ-R20</b>	<b>Integrated retail activity</b>
	<p>1. Activity status: <b>Restricted discretionary</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. The gross floor area of all stores and/or tenancies on the site do not exceed 450m<sup>2</sup>.</li> </ul> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> <li>1. The matters in TCZ-P4.</li> </ul> <p><b>Notification:</b> An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
	<p>2. Activity status: <b>Discretionary</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Compliance is not achieved with TCZ-R20-1.a.</li> </ul>
<b>TCZ-R21</b>	<b>Entertainment facility</b>
	<p>1. Activity status: <b>Restricted discretionary</b></p> <p>Matters of discretion are restricted to:</p>

	<p>1. The matters in TCZ-P4.</p> <p><b>Notification:</b> An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
<b>TCZ-R22</b>	<b>Large format retail activity</b>
	1. Activity status: <b>Discretionary</b>
<b>TCZ-R23</b>	<b>Drive-through activity</b>
	1. Activity status: <b>Discretionary</b>
<b>TCZ-R24</b>	<b>Any activity not otherwise listed as permitted, restricted discretionary, discretionary or non-complying</b>
	1. Activity status: <b>Discretionary</b>
<b>TCZ-R25</b>	<b>Trade supplier</b>
	1. Activity status: <b>Non-complying</b>
<b>TCZ-R26</b>	<b>Industrial activity</b>
	1. Activity status: <b>Non-complying</b>
<b>TCZ-R27</b>	<b>Primary production</b>
	1. Activity status: <b>Non-complying</b>
<b>TCZ-R28</b>	<b>Rural activities other than primary production</b>
	1. Activity status: <b>Non-complying</b>
<b>Standards</b>	
<b>TCZ-S1</b>	<b>Height</b>
<p>1. All buildings and structures must not exceed a maximum height above ground level of:</p> <ol style="list-style-type: none"> <li>a. 36 metres</li> </ol> <p>except that:</p> <ul style="list-style-type: none"> <li>• Any fence or standalone wall along a side or rear boundary which adjoins a site zoned High Density Residential Zone, Medium Density Residential Zone, Open Space Zone or Sport and Active Recreation Zone must not exceed 2m in height.</li> </ul>	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <li>1. The location, design and appearance of the building or structure;</li> <li>2. Loss of sunlight to adjacent public space;</li> <li>3. Visual dominance, shading and loss of privacy for adjoining Residential or Open Space and Recreation zoned sites;</li> <li>4. Wind effects on the safety and amenity of the adjacent public space;</li> <li>5. Shading to surrounding buildings;</li> </ol>

This standard does not apply to:

- a. Solar water heating components provided these do not exceed the height by more than 1m;
- b. Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- c. Antennas, aerials, and flues provided these do not exceed the height by more than 1m; or
- d. Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.
- e. Lift overruns provided these do not exceed the height by more than 1m.

6. The planned urban built environment; and
7. Whether an increase in building height results from a response to natural hazard mitigation.

**TCZ- S2 Height in relation to boundary**

1. All buildings and structures must not project beyond a:

- a. 60° recession plane measured from a point 4m vertically above ground level along any side or rear boundary where that boundary adjoins a site zoned Medium Density Residential Zone, Open Space Zone or Sport and Active Recreation Zone; or
- b. 60° recession plane measured from a point 8m vertically above ground level along any side or rear boundary where that boundary adjoins a site zoned High Density Residential Zone.

Except that:

- 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.

Matters of discretion are restricted to:

1. Visual dominance, shading and loss of privacy for adjoining Residential or Open Space and Recreation zoned sites;
2. The location, design and appearance of the building or structure;
3. Whether an increase in height in relation to boundary results from a response to natural hazard mitigation; and
4. Whether topographical or other site constraints make compliance with the standard impractical.

This standard does not apply to:

- A boundary with a road;
- Site boundaries where there is an existing common wall between 2 buildings on adjacent sites or where a common wall is proposed;
- Solar water heating components provided these do not exceed the height in relation to boundary by more than 1 metre;
- Chimney structures not exceeding 1.1 metres in width on any elevation and provided these do not exceed the height in relation to boundary by more than 1 metre; or
- Antennas, aerials, satellite dishes (less than 1 metre in diameter), flues, and architectural features (e.g. finials, spires) provided these do not exceed the height in relation to boundary by more than 3 metres measured vertically.

**TCZ- S3      Setback**

1. Buildings and structures must not be located within a 3m setback from a side or rear boundary where that boundary adjoins a Medium Density Residential Zone, High Density Residential Zone, Open Space Zone or Sport and Active Recreation Zone.

2. Buildings and structures must not be located within a 1.5m setback from a boundary with a rail corridor.

TCZ-S3-1 does not apply to:

- One accessory building or structure less than 2m in height and less than 7m long per site; or
- Fences or standalone walls.

Matters of discretion are restricted to:

1. Screening, planting and landscaping of the building or structure;
2. The amenity of adjoining Residential or Open Space and Recreation sites;
3. Any benefits, including the extent to which the reduced setback will result in a more efficient, practical and better use of the balance of the site; and
4. Whether there are topographical or other site constraints that make compliance with the permitted standard impractical.

Except that:  
On sites where TCZ-S3-2 applies, and the building or structure setback otherwise complies with TCZ-S3-1:

Matters of discretion are restricted to:



1. The safe and efficient operation of the rail network.

**TCZ-S4 Active street frontages**

1. For sites with primary frontages and building lines identified on the planning maps, all buildings must be built up to and oriented towards the identified building line and provide a veranda that:

- a. Extends along the entire length of the building frontage;
- b. Provides continuous shelter with any adjoining veranda; and
- c. Has a minimum setback of 500mm from any kerb face.

2. For sites with primary frontage controls identified on the planning maps:

- a. At least 55% of the ground floor building frontage must be display windows or transparent glazing; and
- b. The principal public entrance to the building must be located on the front boundary.

3. For sites with secondary frontage controls identified on the planning maps:

- a. At least 35% of the ground floor building frontage for non-residential activities must be display windows or transparent glazing.

Except that:

- This standard does not apply to existing service stations.

Matters of discretion are restricted to:

1. Whether the building promotes a positive interface with the street, community safety and visual interest;
2. Whether the building promotes a positive interface with the Open Space Zone.
3. Whether the building incorporates landscaping or other means to provide increased amenity, shade and weather protection; and
4. Whether topographical or other site constraints make compliance with the standard impractical.

**TCZ-S5 Location of residential units**

1. Along boundaries with primary street-facing facade controls identified in the planning maps, all residential units must be located above ground floor.

Matters of discretion are restricted to:

- a. The amenity and quality of the streetscape; and
- b. Whether the location of the residential units promote an active frontage, community safety and

- visual interest at the pedestrian level;
- c. Whether the design could facilitate conversion to commercial use so as not to foreclose future options.

**TCZ-  
S6 Outdoor living space**

1. Each residential unit must be provided with either a private outdoor living space or access to a communal outdoor living space;
2. Where private outdoor living space is provided it must be:
  - a. For the exclusive use of residents;
  - b. Directly accessible from a habitable room;
  - c. A single contiguous space; and
  - d. Of a minimum area and dimension as follows
    - i. Studio/1 bdrm - 5m<sup>2</sup> and 1.8m
    - ii. 2+ bdrm – 8m<sup>2</sup> and 1.8m
3. Up to 40% of above ground units on a site can be provided with a Juliet balcony instead of a balcony, patio or roof terrace under TCZ-S6-2 above.

*Note: When calculating the number of above ground residential units that can be provided with a Juliet balcony, where there is a fractional number, that number shall be rounded down. For example, 4.9 will be 4 residential units.*

4. Where communal outdoor living space is provided it does not need to be in a single continuous space but it must be:
  - a. Accessible from the residential units it serves;
  - b. A minimum area of 10m<sup>2</sup> for every 5 units that it serves and a minimum dimension of 8m; and

- Matters of discretion are restricted to:
1. Whether adequate useable space is provided on-site to accommodate outdoor activities;
  2. Whether topographical or other site constraints that make compliance with the standard impractical; and
  3. Proximity of the residential unit to accessible public open space.

- c. Free of buildings, parking spaces, and servicing and manoeuvring areas.

This standard does not apply to papakāinga.

**TCZ-S7 Screening and landscaping of service areas, outdoor storage areas and parking areas**

1. Any on-site service area, including rubbish collection areas, and area for the outdoor storage of goods or materials must, without preventing the provision of an entry point to the site, be fully screened by a 1.8m high fence or landscaping where it is visible from any:

- a. Public road;
- b. Other public space; and
- c. Directly adjoining site zoned High Density Residential, Medium Density Residential, Open Space or Sport and Active Recreation.

2. Any on-site parking area must:

- a. Be fully screened by a 1.8m high fence or landscaping from any directly adjoining site zoned High Density Residential, Medium Density Residential, Open Space or Sport and Active Recreation.
- b. Where located along a street edge, provide a landscaping strip that extends at least 1.5m from the boundary with the road and comprise a mix of trees, shrubs and ground cover plants, without preventing the provision of an entry point to the site.

Except that:

- The landscaping requirement for on-site parking areas along a street edge does not apply to individual parking spaces for residential development, if provided.

Matters of discretion are restricted to:

1. Any adverse effects on the streetscape;
2. The visual amenity of adjoining Residential and Open Space and Recreation zoned sites including shading;
3. The service and storage needs of the activity;
4. The size and location of service, storage and parking areas.

## Appendix 3: Proposed Character Area Overlay Chapter under General District-Wide Matters

# Insert Māori translation

## Character Areas

<b>CA</b>	<b>Character Areas</b>
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### Introduction

The purpose of the Character Areas chapter is to provide for the management and maintenance of character values within specifically identified areas of the City.

Character Areas are located within the City's older suburbs and are comprised of a range of older houses that are reflective of the historical development pattern of the City. The Character Areas are generally in close proximity to the City Centre Zone and are anticipated to undergo a degree of change.

The District Plan endeavours to balance the ongoing maintenance of character with the demands of future residential growth and change. The Character Areas are located in the following suburbs:

- Berhampore;
- Newtown;
- Mt Cook;
- Mt Victoria;
- Aro Valley;
- Oriental Bay; and
- Thorndon.

The Character Areas do not seek to protect historic heritage values. While some areas may also be identified as heritage areas in the District Plan, the majority of the Character Areas seek to identify existing concentrations of consistent character where the concentration of coherent development defines and contributes to their distinct character and sense of place. This character is a product of the built architectural values of the dwellings in these areas and the resultant streetscape; which collectively are the character values that are being managed or maintained in the City.

The Character Areas have been identified and mapped based on the consistency and coherence of character of the houses in these areas. The particular characteristics and values of each Character Area can be found in the Residential Design Guide.

In addition to the Character areas, Mt Victoria North Townscape Area and Oriental Bay Area are specifically identified for the management and maintenance of particular townscape values found in the City. This chapter of the District Plan includes provisions relating to these two specific areas:

### 1. Mt Victoria North Townscape Area

The Mt Victoria North Townscape Area has been identified is to provide for the management of townscape values within the Mt Victoria North area.

The Mt Victoria North Townscape Area has been identified as important due to its high visibility and proximity to St Gerard's Monastery and the escarpment below. When viewed from the City Centre (and the waterfront) the houses, monastery and escarpment combine to form one of Wellington's most iconic urban landscapes.

The District Plan seeks to manage the design of new buildings and additions and alterations to existing buildings in this area. The controls are provided to ensure that new development is well designed, respects the predominant patterns of the area and the setting of St Gerard's Monastery.

The Mt Victoria North Townscape Area does not seek to protect historic heritage values. While some parts of this Townscape Area may also be identified as heritage areas or buildings in the District Plan, this Townscape Area reflects the collective unique identity and townscape values present within the area.

While there are some sites within the Mt Victoria North Townscape Area which are also included in Character Areas, the focus of these provisions is different. Townscape focuses on long-range views from public spaces, which differs from streetscape values which are enjoyed by those in the immediate streetscape, rather than from a long-range viewpoint. Streetscape values can contribute to townscape characteristics and values but are not the primary focus of the townscape area.

## 2. Oriental Bay Area

The Oriental Bay Area recognises the unique setting, characteristics, and development potential of this area. Medium to high rise residential development is suitable here. It is also a popular recreational destination. Specific values are identified to maximise residential development potential while at the same time managing effects on the public amenity along Oriental Parade, and townscape views of St Gerard's Monastery and the escarpment below.

New buildings, and significant additions and alterations to existing buildings will be assessed to ensure that they make a positive contribution to townscape values and general amenity of the area.

### Cross references to other relevant District Plan provisions

It is important to note that in addition to the provisions in this chapter, a number of other Part 2: District-Wide chapters and Part 3: Area-specific Matters chapters also contain provisions that may be relevant. Resource consent may therefore be required under rules in this chapter as well as other chapters. Unless specifically stated in a rule or in this chapter, resource consent is required under each relevant rule. The steps to determine the status of an activity are set out in the General Approach chapter.

### Objectives

CA-01	Purpose
	Character Areas are managed to: <ol style="list-style-type: none"> <li>1. Existing concentrations of consistent character, where the concentration of coherent development defines and contributes to their distinct character and sense of place;</li> <li>2. Provide for their ongoing use and development that maintains or enhances their character; and</li> <li>3. Enable development that responds positively to the character values in the identified Character Areas.</li> </ol>

<b>CA-O2</b>	<p><b>Purpose for Mt Victoria North Townscape Area</b></p> <p>The area around St Gerard's Monastery in the northern portion of Mt Victoria and western portion of Oriental Bay is:</p> <ol style="list-style-type: none"> <li>1. Recognised as a townscape area;</li> <li>2. Managed to maintain or enhance the iconic landscape setting and townscape values;</li> <li>3. Developed in a manner that recognises and responds to the townscape values of the area; and</li> <li>4. Enabled for its ongoing use and future development.</li> </ol>
<b>CA-O3</b>	<p><b>Purpose for Oriental Bay Area</b></p> <p>The Oriental Bay Area accommodates medium to high density residential development and a range of compatible non-residential activities at ground floor that maintain or enhance the unique qualities of the Area.</p>

<b>Policies</b>	
<b>CA-P1</b>	<p><b>Identifying Character Areas</b></p> <p>Identify character areas where there are existing concentrations of a same or similar built architectural values in dwellings and the resultant streetscape, that collectively warrant to be maintained and managed as having significant character values, and the concentration of coherent development defines and contributes to their distinct character and sense of place in the City.</p>
<b>CA-P2</b>	<p><b>Maintenance of character</b></p> <p>Require new development in the Character Areas, to have regard and respond positively to the character values of the Precinct, and to:</p> <ol style="list-style-type: none"> <li>1. Maintain or enhance the identified character values within the streetscape context of the area;</li> <li>2. Maintain or enhance the qualities and cohesiveness of the streetscape;</li> <li>3. Enable development that is compatible with the identified character values of the area.</li> </ol>
<b>CA-P3</b>	<p><b>Intensification</b></p> <p>Enable residential intensification within Character Areas provided that it does not detract from the character and amenity of the Character Area in which it is located.</p>
<b>CA-P4</b>	<p><b>On-going use and repair and maintenance</b></p> <p>Enable the on-going use, development, repair and maintenance of buildings in Character Areas.</p>
<b>CA-P5</b>	<p><b>Car parking and accessory buildings</b></p> <p>Design and locate car parking, garaging, and accessory buildings to maintain and enhance the character values of the Character area in which it is located.</p>

<b>CA-P6</b>	<b>Mt Victoria North Townscape Area - maintenance of townscape values</b>  Require new development to have regard to and respond positively to the townscape values of the Mt Victoria North Townscape Area and to consider:  <ol style="list-style-type: none"><li>1. The design of any new development and its relationship to the street; and</li><li>2. The extent to which the development makes a positive contribution to the predominant pattern of development of the Mt Victoria North Townscape Area including building orientation, construction, style, and relationship to St Gerard's Monastery.</li></ol>
<b>CA-P7</b>	<b>Oriental Bay Area- managing development</b>  Manage development in the Oriental Bay Area in a manner that recognises the unique characteristics and development potential of the Area.

<b>Rules: Building and structure activities in Character Areas</b>	
<b>CA-R1</b>	<b>Maintenance and repair of existing buildings and structures</b>
	<p>1. Activity status: <b>Permitted</b></p>
<b>CA-R2</b>	<b>Construction, addition, and alteration of accessory buildings</b>
	<p>1. Activity status: <b>Permitted</b></p> <p>Where:</p> <p style="margin-left: 40px;">a. The accessory building is not located between the road boundary and the primary elevation of a residential building on the site.</p>
	<p>2. Activity status: <b>Restricted Discretionary</b></p> <p>Where:</p> <p style="margin-left: 40px;">a. Compliance with any of the requirements of CA-R2.1.a cannot be achieved.</p> <p>Matters of discretion are:</p> <p style="margin-left: 40px;">1. Streetscape, visual amenity, and effects on identified streetscape character values.</p> <p>Notification status: An application for resource consent made in respect of rule CA-R2.2.a is precluded from being publicly or limited notified.</p>
<b>CA-R3</b>	<b>Construction, addition or alteration of any buildings or structures, excluding accessory buildings</b>
	<p>1. Activity status: <b>Permitted</b></p> <p>Where:</p> <p style="margin-left: 40px;">a. The construction, addition or alternation of any building or structure is not located between the road boundary and the primary elevation of a residential building on the site.</p>
	<p>1. Activity status: <b>Restricted Discretionary</b></p> <p>Matters of discretion are:</p> <p style="margin-left: 40px;">1. The matters contained in CA-P2.</p> <p>Notification status: An application for resource consent made in respect of rule CA-R3.1 is precluded from being publicly notified.</p>



<b>CA-R4</b>	<b>Buildings and structures on or over a legal road</b>
<p>Activity status: <b>Restricted Discretionary</b></p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <li>1. Streetscape, visual amenity, and effects on identified streetscape character values;</li> <li>2. Dominance, privacy, and shading effects on adjoining properties; and</li> <li>3. Maintaining safe access and safety for road users, including pedestrians.</li> </ol> <p>Notification status: An application for resource consent made in respect of rule CA-R4.2.a is precluded from being publicly or limited notified.</p>	
<p><b>Rules: Building and structure activities in the Mount Victoria North Townscape Area</b></p>	
<b>CA-R5</b>	<b>Construction, addition or alteration of any buildings or structures in the Mount Victoria North Townscape Area</b>
<p>Activity status: <b>Restricted Discretionary</b></p> <p>Matters of discretion are:</p> <ol style="list-style-type: none"> <li>1. The matters contained in CA-P6.</li> </ol> <p>Notification status: An application for resource consent made in respect of rule CA-R5.1 is precluded from being publicly notified.</p>	

<b>Rules: Building and structure activities in the Oriental Bay Area</b>	
<b>CA-R6</b>	<b>Additions or alterations to existing buildings, structures, or accessory buildings in the Oriental Bay Area</b>
	<p>1. Activity status: <b>Permitted</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. The additions or alterations are to existing buildings three storeys or less in height (including garaging), provided that the works do not increase the height of the building above the existing highest point of the building and compliance is achieved with CA-S1 and CA-S2; or</li> <li>b. The additions or alterations do not alter the external appearance of the building, structure, or accessory building; or</li> <li>c. The additions or alterations are not visible from public places; or</li> <li>d. The additions or alterations do not require an application for building consent.</li> </ul> <p>For the purpose of this rule chimneys, flues, ventilation shafts, aerials, satellite dishes less than 1 metre in diameter, spires, flagpoles, or other decorative features shall be excluded from the measurement of the highest point.</p>
<b>CA-R7</b>	<b>Construction, alteration or addition to buildings, structures or accessory buildings that are not Permitted Activities in the Oriental Bay Area</b>
	<p>1. Activity status: <b>Restricted Discretionary</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Compliance is achieved with CA-S1 and CA-S2.</li> </ul> <p>Matters of discretion are:</p> <ul style="list-style-type: none"> <li>1. Design (including building bulk, height, and scale), external appearance and siting.</li> <li>2. The matters contained in CA-P7.</li> </ul> <p>Notification status: An application for resource consent made in respect of rule CA- R7.1.a is precluded from being publicly or limited notified.</p>
	<p>3. Activity status: <b>Discretionary</b></p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Compliance with any of the requirements of CA-S1 and CA-S2 cannot be achieved.</li> </ul>

<b>Standards - Oriental Bay Area</b>		
<b>CA-S1</b>	<b>Height in relation to boundary</b>	
<ol style="list-style-type: none"> <li>1. No height in relation to boundary except on boundaries with adjacent residential properties that are located outside the Oriental Bay Area; and</li> <li>2. Where a boundary is adjacent to a residential property located outside the Oriental Bay Area, the height in relation to boundary standard of the underlying zone of the adjacent residential property will apply.</li> </ol>	<p>Assessment criteria where the standard is infringed:</p> <ol style="list-style-type: none"> <li>1. Dominance, privacy, and shading effects on adjoining sites; and</li> <li>2. Effects on the function and associated amenity values of any adjacent open space zone.</li> </ol>	
<b>CA-S2</b>	<b>Maximum height</b>	
<ol style="list-style-type: none"> <li>1. Buildings, structures and accessory buildings must not exceed the maximum heights shown on the Oriental Bay Area Map, except for 20A Oriental Terrace where the maximum height must not be exceeded by more than 20%.</li> </ol>	<p>Assessment criteria where the standard is infringed:</p> <ol style="list-style-type: none"> <li>1. Streetscape, visual amenity, and effects on identified streetscape character values.</li> </ol>	

## **Appendix 4: Maps**

The following maps set out the amendments sought from Kāinga Ora to the Wellington City Proposed District Plan.