



Te Kaunihera o
Te Awa Kairangi ki Uta
Upper Hutt City Council

Planning for growth

INTENSIFICATION PLANNING INSTRUMENT

SUMMARY OF SUBMISSIONS

NOVEMBER 2022



Guide to Submission Summary

The following format is used to summarise submissions received on the Intensification Planning Instrument:

Submission Point	Provision	Support/Oppose/Seek amendment	Decision Sought	Reasons
Submitter xx				
S1.1				

These submissions are ordered by submitter number. Each decision requested by a submitter is individually listed (SX.X)

Making a Further Submission

Clause 8 of the First Schedule of the Resource Management Act outlines the persons that may make a further submission, being:

- (a) any person representing a relevant aspect of the public interest; and,
- (b) any person that has an interest in the proposed plan greater than the interest that the general public has; and
- (c) the local authority itself.

A further submission must be in support of or in opposition to the submissions that have already been made and which are summarised in this document.

Further submissions should be made in writing, in general accordance with Form 6 of the Resource Management Act (Forms, Fees, and Procedure) Regulations 2003. Copies of Form 6 are available from:

- HAPAI Building, 879- 881 Fergusson Drive, Upper Hutt
- Upper Hutt Library, 844 Fergusson Drive, Upper Hutt
- Pinehaven Branch Library, corner of Pinehaven Road and Jocelyn Crescent, Pinehaven, Upper Hutt
- On the Plan Change webpage at upperhuttcity.com/ipi

Further submissions may be lodged in the following ways:

Online	letskorero.upperhuttcity.com	Email	planning@uhcc.govt.nz
In Person	HAPAI Building 879- 881 Fergusson Drive Upper Hutt	Post	Intensification Planning Instrument Upper Hutt City Council Private Bag 907 Upper Hutt 5140

Submitter No.	Submitter name	Address for service
1	Keith Bennett	1 Ventura Avenue, Upper Hutt 5018
2	Silvia Purdie	11 White Road, Burnham Camp 7600
3	Hayley Downing	159 Plateau Road, Te Marua, Upper Hutt 5018
4	Grant Foster	19 McLeod Street, Elderslea, Upper Hutt 5018
5	Bob Anker	76 Katherine Mansfield Drive, RD1, Upper Hutt 5371
6	Darren Walton	9 Palfrey Street, Wallaceville, Upper Hutt 5018
7	Jo Coffey	7a Ross Grove, Trentham, Upper Hutt 5018
8	Fiona Daniel	118 Cuba Street, Petone, Lower Hutt 5012
9	Sarah [REDACTED]	[REDACTED]
10	Jonathan [REDACTED]	[REDACTED] Wallaceville, Upper Hutt 5018
11	Russell Browning	10 Wyndham Road, Pinehaven, Upper Hutt 5019
12	James Bade	16 Barton Road, Heretaunga, Upper Hutt 5018
13	Murray Cope	8 Montana Road, Totara Park, Upper Hutt 5018
14	Duncan Cameron	346B Fergusson Drive, Heretaunga, Upper Hutt 5018
15	Debbie Hawinkels	177 Mangaroa Valley Road, RD1, Upper Hutt 5371
16	Peri Zee	53A Mt Marua Drive, Timberlea, Upper Hutt 5018
17	Adam Ricketts	8 Heretaunga Square, Silverstream, Upper Hutt 5019
18	Teresa Homan	5 Elm Street, Ebdentown, Upper Hutt 5018
19	Serge Ritossa	26 Seddon Street, Wallaceville, Upper Hutt 5018
20	Andrew Knight	28 Tennyson Street, Trentham, Upper Hutt 5018
21	Lorraine Pells	67 Cashmere Avenue, Khandallah, Wellington 6035
22	Stephen Bell	11 Milton Street, Trentham, Upper Hutt 5018
23	Brad M	silentlyloud@zoho.com
24	Graham Bellamy	16 Morepork Close, Riverglade, Upper Hutt 5018
25	Anthony and Kaye Swanson	19a Joseph Grove, Elderslea, Upper Hutt 5018
26	Marian and Dennis Cole	7 Terminus Street, Silverstream, Upper Hutt 5019
27	Transpower New Zealand Limited	Environment.policy@transpower.co.nz
28	Ara Poutama Aotearoa – Department of Corrections	Private Box 1206, Wellington 6140
29	Farrah Breads Family Trust	57 Kiln Street, Silverstream, Upper Hutt 5019
30	Kim Gutchlag and Patrick Waddington	16 York Avenue, Upper Hutt 5018

31	Julie Cowan	1/51a Pine Avenue, Ebdentown, Upper Hutt 5018
32	Z Energy Limited	C/- 4Sight Consulting, 201 Victoria Street West, Auckland Central 1010
33	Fuel Companies	C/- 4Sight Consulting, 201 Victoria Street West, Auckland Central 1010
34	Mary Beth Taylor	165a Katherine Mansfield Drive, Whitemans Valley, Upper Hutt 5371
35	Wellington Electricity Lines Limited	C/- Edison Consulting Group Ltd, PO Box 875, Hamilton 3240
36	Summerset Group Holdings	PO Box 5187, Wellington 6140
37	Kimberley Vermaey	42a Cambridge Terrace, Waiwhetu, Lower Hutt 5010
38	Rowena Simpkins	45 Blueberry Grove, Timberlea, Upper Hutt 5018
39	Design Network Architecture Limited	PO Box 30614, Lower Hutt 5040
40	Dean Spicer	C/- Cuttriss Consultants Ltd, PO Box 30-429, Lower Hutt 5040
41	Greater Wellington Regional Council	PO Box 11646, Manners Street, Wellington 6142
42	Jaap Knechtmans	67 Percy Kinsman Crescent, Riverstone Terraces, Upper Hutt 5018
43	Kiwirail	Private Bag 92138, Auckland 1142
44	Jonathan Board	66 Chatsworth Road, Silverstream, Upper Hutt 5019
45	Beatrice Serrao	13 York Avenue, Heretaunga, Upper Hutt 5018
46	Blue Mountains Campus Development Limited Partnership	C/- Geoff Young, Level 2, 5 Cable Street, Wellington 6011
47	Julie Cameron	346B Fergusson Drive, Heretaunga, Upper Hutt 5018
48	Silver Stream Railway Incorporated	Reynolds Bach Drive, Stokes Valley 5019
49	Logan McLean	26B Field Street, Silverstream, Upper Hutt 5019
50	Waka Kotahi (NZ Transport Agency)	Environmentalplanning@nzta.org.nz
51	Ministry of Education Te Tāhuhu o Te Mātauranga	C/- Beca Ltd, 85 Molesworth Street, Thorndon, Wellington 6011
52	Oyster Management Limited	C/- MinterEllisonRuddWatts, PO Box 105249, Auckland 1143
53	New Zealand Defence Force	C/- Tonkin + Taylor, PO Box 5271, Victoria Street West, Auckland 1142
54	Name Withheld	C/ planning@uhcc.govt.nz
55	Duncan Stuart	1 Chalfont Road, Silverstream, Upper Hutt 5019
56	Fire and Emergency New Zealand	C/- Beca Ltd, PO Box 3942, Wellington 6140
57	Ryman Healthcare Limited	C/- Chapman Tripp, PO Box 2206, Auckland 1140
58	Kāinga Ora	Homes and Communities, PO Box 74598, Greenlane, Auckland 1546
59	Kevin von Keisenberg	31 Field Street, Silverstream, Upper Hutt 5019

60	John A Sutton	1 Heretaunga Square, Silverstream, Upper Hutt 5019
61	Prudence von Keisenberg	31 Field Street, Silverstream, Upper Hutt 5019
62	Silverstream Land Holdings Limited	C/- Building Block Planning Limited, 8a Travancore Street, Island Bay 6023
63	Alex Stopforth	8 Terminus Street, Silverstream, Upper Hutt 5019
64	Retirement Villages Association of New Zealand Incorporated	C/- Chapman Tripp, PO Box 2206, Auckland 1140
65	Stephen Pattinson	PO Box 48-070, Silverstream, Upper Hutt 5142
66	Janice Carey	22 Harewood Grove, Pinehaven, Upper Hutt 5019
67	Anthony Carey	22 Harewood Grove, Pinehaven, Upper Hutt 5019
68	Louise Cleghorn	27 King Street, Upper Hutt 5018
69	RACE Inc (Racing at Awapuni and Trentham Combined Enterprises Incorporated)	CEO@raceinc.co.nz
70	CBDI Limited and CBD Land Limited	Brendan.hogan@gilliesgroup.co.nz
71	The Heretaunga Company Ltd and The Heretaunga Company No.2 Ltd	Brendan Hogan, Gillies Group, PO Box 47153, Trentham, Upper Hutt 5143
72	Te Rūnanga o Toa Rangatira (Rūnanga) on behalf of Ngāti Toa Rangatira (Ngāti Toa)	Level 2, 2 Cobham Court, Porirua 5022
73	Jacqui Hargreaves	jacqui.hargreaves@gmail.com

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
Submitter 1: Keith Bennett				
S1.1	Not stated	Not Stated	That Upper Hutt rate payers are rightfully involved in these fundamental district planning changes that will dramatically change Upper Hutt forever.	The impact this will have on people's wellness building 3 and 6 storeys high and no height limit in the CBD taking away sunlight, you will see the contrast in the people living in them. Retirees only want single story A public meeting is called to push back on Government interfering in district planning. You won't be able to just grow your vegetables and for those that love pottering in their garden your flowers won't grow because as you know we all need sunlight and water to grow and flourish. We need it as human's not just plants and where will people charge their electric cars so who are we building them for?
Submitter 2: Silvia Purdie				
S2.1	Entire IPI	Support and seek amendment	Prioritise green spaces for every proposal for residential intensification	I support the move to urban intensification, and I want to be part of a thriving growing Upper Hutt city. My primary concern is to also provide sufficient green growing natural spaces. High density housing must be paired with careful green planning, or we just create slums for the next generation. Social, physical, mental, and spiritual health demands connection with nature
S2.2	Entire IPI	Seek amendment	Increase and protect native forest to create bird corridors and greater forest cover for the whole city	The Council must act now and give a strong lead to protect the natural spaces we already have in the city and to dedicate more land for food and biodiversity. This will have huge benefits for the people also!
S2.3	Entire IPI	Seek amendment	Dedicate land for community gardens and urban farming	Please allocate land for community gardens in every new development.
S2.4	Entire IPI	Not stated	Support community initiatives to develop gardens and food production in the city	Not stated
Submitter 3: Hayley Downing				

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S3.1	Not stated	Oppose	To think of other people and not a flash in the pan rule change.	<p>Do not support building 3 storey's high without consent and building 1m close to boundary this it will block out the houses next door sunlight and privacy. I am not in support of 3 stories high with no consents from neighbouring property, 2 level houses are ok but 3 is very intrusive.</p> <p>I do not support this as it creates a dominos affect with the house value next door and developers can buy that at a cheaper price as it has reduced the value of houses next to development, and so it continues down the street as people will sell as they don't want to feel overlooked and have no option.</p>

Submitter 4: Grant Foster

S4.1	Medium and High density residential	Oppose	Rejection of any 3+ storey buildings within pre-existing neighbourhoods. A new and more considered approach to development within the city and working closer with developers to buy, build and develop blocks of land as opposed to single titles.	<p>Oppose three dwellings—each up to three storeys. Oppose the provision for at least six storey housing and the high density areas.</p> <p>While I agree that more density and better walkable neighbourhoods are the best way forward for the city, I believe just zoning entire areas is the wrong way to go about this. I believe developments like Wallaceville Estate are positive as they are all of similar look and feel and creates better neighbourhoods and communities.</p>
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Submitter 5: Bob Anker				
S5.1	Definition - High Density Residential Zone	Seek amendment	Clarification of the mapped extent of the high density residential zone and text definition of the zone as to which shall have force	Definitions - "High Density Residential Zone means the areas identified as High Density Residential Zone on the Planning Maps" There appears to be a conflict between the maps on the extent of the high density residential zone and the text definition of the areas. When

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				there is a conflict between the text definition and the map, which one prevails?
S5.2	Definitions - Papakāinga	Seek amendment	That the definition for Papakāinga be amended to conform with the body of the document text or that the document text be amended to conform with the definition.	Definitions - "Papakāinga means housing and ancillary activities (including social, cultural, educational, recreational, and commercial activities) for tangata whenua on their ancestral land." The body of the document is proposing that there should be inclusion of General Title land owned by Māori which does not appear to be covered by the definition of Papakāinga.
S5.3	Definitions- Qualifying Matter Area	Seek amendment	That the document be changed to make it clearer as to the methodology to be employed to arrive at the average width of a waterbody	Definitions- Qualifying Matter Area (l) The areas within 20 metres of the bank of any waterbody with an average width of 3 metres or more." how is this assessed? Assessed within what linear distance upstream, downstream from a given point on the bank? An average width cannot consist of a singular point.
S5.4	Definitions - "Walkable catchment	Seek amendment	That the definition for the walkable catchments be amended to remove uncertainty.	Definitions - "Walkable catchment means areas within the High Density Residential Zone that are within a 10 minute walk of a train station, and the City Centre Zone based on average walking speeds." Rather than specify time x Average walking speed, which could be open to dispute, it would be better to state a straight-line distance – e.g. 800 metres measured on an “as the crow flies’ basis”. An explanation as to the assumptions used to arrive at that distance could be given to remove doubt. “Walking Distance” could then be included as a definition. The delineation between High Density and Medium Density has the potential to give rise to demarcation disputes and certainty of measurement will be looked for in what will be a sensitive issue. Also, this definition is incomplete as it only refers to the City Centre Zone and does not mention the other Zones as specified in the NPS-UD.

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S5.5	UFD-O3	Seek amendment	That the entire document be checked to ensure that definitions are constant throughout.	<p>UFD-O3 clearly specifies that the High Density Zone incorporates all of these [matters 1-3 listed in the objective] and would extend to walkable distance from the edge of all of these zones as per NPS-UD.</p> <p>Whilst it is clear that the intent is that the High Density Zone extends out from the Centre Zones what is not clear is whether the Centre Zone itself forms a separate and distinct enclave with its own set of rules or is itself subject to the High Density Zone rules.</p>
S5.6	UFD-P2	Seek amendment	Amend the document to make it clear whether Town Centre, Local Centre and Neighbourhood Centre Zones are enclaves with their own set of rules or are they covered by the High Density Zone rules. If the latter is the case, then the document needs to be reviewed in its entirety to remove any inconsistencies.	UFD-P2 clause 2 These zones [city centre zone, town centre zone, local centre zone & neighbourhood centre zone] plus the stations are specified to form the High Density Residential Zones – height up to 26 metres. But clauses 3 & 4 conflict with the specifications in clause 2
S5.7	TP-S8	Seek amendment	That this rule [TP-S8] be reviewed in its entirety to be certain that the wording clearly expresses the intent. Alternatively delete the rule.	TP-S8 - "Where any car parking area accommodates more than five vehicle spaces and adjoins a site which is zoned General Residential, <u>High Density Residential</u> , General Rural, Rural Production, Rural Lifestyle, Open Space or Special Activity, then it shall be effectively screened from that site by a close boarded fence, wall or landscaping of no less than 1.6m in height. A car parking area with more than five vehicle spaces that adjoins a road shall also be screened by a landscaped strip within the site of at least 0.6m in width. Note that additional landscape requirements apply in the Special Activities Zone."

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				<p>The way that this clause is worded raises a number of questions. Is it the intent that the adjoining site should be in different ownership from the location of the car park site? This clause also needs to be changed in regard to the Rural areas. In the Rural area the adjoining site may be a great distance from the location of the car parking area. It also seems that it will now capture car parks around the stations which was probably not the intention. Also, it could be effectively argued that the City Centre carparks fall under this rule as they are within Walking distance of Upper Hutt station and as such are in a High Density Residential zone.</p>
S5.8	SUB-HRZ	Seek amendment	Amend the document to give consistency of definitions within and between various sections of the District Plan.	<p>SUB-HRZ Subdivision within the High Density Residential Zone (including Precinct 2 – St Patrick’s Estate Precinct. The list in this policy does not include the Neighbourhood Centre Zone which is shown under UFD-P2.</p> <p>The High Density Zone incorporates these other zones and then extends by walking distance from the boundaries of these zones (Refer to NPS-UD which specifies that the High Density Zone extends outward from the various Centre Zone boundaries.</p>
S5.9	SUB-HRZ	Seek amendment	Clarification as to how, when and where the different sets of rules apply.	<p>SUB-HRZ "The High Density Residential Zone is to be used predominantly for residential activities with high concentration and bulk of buildings, such as apartments, and other compatible activities".</p> <p>This statement needs to be worded differently as it could be argued that it does not reflect the intended purpose of the City Centre and the other zones unless those Zones are to be regarded as enclaves with their own sets of rules.</p>

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S5.10	SUB-HRZ-O3	Seek amendment	Amend wording of SUB-HRZ-03 to change "in" to "incorporating"	SUB-HRZ-O3 "High quality Intensive residential development is provided in close proximity to rapid transport stops, community facilities and commercial activities <u>in</u> multi-storey flats and apartments" Suggest that this should be phrased as "incorporating multi storey flats and apartments".
S5.11	SUB-HRZ-P1	Seek amendment	Initiate an extensive consultation process to consider the questions and practicalities surrounding passive surveillance in relation to SUB-HRZ-P1	<p>SUB-HRZ-P1 "Encourage development to achieve attractive and safe streets and public open spaces, including by providing for passive surveillance."</p> <p>Need to define and clarify "passive surveillance". Is this what the community wants?? Have they been consulted or is this document the extent of the consultation?? Who will install? Who will monitor? How will it be used? Who will pay for it?</p> <p>As has been seen recently, in numerous Ram Raid occurrences in Auckland, the presence of surveillance does not effectively deter offending and only gives a false sense of security.</p>
S5.12	SUB-HRZ-P2	Seek amendment	Council to institute a more comprehensive study as to the actual transport needs of the community in a revised Urban environment. Establish what a community focussed public transport network needs to look like for it to be effective. Present the outcome to GWRC and Government.	<p>SUB-HRZ-P2 "Recognise the benefits of wider adoption of public transport through the increase of density along public transport corridors and within walkable catchments of centres. "</p> <p>Recognising the benefits does absolutely nothing to help individual members of the community.</p> <p>The current levels of public transport service are not fit for purpose. GWRC needs to commit to an overall increase in frequency and coverage. Try walking over 800 metres carrying a weeks' worth of shopping for a family of 5 and see</p>

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				how you get on. Better still incorporate the 2 kids under 5 as well as the shopping– not a good look!!
S5.13	SUB-HRZ-P4	Seek amendment	Amend SUB-HRZ-P4 to insert the word "in" before the words "urban areas"	SUB-HRZ-P4 "Maintain and enhance pedestrian facilities established urban areas within a walkable distance to urban railway stations and the centre zones to increase walking accessibility and safety" Insert the word "in" before "urban areas".
S5.15	SUB-HRZ-P5	Seek amendment	5.14 Include a comprehensive definition of "multi modal transport" within the "Definitions" section of this document.	SUB-HRZ-P5 "Provide for the efficient function of multimodal transport options within the road corridor within a walkable distance to urban railway stations and the centre zones" Define multimodal transport – does it include private vehicles, EV? This needs to be more clearly expressed.
S5.16	SUB-HDR-R9	Seek amendment	SUB-HDR-R9 remove the maximum size limit.	SUB-HDR-R9 "Subdivision creating one or more vacant allotments with a net site area greater than 800m ² " This rule seems to be saying that nowhere within the High Density zone can you create an allotment larger than 800m ² . The way in which the High Density zones are mapped means that they cover a large proportion of the valley floor. It was my understanding that NPS-UD had the intention of facilitating more intense development, not preventing the creation of any larger area allotment within it. This will push any larger allotments away from the valley floor and on to the slopes which will in turn create the potential for the formation of a division between the advantaged and the not so well off which in turn will encourage a mono-culture development.

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S5.17	Papakāinga chapter	Seek amendment	Delete the reference to General Title Land owned by Māori.	<p>PK – Papakāinga Background</p> <p>It is questionable as to whether there is any valid reason to incorporate General Title Land owned by Māori for the purpose of applying the concept of Papakāinga. Does Council, in fact, know what General Title Land is owned by Māori and the time that it has been held. Is there even a cross reference against title within the Land Transfer Office. I would consider that Council should exercise extreme caution before going down this path. How will Council decide whether or not any given landowner is Māori. There is no issue with Papakāinga being applied to Māori ancestral land but the definition mooted here will not be widely acceptable.</p>
S5.18	PK-R2	Seek amendment	PK-R2 remove the clause which precludes public notification	<p>PK-R2 Papakāinga on general title land</p> <p>Changing the status of land has far wider implications for neighbouring properties in that it would become eligible for the concept of Papakāinga, which to all intents and purposes amounts to a change of use within a community.</p> <p>This change of use would enable commercial activity as such it is not acceptable for the process to be conducted in secrecy. It can raise the question “what are you trying to hide and why are you trying to hide it”</p>
S5.19	PK-P1-PK-P3	Seek amendment	PK-P1 ensure that at minimum all adjoining property owners are notified and provide informed consent. Additionally, notification should be placed in the community newspaper and/or social media.	<p>PK-P1 This process [providing for Papakāinga] must be done in such a fashion that it happens under the light of public scrutiny and not hidden away.</p> <p>PK-P2 and PK-P3 specifically preclude Public Notification even when the proposed change is otherwise non-compliant. Why is there a need for secrecy.</p>

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S5.20	GRZ-P1E	Seek amendment	GRZ-P1E Provide greater clarity as to the type and range of developments envisaged.	GRZ-P1E "Provide for developments not meeting permitted activity status, while encouraging high-quality developments." This amounts to a classic each way bet. What type and range of developments are envisaged?? More relevant would be the question as to what litigation opportunities could this give rise to when an entrepreneur decides to see how far the boundaries can be pushed.
S5.21	GRZ-P1	Seek amendment	Amend clause [GRZ-P1] to provide greater clarity and consistency.	GRZ-P1 "To provide for a range of building densities within the residential areas that are compatible in form and scale with the neighbourhood's planned built form and character which takes into account the capacity of the infrastructure." It can be argued that there is a potential conflict between this clause and GRZ-P1E. Who will assess the capacity and should this be covered in the document – More potential for conflict – my expert is better than your expert. Also, there could be large sums of money riding on this type of decision process which will need to be robust.
S5.22	HRZ Chapter	Seek amendment	Amend [HRZ description] to make the document consistent.	HRZ – High Density Residential Zone "The High Density Residential Zone is located adjacent to and within a walkable catchment of the following train stations and centre zones:" The list of zones omits Neighbourhood Zone which forms part of the definition at the commencement of this document
S5.23	HRZ-O2	Seek Amendment	Amend the clause [HRZ-O2] to show the correct height specification.	HRZ-O2 Housing Variety "the neighbourhood's planned urban built character, including 3-storey buildings." Is this the appropriate clause for the High Density Zone which is up to 8 storeys.??
S5.24	HRZ-S2	Seek amendment	Amend the document to ensure consistency	HRZ-S2 Building height

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				The height specification for the High Density Zone is 26 metres NOT 20 metres. See HRZ-P7
S5.25	HRZ-S5	Seek amendment	Amend the document to ensure consistency.	HRZ-S5 Number of Residential units per site This clause [6 residential units] is not going to work if the building is 8 storeys high. Each floor may well hold more than 1 residential unit depending on the footprint of the building. More thought is needed as to the intention and the wording.
S5.26	HRZ-R8	Seek amendment	Amend this clause [HRZ-R8]	HRZ-R8 Buildings within the High Density Residential Zone that exceed 20 metres in height. Height limit is 26 Metres NOT 20 metres. See HRZ-P7
S5.27	NCZ - Neighbourhood Centre Zone	Seek amendment	Where a Centre Zone falls within the catchment created by the presence of a station then it needs to be clarified if we are dealing with a separate enclave and if so which set of rules predominates.	NCZ - Neighbourhood Centre Zone The document is conflicted as to whether this "Centre Zone" does or does not form part of the High Density Zone. The document needs to be amended so that any conflict of intention is removed. NPS-UD includes Neighbourhood as one of the defined "Centre Zones". Where a Neighbourhood Zone falls within the catchment created by the presence of a station then it needs to be clarified if we are dealing with a separate enclave and if so, which set of rules predominates
S5.28	LCZ-Local Centre Zone and MUZ-Mixed Use Zone rules	Seek amendment	All of the clauses in local centre and mixed use zone rules which relate to the City Centre Zone are tantamount to restraint of trade provisions and should be removed from the document.	Local Centre Zone "5. The location of the activity in the Local Centre Zone does not undermine the role and function of the City Centre Zone. The factors that decide where an operation should be located should be determined by Commercial reality.

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				<p>Attempts by Council to skew the factors in favour of the City Centre by regulation risk distorting the economic business realities, impact profit margins and influence whether or not a commercial enterprise decides to locate in Upper Hutt. If the commercial factors stack up, then business will gravitate to the best place for them. Council should not be seen to be favouring one group of property landlords over another which will in turn distort the rental market.</p> <p>LCZ-R5 Commercial Service Activity "2. Activity status: Restricted discretionary 3. The potential of the location of the activity in the Local Centre Zone to undermine the role and function of the City Centre Zone."</p> <p>Same observation as before. It is not the function of Council to favour one set of property landlords over another or skew business decision making process.</p> <p>LCZ-R6 Food and Beverage Activity LCZ-R7 Community Facility LCZ-R8 Healthcare Activity LCZ-R9 Educational Facility LCZ-R10 Office activity LCZ-R11 Visitor Accommodation LCZ-R13 Supermarket</p> <p>All of the above contain the same clause favouring the City Centre Zone. Clause should be removed.</p> <p>MUZ-R5 Commercial Service Activity Activity status: Restricted discretionary Same clause favouring City Centre Zone.</p> <p>MUZ-R6 Food and Beverage Activity MUZ-R7 Community Facility MUZ-R8 Healthcare Activity MUZ-R9 Educational Facility MUZ-R10 Entertainment Facility MUZ-R12 Office activity</p>

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				MUZ-R15 Visitor Accommodation Same clause favouring City Centre Zone.
S5.29	LCZ-R5 - R11 and R13 & MUZ-R5-R10	Seek amendment	All of these rules contain the same clause favouring the City Centre Zone. Clause should be removed.	LCZ-R5 - R11 and R13 & MUZ-R5-R10 2. "Activity status: Restricted discretionary 3. The potential of the location of the activity in the Local Centre Zone to undermine the role and function of the City Centre Zone." It is not the function of Council to favour one set of property landlords over another or skew business decision making process.
S5.30	TCZ - Town Centre Zone	Seek amendment	Confirm that the "City Centre Zone" clauses are to be removed. Also resolve the issue of whether the 'Centre Zones" are enclaves with distinct sets of rules. Resolve where zones overlap which rules prevail.	TCZ - Town Centre Zone "The Town Centre Zone applies to the Silverstream Centre. Overall, the Town Centre Zone is of a larger scale and has a wider focus than the Local Centre Zone while not undermining the primary function of the City Centre Zone" Given the distance of some 6.1km between Silverstream and the City Centre, this clause is nonsensical and should be removed. All my other comments regarding Commercial reality and anti-competitive restraint of trade provisions apply. This Centre certainly falls within the High Density catchment surrounding Silverstream station, so which set of rules apply when there is a conflict.
S5.31	TCZ-Town Centre zone policies and rules	Seek amendment	Remove city centre zone clauses from TCZ policies and rules.	TCZ-P3 Other activities "Only allow for other activities, including larger scale activities, where: (5) The location of the activity in the Town Centre Zone does not undermine the role and function of the City Centre Zone."

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>This anti competition rule should be removed.</p> <p>TCZ-R1 Buildings and structures, including additions and alterations "2. Activity status: Restricted discretionary 7. The potential of the size and scale of the building to undermine the role and function of the City Centre Zone" Remove clause 7.</p> <p>TCZ-R5 Commercial Service Activity "2. Activity status: Restricted discretionary 4. The potential of the location of the activity in the Town Centre Zone to undermine the role and function of the City Centre Zone." Remove clause 4.</p> <p>TCZ-R6 Food and Beverage Activity As above – remove City Centre Zone clause.</p> <p>TCZ-R7 Community Facility As above – remove City Centre Zone clause.</p> <p>TCZ-R8 Healthcare Activity As above – remove City Centre Zone clause.</p> <p>TCZ-R9 Educational Facility As above – remove City Centre Zone clause.</p> <p>TCZ-R10 Office activity As above – remove City Centre Zone clause.</p> <p>TCZ-R11 Visitor Accommodation As above – remove City Centre Zone clause.</p> <p>TCZ-R13 Supermarket As above – remove City Centre Zone clause.</p>
S5.32	SAZ-P6	Seek amendment	Remove the paragraph from SAZ-P6 "it is council's view... anywhere in Upper Hutt City"	SAZ-P6 "It is Council's view that the adverse effects of these fortifications on the environment, in particular in respect of the social, economic, aesthetic and cultural conditions of the Upper Hutt people and community, and the amenity values of the Upper Hutt environment, are such that these

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				<p>activities should not be permitted. The activity is therefore prohibited anywhere in Upper Hutt City."</p> <p>This paragraph relates to Gang Fortifications. All other references have been deleted from the document and it would appear that this paragraph should also be removed.</p>
Submitter 6: Darren Walton				
S6.1	Not stated	Seek amendment	<p>Please reinstate the Conservation Precinct in the small but significant areas in which they previously applied and give a proper account for the rules of Intensification Planning regarding the character, heritage, special status, and ecological significance of those areas.</p>	<p>In regard to the Conservation precincts. You have also included (p.171): Should there be any conflict between the High-Density Residential Zone and the General Residential Zone provisions, the provisions of the High-Density Residential Zone prevail.</p> <p>You plan to remove the Conservation Precinct (pp.168) but have maintained it on p.22. The section now simply eliminated is: Within the General Residential Zone of the City are environments with special character.</p> <p>The Residential Conservation Precinct includes the areas adjoining Trentham Memorial Park, Palfrey Street, Chatsworth Road and parts of Pinehaven with a mature landscape and townscape, contain native flora and fauna, natural watercourses, as well as larger sections. These areas require a lower density of development in order to maintain their important landscape and ecological values.</p> <p>The new rules may destroy the character of the areas you have sought to protect previously.</p> <p>The area is especially the habitat of Tui, Ruru, Kereru, Korimako and Piwakawaka because the conservation protections have maintained areas in which they breed.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>Allowing the densification of these areas (without regard to their previous status) is wrong in principle.</p> <p>Evidence of appropriate legal mechanism(s) to ensure that land is maintained in Māori ownership.</p>
Submitter 7: Jo Coffey				
S7.1	Not stated	Oppose	<p>More tree protection in Trentham. General residential zone at entrance to Upper Hutt on river side of Fergusson Drive not just orange on some map. Limit to height of high rises in main city. It is not Wellington city it is a small city.</p>	<p>Trentham is a very green leafy suburb, trees over 12metres especially natives were historically protected, instead of just a map, more protection for trees needs to be given in the Trentham area.</p> <p>Three story is ok as long as light planes are still adhered to; no building consents is nonsense we all need sunlight. Height restrictions on high rises in the city centre should be given as it is as all city with mountain views. This should not be unlimited totally.</p> <p>UHHC doesn't need to do everything the Government dictates we pay rates to our local council to look after our city. The area at the entrance of UH on the river side of Fergusson Drive should not be high density.</p> <p>(What are you doing about the unsightly graffiti on the building at the entrance to UH as it is).</p> <p>I also do not support 3 waters planning.</p>
Submitter 8: Fiona Daniel				
S8.1	Papakāinga chapter	Not stated	Adoption of a Papakāinga Provision within the District Plan	The council should be committed to providing a section specifically for papakāinga developments on ancestral Māori land, as part of the proposed district plan.

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				<p>The provisions should reflect this commitment by providing a permitted activity status for papakāinga developments on Māori freehold land, provided that it can be demonstrated that the land has the capacity to cater for the development and that certain amenity standards are met.</p> <p>A restricted discretionary activity status should also be applied for “General land owned by Māori” that is either the subject of proceedings before the Māori Land Court to convert it to Māori freehold land, or where an ancestral link has been identified. On all other land, papakāinga developments should be adopted as non-complying activities.</p>
Submitter 9: Sarah				
S9.1	Not stated	Oppose	Oppose Intensification Planning Instrument	<p>Oppose, the suburbs near the train station will become rental slums with a minimum of 6 storey rental apartments and houses will be sold to developers.</p> <p>Walking to the train from my house 2 minutes away will become unsafe, the home ownership rates will decline and socio-economic nature of the area will decline.</p> <p>I think areas like Lower Hutt should be expanded.</p>
Submitter 10: Jonathan				
S10.1	Not stated	Oppose	Reject this proposal	<p>We should not be building apartment buildings close to the railway station or anywhere really in Upper Hutt or they will become low income, gang dominated, crime centres and it will be dangerous to walk past them on the way to the railway station.</p> <p>Upper Hutt is a long way from Wellington centre city and apartment buildings should be down town wellington or a</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>short commute to downtown Wellington so that young professionals live in them.</p> <p>Upper Hutt if it wishes to grow should open up lots for sale to developers north of Upper Hutt towards Te Marua Golf course for regular one level houses to be built.</p> <p>Upper Hutt is the suburbs, and we should keep it that way and let places to closer to downtown have high density Apartment buildings.</p>
Submitter 11: Russell Browning				
S11.1	Not stated	Oppose	Include in scope of the planning instrument, regard for all aspects of population growth not just property, which includes all aspects of living.	<p>Having no upper limit on CBD buildings seems stupid and asking for abuse.</p> <p>Increasing density will change the location density of students and families so will they be able to access the facilities that exist today and in the future? By your own Cost Benefit Analysis congestion will increase and air and water quality will decrease - given you have signs on parks claiming how good Upper Hutt air is, and poor air quality literally kills New Zealanders each year; are you sure this is the policy direction you wish to pursue?</p> <p>I would like recognition in the IPI that as you increase population, by 50% according to your own information, you must also account for increases to public services - specifically schools, hospitals, train services and green space/playgrounds - i.e. land. A 50% increase in population could justify an additional intermediate and high school (for example), and the land for this would need to be reserved before it all becomes housing.</p>
Submitter 12: James Bade				
S12.1	High Density Zone	Support and seek amendment	Exempt the area bounded by Benzie Ave, Palfrey St, Brown St and Martin St from high	I think the delineation of the High Density Residential Zone and the General Residential Zone is appropriate.

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			density housing to protect the heritage of that area and maintain it as a key pleasant residential area close to the CBD.	My only reservation concerns the area bounded by Benzie Ave, Palfrey St, Brown St and Martin St, which has high heritage associations and needs to be protected from high density housing.
Submitter 13: Murray Cope				
S13.1	Not stated	Oppose	No to multi story dwellings in existing residential areas	I object to multi story dwellings in existing residential areas - these will destroy what has taken years to achieve which is quality residential housing, who wants shading / loss of privacy / additional noise & traffic, in planning for the future we should not destroy what we already have and what current residents enjoy.
Submitter 14: Duncan Cameron				
S14.1	High Density Zone	Oppose	Revise the proposed high density planning extent with a logical layout around the CBD and regional shopping centres only.	<p>The MDRS allowances are appropriate for achieving this within sites, rather than sporadic huge height scale increases in areas wholly not appropriate.</p> <p>I oppose the proposed intensification designations as noted in the draft planning maps.</p> <p>The requirement for properties to be located within a 10min walk to railway stations is arbitrary in definition within the planning maps. Our property is located within this walking time frame to Heretaunga Station, but so are many others on the opposite side of Fergusson Drive, including the mayors property and those surrounding it on Golf Road (where no specific architectural character exists!). To exclude all properties to the western side of Fergusson Drive is non nonsensical in regard to the objectives of intensification, given all can achieve the required traverse to the station within the 10 time frame.</p>

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				<p>The proposal to allow for 20m high dwellings in locations away from shopping and education precincts and schools is also misguided. The proposal for up to six storey high buildings is not viable in regard to planning and growth, unless grouped to appropriate zoning.</p> <p>All planning designations be revisited, and all high density areas are positioned in locations that actually make sense, where a progression of height is grouped towards the centre of the city. Elsewhere the intensity benefits of the MDRS provide increased accommodation adjacent to railway stations as an instrument for intensification.</p> <p>All high density areas should be immediately grouped around the CBD and localised shopping precincts such as Silverstream.</p> <p>Density can be achieved without excessive height in suburban areas.</p> <p>Locate these potential taller buildings in sensible places!!!</p> <p>The removal of parking requirements promotes the usage of public transport, but occupants are not going to travel for one stop with groceries etc and walking from the closest shopping zones is prohibitive. Large groups of people concentrated (in apartment blocks) in areas where the only local facility is a railway station provides no benefit.</p>
Submitter 15: Debbie Hawinkels				
S15.1	Entire IPI	Oppose	To seek further public consultation as well as other urban planning ideas to retain Upper Hutt and its character - not just mass urban precincts.	The central city area needs planning and future proofing to ensure Upper Hutt remains a vibrant place where people want to live, not concrete jungles of high rise living!!

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				<p>I oppose more Urban Precincts covering Upper Hutt. We refrain from creating urban precincts throughout Upper Hutt which are devoid of character, most notably in reference to the following:</p> <ul style="list-style-type: none"> - St Patrick's Urban Precinct - St Patrick's College Precinct <p>I see the Urban Precincts in Wallaceville Estate and would hate to see more of these areas littered through Upper Hutt</p> <p>Please can we retain the character while planning for more housing, as well as proper planning for infrastructure to cater for the increased population which Upper Hutt is expected to reach.</p>
Submitter 16: Peri Zee				
S16.1	Entire IPI	Oppose	Additional land should be up zoned for retail/mixed use in the northern suburbs described above to provide necessary services (small supermarkets, pharmacy, GP, community centres etc) and to create identifiable centres within walking /biking distance to people's homes.	<p>Lack of neighbourhood centre/local centre zoned land in the northern suburbs of Upper Hutt. In the northern suburbs of Upper Hutt (including Maoribank, Timberlea, Brown Owl, Emerald Hill, Birchville, Te Marua and Plateau) There is no identifiable neighbourhood centre in any of these suburbs. In the northern suburbs of Upper Hutt (including Maoribank, Timberlea, Brown Owl, Emerald Hill, Birchville, Te Marua and Plateau) the proposed provision of retail/commercial zoned land is very limited. Servicing all of these suburbs there is currently only a bottle store/gaming lounge, petrol station, fish and chip shop and two dairies.</p> <p>The proposed zone changes do not appear to provide for any additional accessibility for all people between housing, jobs and community services by active transport that support a reduction in greenhouse gases (as required to be a well-functioning urban environment).</p>

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				In the northern suburbs of Upper Hutt, People living in these suburbs (many being the most disadvantaged) have to travel long distances to obtain basic services.
Submitter 17: Adam Ricketts				
S17.1	Entire IPI	Oppose	Resist and delay the government directives for as long as possible. The government is powerless without the councils. If all councils refused, the government would have to abort this lunacy.	<p>The proposed district plan unilaterally specifies 3 houses for most existing sections (area of the section not specified) up to 3 storeys high (height not specified) it also removes the Special Residential, Historic and General Residential Activity existing zoning. In the proposed new Medium Density existing suburban areas, up to 6 storey buildings with no specifics on garages, parking spaces, charging spaces and garden/green areas are approved.</p> <p>High density new developments are already well underway in Upper Hutt. This should not be allowed in current 1-2 storey areas as it completely overwhelms the existing Lower Density housing areas and if allowed will cause a domino effect and the destruction of the original character of the areas and the reason for people choosing to live there.</p> <p>I oppose the intensification of the rail corridor in particular, and all intensification of urban areas in general. To date development of existing urban areas has been in the main gradual, organic and mindful of the existing lifestyles of the residents, owners, and landlords of the properties. It has also sought to protect the environment, the quality of life and the lifestyle choice of the owners and landlords of the properties by protecting their interests, and therefore the inherent value of those properties. At a stroke, the new plan condemns large areas of many existing suburbs and urban areas to a level of intensification which will, over a relatively short period of time, change the nature and style of living beyond our recognition. It will cancel the KIWI way of life</p>

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				<p>that most New Zealanders have lived through or emigrated to New Zealand to enjoy. It will result in the wholesale destruction of many of our existing houses in favour of high and medium density houses with no protection for the present and still prevalent, but fast disappearing, lower density style of properties. It is obvious to me, and I am sure many others, that this ill-conceived panic reaction to a housing shortage is a recipe for social and infrastructure failure in the not too distant future. At a stroke condemning the last 200 years of urbanisation to landfill (demolishing existing homes) and packing people into small areas with no space for vehicles (driveway, garages charging options for EV's where people live, let alone somewhere for children to play), is nothing short of extreme short sightedness; bordering on lunacy.</p> <p>It is important to note that until now the government has made it possible for councils to manage local infrastructure without a directive from central government dictating how people should be forced to live.</p> <p>Where is democratic choice and consultation with the public and, I might add, voters? Is there any true intention of getting the public's opinion and approval for any of these changes to ensure it is for the common good and a meaningful improvement to the lives and wellbeing of the current rate payers? Or is it a politically driven, irresponsible knee-jerk reaction to over-rated concerns in New Zealand?</p> <p>This proposal/directive has been issued with next to no public discussion before being issued for local councils to implement. Councils and local area representatives have had next to no input and discussion on this irreversible, ill-conceived, ill considered, arrogant attack on 200 years of</p>

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				<p>town and city development. Bearing in mind that the majority of Hutt Valley residents, and I am sure most suburban residents in NZ, are strongly against this government directive.</p> <p>Please summon the courage to question and refuse to meekly accept this affront to our freedom to self-determine what we all would like to protect: our kiwi way of life. Please follow the examples of Christchurch and parts of Auckland who refuse to blindly accept this DECREE from Central Government.</p>
Submitter 18: Teresa Homan				
S18.1	Entire IPI	Oppose	I request either advocating a repeal of the RMA legislation to central government. Or an expanded district plan that takes into account the unnecessary concentration of intensified housing near rail.	<p>I believe there needs to be consent sort for the building of three story or higher apartment style housing that fits with a housing plan driven by local council.</p> <p>I also believe that the requirement to intensify housing in areas close to rail is a misnomer. Public transport in the nature of buses and trains are and can be provided across the region and if this is taken into account intensified housing could be spread across the Upper Hutt district rather than concentrated in specific areas leaving more scope for green space and playgrounds.</p> <p>I oppose the plan change in that it is not driven by local government but by central government. It should be amended in its entirety and put back in the hands of local government informed by local residents and interested groups.</p>
Submitter 19: Serge Ritossa				
S19.1	High Density Zone	Oppose	I oppose High Density Residential Zones being applied in and around Upper Hutt and	I oppose High Density Residential Zones being applied in and around Upper Hutt and would like Council to revert to the

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			<p>would like Council to revert to the MDRZ zone as it relates to my area in and around Seddon Street.</p>	<p>MDRZ zone as it relates to my area in and around Seddon Street.</p> <p>I live in 26 Seddon Street and will be directly impacted. The reason I choose to live here because it is a traditional suburb and not an overcrowded high rise city centre. I have planted many native trees on my section to help with carbon emissions and enhance the native flora and fauna.</p> <p>I oppose the lack of foresight in proposing to foster the slums of the future. Cities are struggling with congestion because of concentrated buildings and dwellings and here you are trying to implement the same environment. Have you learnt nothing? I oppose the fact that a scumbag developer could come in and build 3 x 3 on all sides of my property locking me into a prison with no sun. So where is the concern for people's wellbeing and the community now?</p> <p>I am concerned with the additional traffic and parking in the area. There are two nearby schools with kids and mums and dads walking to school which the additional road and residential driveway traffic will increase the safety of those people. I am opposed to the fact that roadside parking will be at a premium and create tension with existing dwellings and their families.</p> <p>The existing services in the street were not originally designed for high density dwellings can the council explain how they intend to upgrade services such as water, sewerage, power, mobile phone congestion, and fix the potholes as more traffic means more wear on the streets. What is the plan for summer with water services unable to cope with existing demand and now this proposal to introduce high density housing is just madness.</p>

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Submitter 20: Andrew Knight				
S20.1	GRZ- General Residential zone	Oppose	Allow three dwellings - each up to TWO storeys - on each site in the residential zone without needing resource consent.	<p>Oppose being able to build dwellings of three storeys without a resource consent.</p> <p>I oppose being able to build dwellings of three storeys without resource consent in a residential zone.</p>
Submitter 21: Lorraine Pells				
S21.1	Entire IPI	Oppose	<p>Our local authority needs to better represent the rate payers and residents. There are areas of the country that will not slavishly allow the lives of the local residents to be damaged from unsuitable development and inappropriate development. I believe Christchurch is looking closely at this. I want our local representatives to look after our quality of life better and moderate this so that it enhances our lives and doesn't make living in the Valley a lowered compromise of quality and environment for all.</p>	<p>Residential zones around the CBD are going to need to accommodate more people long term - that is not in dispute. But the scale and likely quality of the proposals is alarming in terms of the amenity that is currently enjoyed by residents in the Upper Hutt area.</p> <p>Six story high blocks will in my view damage the quality of life in the Valley long term. To maintain the lifestyle that current residents enjoy, and future residents should be able to look forward to, the Upper Hutt City Council should be forward enough looking and progressive enough to keep the new developments to no more than two or three stories high. Spreading the development over a wider area with lower height density done well would enhance the environment/amenity for more residents.</p> <p>Six story high blocks will in my view damage the quality of life in the Valley long term. These should be limited to no more than two or three stories high.</p>
Submitter 22: Stephen Bell				
S22.1	Entire IPI	Oppose	Reject these changes, and develop an intensification profile more in keeping with our current character; ensuring effective managing of our water supply, stormwater,	I also believe the height allowance of 10 storeys in the proposed High-Density Zone is also excessive – no new buildings should be higher than Astral Towers to help maintain the character of the area. Relatively low level

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			wastewater; controlling noise; providing adequate residential parking and maintaining the current character of existing Upper Hutt suburbs	<p>combined residential/commercial development of up to 5 storeys is popular in the UK, except over taverns, and could be used here! Inappropriate zoning</p> <p>Drinking Water: Upper Hutt suffers a water supply restriction every year – the population increase proposed will significantly exacerbate the situation.</p> <p>Noise: Some areas in Auckland have been experiencing excessive noise issues with infill. Commonly these problems relate to location of external heat-pump units adjacent neighbours bedroom windows. In addition, I have personally investigated a number of noise complaints in closely located properties where general living noise, for example people chatting on their deck; and radio noise have led to ongoing complaints with no easy solutions.</p> <p>I believe the significant changes in this proposal are a bonus for developers but a liability on existing residents and ratepayers and therefore Oppose the current proposal. Council needs to grow some balls and take the same action as Christchurch and reject these changes and develop an intensification profile more in keeping with our current character; effectively managing water supply, stormwater, wastewater; controlling noise; providing adequate residential parking and maintaining the current character of existing Upper Hutt suburbs.</p>
Submitter 23: Brad M (surname not supplied)				
S23.1	Entire IPI	Support	Please don't let the already-rich NIMBY's ruin things for the rest of us.	<p>I support the proposed IPI.</p> <p>Even though I'm sure a few homeowners will complain loudly, I think a majority of Upper Hutt residents would likewise generally agree and support the proposed IPI.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>The upset people are always much more likely to make their voices heard, and I just want to counterbalance that a bit.</p> <p>There is a generation of homeowners who have seen their own property values skyrocket to dizzying heights in just a few years. The "haves" have gained extraordinary wealth at the expense of the "have-nots" (i.e., the renters / would-be-first homebuyers). Meanwhile, we have record waiting lists for social housing and unprecedented numbers of families who are sleeping in their cars because there are exactly zero places that they can afford to live.</p> <p>We have massive, systemic issues with zoning / housing / infrastructure in the Hutt Valley (just as in the rest of NZ), and this plan looks prima facie to be a big step in the right direction. Please don't let the already-rich NIMBY's ruin things for the rest of us.</p>
Submitter 24: Graham Bellamy				
S24.1	Not Stated	Not Stated	Lower limit on housing intensification i.e., 2 storey max on residential housing	<p>What about impacts on infrastructure, carparking on streets, rubbish</p> <p>Do Upper Hutt residents really want their communities to grow by the numbers shown in the IPI documents - Have they been asked, other than by this submission process?</p> <p>Do they really want to live next to 6 storey buildings and lose sun, light and privacy?</p> <p>What about impacts to our local environment e.g., river and parks?</p>

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Submitter 25: Anthony and Kaye Swanson				
S25.1	Not Stated	Not Stated	<p>Common sense and recognition of the current ratepayer's equity in their properties in addition to recognising the character of the area.</p> <p>Services, especially emergency would be compromised.</p>	<p>In Upper Hutt, two storey developments with off road parking would adequately spread the required intensification whilst recognising the need for servicing proposed residents and retain shared space and roading for all residents.</p> <p>RE: 16 Joseph Grove - This grove is not suitable for intensification. The small grove is an under width street with limited parking. Regular services such as rubbish collections are already under pressure. Trucks and heavy vehicles have to make three point turns as it is. If cars are parked at the end, it is impossible or extremely difficult. Ambulance or fire access also bad.</p>
Submitter 26: Marian and Dennis Cole				
S26.1	Entire IPI	Seek amendment	<p>We seek greater clarity in the document and the need to consult with neighbours and others immediately effected in all high density developments. It seems that we are excluded from doing so at present.</p>	<p>We are not averse to proposed medium to high density of housing.</p> <p>Amendments to these could be considered in the following ways: SUB - RES - P9, SUB - HRZ - P3 relating to "District Wide Matters" - these need more consultation around: - notable trees - urban tree groups - eco-systems - indigenous bio-diversity - natural features and landscapes. Developments in the new high density subdivision areas need to identify these features and consult with local communities (in particular neighbours) before detailed planning for the development commences. It would seem that the community will not be consulted and that is unacceptable to those of us that are affected by this.</p> <p>SUB - HRZ - S2, SUB - GEN - P13, SUB - GEN - R2A We cannot see how hydraulic neutrality can be achieved in high</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>residential zones without the use of permeable surfaces around every development. These surfaces should apply eventually to all city roading and paving.</p> <p>SUB - HRZ - P6 What is "good planning" with respect to high density developments? The documents mention "sustainability and land coverage" but there are no details. Does sustainability include solar cells, grey water storage, permeable surfaces for driveways and paving? These should be mandatory either now or in the near future. There is simply not enough on the effects of climate change on citywide developments.</p> <p>We do not wish to see the continuation of developments such as recently completed in Silverstream beside the shopping area. This development comprises four single story conventional houses on a quarter acre section. With the driveways, this will take up most of the land area and not lead to hydraulic neutrality.</p> <p>The above is simply an example of poor design and land use.</p>
Submitter 27: Transpower New Zealand Limited				
S27.1	Entire IPI	Support and seek amendment	Revise the corridor provisions to reflect Transpower's current, nationally consistent, engineering based approach to managing effects on the National Grid and giving effect to the NPSET.	<p>In respect of the proposed IPI, providing for greater urban densities in the vicinity of the National Grid has the potential to significantly impact Transpower's ability to operate, maintain, upgrade, and develop the National Grid.</p> <p>The Proposed IPI addresses potential impacts on the National Grid through provisions in the District Plan that establish setbacks from transmission lines. While Transpower generally supports this approach, the provisions do not reflect the current policy and rule approach promulgated by</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				Transpower. Noting that Plan Change 32, which was to give effect to the NPSET, was made operative in 2012.
S27.2	Entire IPI	Seek amendment	Seek amendments to the IPI to ensure that the provisions do not compromise the National Grid.	<p>Policies 10 and 11 of the NPSET provide the primary direction on the management of adverse effects of subdivision, land use and development activities on the transmission network.</p> <p>Similarly, the Operative Wellington Regional Policy Statement (“RPS”), and Proposed Plan Change 1 to the RPS includes policies that direct the protection of regionally significant infrastructure (including through buffer corridors).</p> <p>Together, these policies are critical matters for a district plan to address and are of specific relevance to Transpower’s submission on the Proposed IPI given their clear direction that development does not compromise the National Grid.</p>
S27.3	Entire IPI	Support and seek amendment	Seek limited amendments to refine the IPI’s approach to embedding qualifying matters.	Acknowledges the purpose of the IPI and the submission generally supports the proposed provisions and particularly supports the identification of the National Grid as an existing qualifying matter in the Proposed IPI. Acknowledge that the Section 32 Reports, and particularly the ‘Section 32 Evaluation Report - Volume 4: Qualifying Matters’ identifies the NPSET as being relevant to the Proposed IPI and confirms that the National Grid is an existing qualifying matter. Subject to the relief sought elsewhere in this submission, Transpower generally supports the various Section 32 Reports, including the ‘Section 32 Evaluation Report - Volume 4: Qualifying Matters’, to the extent that the Reports identifies the National Grid as an existing qualifying matter.
S27.4	Entire IPI	Support and seek amendment	Retain or amend the provisions of the Proposed Plan Change to give effect to the NPSET and RPS, and achieve the purpose of	The corridor-based approach to the National Grid protects the safe and efficient operation of the National Grid by: • ensuring sensitive activities such as residential development

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>the RMA as set out in Appendix C (detailed submission points) including such further alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.</p>	<p>will generally not be provided for in close proximity to transmission lines.</p> <ul style="list-style-type: none"> • partially minimising the risk of inadvertent contact with transmission lines including the risk of flashovers; • helping reduce nuisance impacts on landowners and subsequent complaints. • partially protecting transmission lines from activities and development that could have direct or indirect effects on them; • partially protecting access to the National Grid by ensuring development activities cannot occur close to the National Grid and prevent Transpower’s access to it; and • partially enabling efficient and safe operation, maintenance, upgrade and development of the transmission lines. <p>Amendments to the Proposed IPI are necessary to:</p> <ul style="list-style-type: none"> • provide greater clarity for plan users. • give effect to Policies 1, 2, 10 and 11 of the NPSET. • give effect to Policy 3 and Policy 4 of the NPS-UD. • give effect to the RPS, and particularly Policy 8. • meet the requirements of section 32, 62 and 75 of the RMA (as relevant); and therefore • achieve the purpose of the RMA.
S27.5	Definitions	Support	Retain definition as of MDRS as notified	Support the inclusion of a definition of “Medium Density Residential Standards (MDRS)’ in the Proposed IPI on the basis that the definition provides clarity, assists plan users, and is consistent with, through reference to, Schedule 3A of the RMA
S27.6	Definitions	Support	Retain definition of qualifying matter as notified	Support the inclusion of a definition of ‘Qualifying matter’ in the Proposed IPI on the basis that the definition provides

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				clarity, assists plan users, and is consistent with the definition in sections 77I and 77O of the RMA.
S27.7	Definitions	Support	Retain definition of qualifying matter area as notified	Support the inclusion of a definition of 'Qualifying matter Area' on the basis that the definition includes: - in clause (n), "the areas within 20 metres of a high voltage (110kV or greater) electricity transmission line"; and - in clause (o), "the areas within 12-32m of a high voltage (110kV or greater) electricity transmission line".
S27.8	Definitions	Support	Retain definition of reverse sensitivity as notified	Support the definition of 'Reverse sensitivity' on the basis that the definition is not inconsistent with the management of effects of, and on, the National Grid in Policies 10 and 11 of the NPSET.
S27.9	Objective UFD-01	Support	Retain objective UFD-01 as notified	Support proposed Objective UFD-O1, and particularly the inclusion of reference to people and communities' health, safety and wellbeing. Transpower
S27.10	Objective UFD-02	Support	Retain objective UFD-02 as notified	Support proposed Objective UFD-O2 and acknowledges that the Objective reflects the requirement of Schedule 3A Part 1(6)(1) of the RMA.
S27.11	Objective UFD-04	Support	Retain objective UFD-04 as notified	Support proposed Objective UFD-O4, and particularly the inclusion of reference to the following continuing to be provided for as qualifying matters: - "give effect to national policy statements"; and - "ensure the safe and efficient operation of nationally significant infrastructure". Such an approach gives effect to Policy 4 of the NPS-UD and, as the proposed Objective relates to the National Grid, Policies 10 and 11 of the NPSET.
S27.12	Policy UFD-P2	Support	Retain policy UFD-P2 as notified	Support proposed Policy UFD-P2 on the basis that the Policy provides clear direction that the intensification sought by the

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				Policy is qualified by the following “while avoiding inappropriate location, heights and densities of buildings and development within qualifying matter areas as specified by the relevant qualifying matter area provisions.” Such an approach gives effect to Policy 4 of the NPS-UD and, as the proposed Policy relates to the National Grid, Policies 10 and 11 of the NPSET.
S27.13	Strategic Direction	Support	Retain the additional text in respect of existing qualifying matter areas in the existing Strategic Direction.	Support the amendment to the existing Strategic Direction because the amendment appropriately recognised the relationship of qualifying matters to the extent of development through the inclusion of “... existing qualifying matter areas may limit the amount of permitted medium density development possible on an allotment.”
S27.14	Objective CMU-01	Support	Retain objective CMU-01 as notified.	Support proposed Objective CMU-01, and particularly the inclusion of reference to people and communities’ health, safety, and wellbeing. Transpower acknowledges that the Objective reflects the objective in Schedule 3A Part 1(6)(1) of the RMA.
S27.15	objective SUB-RES-02	Support	Retain objective SUB-RES-02 as notified.	Support proposed Objective SUB-RES-02, and particularly the inclusion of reference to people and communities’ health, safety, and wellbeing. Transpower acknowledges that the Objective reflects the objective in Schedule 3A Part 1(6)(1) of the RMA.
S27.16	Policy SUB-RES-P6	Support and seek amendment	Amend policy SUB-RES-P6 to read: To provide for medium density housing within the General Residential Zone while: (a) encouraging the consideration of the protection and retention of indigenous biodiversity values within the Indigenous Biodiversity Precinct. <u>and</u>	Support the amendments proposed to Policy SUB-RES-P6 to the extent that the Policy recognises that the General Residential Zone provides for medium density housing. However, Transpower considers that this Policy also needs to recognise that existing qualifying matters may constrain development and increased density. Transpower seeks a

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<u>(b) recognising that some parts of the Zone contain qualifying matters that may modify or limit the density or height of development. ...</u>	limited amendment to achieve this and to therefore give effect to Policy 4 of the NPS-UD.
S27.17	District-wide matters table	Support and seek amendment	Amend the District-wide table as follows: "District-wide matters Subdivision within the General Residential Zone must comply will all relevant rules and standards: (a) that relate to qualifying matter areas; (b) that are in the district-wide matters and qualifying matter areas of the Plan as listed below: ..."	Support the inclusion of a new District-wide matters table and the reference to qualifying matter areas but considers that the table appears to refer to qualifying matter areas that are listed in the table. If understood in this way, the provision would not apply to the electricity transmission line setbacks that are qualifying matters. Transpower seeks a minor amendment to provide for the intended outcome more clearly
S27.18	Rules SUB-RES-7, SUB-RES-R6, SUB-RES-R8, SUB-RES-R9 and SUB-RES-R10	Support	Retain the cross references to Rule SUB-RES-7 in Rules SUB-RES-R6, SUB-RES-R8, SUB-RES-R9, SUB-RES-R10 as notified.	Support the amendments proposed to Rules SUB-RES-R6, SUB-RES-R8, SUB-RES-R9 and SUB-RES-R10 to insert a clear cross reference to Rule SUB-RES-R7 applying to subdivision within an 'Electricity Transmission Corridor'. Transpower notes this replicates the cross reference in Rule SUB-RES-R2 that is retained in the Proposed IPI.
27.19	District-wide matters table	Support and seek amendment	Amend the District-wide table as follows: "District-wide matters Subdivision within the Commercial and Mixed Use Zone must comply with all relevant rules and standards: (a) that relate to qualifying matter areas; <u>(b) that are in the district-wide matters and qualifying matter areas of the Plan as listed below: ...</u>	Support the inclusion of a new District-wide matters table and the reference to qualifying matter areas but considers that the table appears to refer to qualifying matter areas that are listed in the table. If understood in this way, the provision would not apply to the electricity transmission line setbacks that are qualifying matters. Transpower seeks a minor amendment to more clearly provide for the intended outcome
S27.20	Rule SUB-CMU-R5	Support	Retain rule SUB-CMU-R5 as notified.	Generally support the replication of Rule SUB-RES-R7 in SUB-CMU-R5 the Proposed IPI so that the same provisions apply in the new Zone.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
27.21	Rules PK-R1, PK-R2 and PK-R3	Support and seek amendment	Amend Rule PK-R1, PK-R2 and PK-R3 as follows: “ 1. Activity Status: Permitted Where a. Any building must comply with the relevant zone standards for building height, height in relation to boundary, yard setbacks and building coverage where specified in the relevant zone chapter. <u>... x) Any building or structure must comply with the relevant zone standard and associated activity status that applies where development is in the vicinity of high voltage (110 kV or greater) electricity transmission lines.</u>	Generally support Rules PK-R1, PK-R2 and PK-R3 to the extent that the rules include a cross reference to relevant setbacks that apply in each zone. Transpower does not consider that the rule is clear in respect of the way in which setbacks from transmission lines may apply to papakāinga (that are considered sensitive activities under Policy 11 of the NPSET). To clearly apply the appropriate rule and activity status to these provisions, Transpower seeks the addition of a further clause in the Rules.
S27.22	GRZ-General Residential Zone	Support and seek amendment	Amend the third sentence of the ‘Background’ as follows: “A mix of housing densities are provided for, with medium density housing enabled across the General Residential Zone by the incorporation of the Medium Density Residential Standards. <u>It is recognised that there are parts of the Zone where the permitted development height and density may be modified or limited by qualifying matters.</u>	Generally support proposed amendments to the General Residential Zone ‘Background’ text but considers that the introduction would benefit from the inclusion of reference to the constraints imposed by qualifying matters, such as the National Grid. Transpower seeks the inclusion of a further clause to address this.
S27.23	Objective GRZ-O2	Support	Retain Objective GRZ-O2 as notified.	Support proposed Objective GRZ-O2, and particularly the inclusion of reference to people and communities’ health, safety, and wellbeing. Transpower acknowledges that the Objective reflects the requirement of Schedule 3A Part 1(6)(1) of the RMA.
S27.24	Objective GRZ-O3	Support	Retain Objective GRZ-O3 as notified.	Support proposed Objective GRZ-O3 and acknowledges that the Objective reflects the requirement of Schedule 3A Part 1(6)(1) of the RMA

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S27.25	Policy GRZ-P1A	Support and seek amendment	Amend Policy GRZ-P1A as follows: “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>while avoiding inappropriate locations, heights and densities of buildings and development within qualifying matter areas as specified by the relevant qualifying area provisions.</u> ”	Within the General Residential Zone, qualifying matter areas may limit the amount of permitted medium density development possible on an allotment. While the policy directive within Policy GRZ-P1A is supported (and reflects Schedule 3A, Part 1, clause (6)(2)(a) of the RMA), Transpower supports reference to qualifying matter areas as they directly influence the capacity for intensification and residential development.
27.26	Policy GRZ-P1B	Support	Retain Policy GRZ-P1B as notified.	Support GRZ-P1B (noting it reflects that required under Schedule 3A Part 1(6)(2) of the RMA) on the basis that it recognises qualifying matters.
S27.27	GRZ-General Residential Zone rules	Oppose	Amend the General Residential Zone rules to include a new <u>District-wide table rule that states the following: “District-wide matters Each activity in the General Residential Zone must comply with all relevant rules and standards that relate to qualifying matter areas.”</u>	Oppose the Proposed IPI on the basis that, while identified as a qualifying matter the amended provisions do not explicitly include the restrictions that relate to structures and activities in the vicinity of electricity transmission lines in the IPI provisions or maps. To ensure that it is explicitly clear to plan users that the National Grid setbacks are qualifying matters, Transpower seeks the explicit reference be included in the Proposed IPI in a similar manner as addressed in the High Density Residential Zone and for subdivisions.
S27.28	Rules GRZ-PREC1-R1, GRZ-PREC1-R3, GRZ-PREC1-R4 and GRZ-PREC1-R6	Support	Retain Rule GRZ-PREC1-R1, Rule GRZ-PREC1-R3, Rule GRZ-PREC1-R4 and Rule GRZ-PREC1-R6 as notified.	Support the Rules that apply in Precinct 1 (Indigenous Biodiversity) to the extent that the Rules explicitly provide for the rules in the underlying zone to also apply.
S27.29	NCZ-Neighbourhood Centre Zone	Support	Retain the direction in respect of qualifying matter areas included in the new Advice Note.	Support the following text included in the new Rules Advice Note on the basis that the rule confirms that rules relating to electricity transmission line setbacks will apply to the site that

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
	Rules Advice Note			is in the Neighbourhood Centre Zone and traversed by the National Grid: "Each activity in the Neighbourhood Centre Zone shall comply with the relevant qualifying matter areas and permitted activity standards in the district-wide matters of the Plan as listed below."
S27.30	NCZ-SSC-S1	Support and seek Amendment	Amend NCZ-SSC-S1(1)(c) as follows: "c. Minimum <u>sensitive activity</u> , building <u>and structure</u> setback from the power pylon and electricity transmission lines on the site... "	<p>(Aerial photo provided) Acknowledge that the one site in the Neighbourhood Centre Zone that is traversed by the National Grid is managed by 'Site Specific Controls'.</p> <p>Support the identification of the site through the inclusion of the following aerial photograph. Also support the inclusion of a setback distance in the Standards for buildings from the transmission line and support structure.</p> <p>That said, Transpower seeks limited amendments to the Standard to better align with Transpower's current, nationally consistent, approach to the management of activities near the National Grid to give effect to Policies 10 and 11 of the NPSET.</p>
S27.31	Entire IPI	Seek amendment	Seek that the provisions that manage effects on the National Grid that are proposed to reflect the National Grid as a qualifying matter are similarly extended to the new areas.	Seek that the provisions that manage effects on the National Grid that are proposed to reflect the National Grid as a qualifying matter are similarly extended to the new areas.
Submitter 28: Ara Poutama Aotearoa – Department of Corrections				
S28.1	Entire IPI	Support and seek amendment.	Seeks that intensive residential development is not enabled adjacent to Rimutaka Prison.	The Intensification Planning Instrument Plan Change provides for an appropriate spatial pattern of residential areas, but any intensive residential development should not be enabled adjacent to Rimutaka Prison due to potential operational security risks for the prison (e.g., contraband incursions).

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S28.2	Definitions	Oppose and seek amendment	<p>Add a new definition of “Household” as follows:</p> <p><u>Household: means a person or group of people who live together as a unit whether or not:</u></p> <p><u>a. any or all of them are members of the same family; or</u></p> <p><u>b. one or more members of the group (whether or not they are paid) provides day-to-day care, support and supervision to any other member(s) of the group.</u></p>	<p>The current definition of “Residential Unit” in the UHCDP aligns with the National Planning Standard and refers to a “Household” which is not defined in the UHCDP, nor the Intensification Planning Instrument Plan Change.</p> <p>Seek a new definition be added, to clarify that use of a residential unit by a household is not necessarily limited to a family unit or a flatting arrangement (which are more commonly perceived household situations). Ara Poutama provides residential activities offering housing, and associated care and support for people following their release.</p> <p>The addition of a definition of “Household” will enable Ara Poutama to implement residential activities with support, subject to an appropriate regulatory framework, within Upper Hutt City.</p>
S28.3	Objective UFD-O2	Support and seek amendment	<p>Amend Objective UFD-O2 as follows:</p> <p>UFD-O2 Relevant residential zones provide for a variety of housing types, <u>households</u>, and sizes that respond to:</p> <p>a. Housing needs and demands; and.....</p>	<p>Request objective UFD-O2 is retained but amended so that a variety of household types that meet the community’s diverse social and economic housing needs are provided for in residential zones, including households that involve an element of supervision, assistance, care and/or treatment support. This will help build resilient and strong communities and give effect to the RMA and NPS-UD.</p>
S28.4	Objective GRZ-O3	Support and seek amendment	<p>Amend Objective GRZ-O3 as follows: GRZ-O3 Housing Variety A relevant residential zone</p> <p><u>The general residential zone</u> provides for a variety of housing types, <u>households</u>, and sizes that respond to:</p> <p>a. Housing needs and demands; and</p> <p>b. The neighbourhood’s planned urban built character, including 3- storey buildings.</p>	<p>Request objective GRZ-O3 is retained but amended so that a variety of household types that meet the community’s diverse social and economic housing needs are provided for in residential zones, including households that involve an element of supervision, assistance, care and/or treatment support. This will help build resilient and strong communities and give effect to the RMA and NPS-UD.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S28.5	Policy GRZ-P1A	Support and seek amendment	Amend Policy GRZ-P1A as follows: GRZ-P1A Enable a variety of housing types <u>and households</u> with a mix of densities within the General Residential Zone, including 3-storey attached and detached dwellings, and low-rise apartments.	Request policy GRZ-P1A is retained but amended so that a variety of household types that meet the community's diverse social and economic housing needs are provided for in residential zones, including households that involve an element of supervision, assistance, care and/or treatment support. This will help build resilient and strong communities and give effect to the RMA and NPS-UD.
S28.6	Objective HRZ-O2	Support and seek amendment	Amend Objective HRZ-O2 as follows: HRZ-O2 Housing Variety A relevant residential zone <u>The high density residential zone</u> provides for a variety of housing types, <u>households</u> , and sizes that respond to a. Housing needs and demands; and b. The neighbourhood's planned urban built character, including 3-storey buildings.	Request objective HRZ-O2 is retained but amended so that a variety of household types that meet the community's diverse social and economic housing needs are provided for in residential zones, including households that involve an element of supervision, assistance, care and/or treatment support. This will help build resilient and strong communities and give effect to the RMA and NPS-UD.
S28.7	Policy HRZ-P9	Support and seek amendment	Add a new Policy HRZ-P9 as follows: HRZ-P9 Enable a variety of housing types and households with a mix of densities within the General Residential Zone, including 3-storey attached and detached dwellings, and low-rise apartments.	Request addition of new policy HRZ-P9 so that a variety of household types that meet the community's diverse social and economic housing needs are provided for in residential zones, including households that involve an element of supervision, assistance, care and/or treatment support. This will help build resilient and strong communities and give effect to the RMA and NPS-UD.
S28.8	Objective MUZ-O1 and rules in CCZ, TCZ and MUZ	Oppose and seek amendment	<ol style="list-style-type: none"> Amend the following objectives and policies to enable Community Corrections Activities: <ul style="list-style-type: none"> Mixed Use Zone Objective MUZ-O1. Amend the rules in the following zones to enable Community Corrections Activity to be undertaken as permitted activities: <ul style="list-style-type: none"> City Centre Zone. 	<p>Amend the objectives, policies, and rules to enable "Community Corrections Activity" as a permitted activity. The rules as proposed do not currently refer to "Community Corrections Activity" as defined by the UHCDP, so they default to "activities not otherwise provided for" rules in the city centre which have a discretionary activity status.</p> <p>Community corrections activities are essential social infrastructure and play a valuable role in reducing</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<ul style="list-style-type: none"> • Town Centre Zone. • Mixed Use Zone. 	<p>reoffending, building strong and resilient communities, and enabling people and communities to provide for their social and cultural well-being and health and safety to achieve the purpose of the RMA.</p> <p>Intensification and population growth in urban areas creates more demand for these types of facilities, specifically as the population increases the need for community corrections services also increases.</p> <p>It is important that provision is made to enable non-custodial community corrections sites to establish, operate and redevelop, within appropriate areas.</p>
Submitter 29: Farrah Breads Family Trust				
S29.1	Maps	Seek amendment	Rezoning of land at 57 Kiln Street to general residential.	<p>The proposed zoning maps under the proposed IPI for 57 Kiln Street, Silverstream, which is 4.03 hectares in area. The specific area of the site this submission relates to is identified at Appendix A of the submission. This area is currently unused by the existing industrial operation and vegetated with a mixture of indigenous and exotic species with a gentle slope from the existing factory towards the residential sites to the south-west of the site.</p> <p>The site is currently zoned Industrial under the Operative District Plan and is not proposed to be re-zoned under the proposed IPI. The subject area has no District Plan restrictions over it which would impact on the ability to subdivide and construct residential dwellings.</p> <p>The site is not identified as contaminated under the GWRC Selected Land Use Register (SLUR) and the subject area has not been used for industrial purposes, such that the site is</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>unlikely to have contained activities listed on the Hazardous Activities and Industries List (HAIL).</p> <p>The identified subject area be re-zoned to General Residential Area under the proposed IPI to provide for residential development in accordance with the MDRS standards. The area is located at the western portion of the site.</p> <p>This area has been selected due to its topography, its unsuitability for industrial use, and its proximity to existing residential areas.</p> <p>This area is suitable for re-zoning for the following reasons:</p> <ul style="list-style-type: none"> • The area is unsuitable for industrial use due to the sloping topography of the subject area and the proximity to the adjacent established residential area. The proposed area for rezoning has been deliberately located around the existing water tank due to the existing industrial operation’s use of the water tank. • The proposed re-zoning provides opportunity for further residential sites which will accommodate future dwellings being built on them. This will add additional housing stock to Upper Hutt, which will assist with housing capacity. • The area proposed for rezoning is of a suitable size to accommodate several sites and associated dwellings. The exact layout of any future subdivision will be determined at the time of applying for resource consent. • The area of land to the north-west of the site and directly across the road from the area requested to be re-zoned is proposed for the High-Density Residential Zone under the proposed IPI. <p>Therefore, re-zoning the subject area to General Residential Area is not unprecedented in the immediate environment.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>The proposed re-zoning will complement the existing residential area.</p> <ul style="list-style-type: none"> • The area can support the additional housing. <p>The site is within a 10-minute walk to the Silverstream rail station and a 5-minute walk to two bus stops located to the east of the site, on Field Street. Additionally, the site is within a 10-minute walk to the Silverstream Centre which contains several shops, a supermarket, a doctor’s surgery, and a pharmacy. State Highway 2 is a 2-minute drive from the site which connects the site south towards Wellington City, or north, towards Upper Hutt City.</p> <ul style="list-style-type: none"> • Kiln Street is approximately 8m wide and is identified as a Local Road in Chapter 37 of the Operative District Plan. <p>Therefore, the existing roading infrastructure in the immediate area can support additional housing.</p>
Submitter 30: Kim Gutchlag and Patrick Waddington				
S30.1	Entire IPI	Seek amendment	<p>Every application to build dwellings of more than two storeys must be carefully scrutinised by the Council and permitted only where certain standard criteria can be met.</p> <p>Its Intensification Planning Instrument has clearly had regard for some of these, but perhaps not all.</p> <p>For any proposed new housing block of three storeys or more to be acceptable anywhere in the city, it must be demonstrated that:</p> <ol style="list-style-type: none"> 1. its likely effect on the natural environment including birdlife will be mitigated by 	<p>The prospect of a future with more and more three- to six-storeyed dwellings in residential areas is depressing, and we entreat our Council to do everything it can to limit their number and prevent developers from transforming much of Upper Hutt for the worse.</p> <p>It was also very naive of a government to think that people living crowded along a railway line would give up their cars and go everywhere by train: railways in New Zealand function so erratically, having very frequent stoppages for maintenance, and don't necessarily serve places where people want to go. Besides, many streets throughout New Zealand in the close vicinity of a railway station may be among a city’s loveliest, as is our York Avenue!</p> <p>We regret that Upper Hutt has not joined up with councils throughout New Zealand in resisting or seeking to mitigate the government’s unfortunate and ill-considered</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>obligatory planting of appropriate trees and shrubs.</p> <p>2. the extent of concrete surfaces around it must be kept to a minimum, to reduce the likelihood of flooding of neighbouring properties, to provide space for planting of trees and shrubs, and to retain some unsurfaced land available for waste disposal following an earthquake or other natural disaster.</p> <p>3. it must be sited far enough away from existing houses not to impair their inhabitants' privacy, free movement, and quality of life.</p> <p>4. it must not obstruct sunlight from surrounding properties.</p> <p>5. it must not destroy the pleasant outlook of surrounding properties for which these were located where they are.</p> <p>6. it must not create wind tunnels for surrounding properties.</p> <p>7. it must have adequate provision for tenants' off-street vehicle parking, whether underground or not, so that roadways are not clogged up with cars and in some cases perhaps even made impassable.</p> <p>8. the approach to it by ambulances, delivery vans, service vehicles, tradespeople and rubbish collectors must be safe and unimpeded.</p> <p>9. it must have adequate, safely fenced play areas for resident families with children.</p>	<p>intensification policy, which is likely to make New Zealand a much less pleasant country to live in.</p> <p>Rather than, for example, attempting to disperse population growth across the country more evenly or establishing entirely new towns, it has provided a recipe for social conflict and slums. It is most important to recognise the past and present experience of many cities overseas, including London, Paris and Glasgow, where many multi-storeyed blocks of flats have become unpleasant and often dangerous, with inferior cladding, broken lifts, permanent graffiti, unsafe approaches, inadequate play areas, and even in some cases violent intimidation by drug gangs. This is not to be thought of as something that couldn't happen here, but as a lesson to be learnt.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>10.its pedestrian access and entrances must be safe and unobstructed, including for prams and wheelchairs.</p> <p>11.the building materials used, including for its cladding, must be of prime quality and resistant to fire and water damage.</p> <p>12.assurance must be given that any internal corridors, stairs, lifts, doors, windows and balconies will be safe, reliable and fireproof.</p> <p>13.the proposed building must be aesthetically pleasing and aspire to improve rather than detract from the existing environment; and</p> <p>14.the consequential costs of any kind determined by the Council to be necessary such as those due to new drains, safety walls and fences, realigned public pavements, traffic lights or roundabouts in the general area of the dwellings or groups of dwellings must be met by developers, not by Upper Hutt ratepayers at large.</p>	
Submitter 31: Julie Cowan				
S31.1	Entire IPI	Oppose	These new rules need to be carefully reviewed for the sake of Upper Hutt and the Environment! My decision would be to oppose (housing of at least 6 storeys within walking distance of trains and the CBD, three storeys in residential zones, no maximum height in city centre and developers to pay for infrastructure). More restrictions and resource consents should be required to	<p>I oppose housing at least six storeys within walking distance of trains and the CBD in the proposed high density residential zone</p> <p>I oppose having no maximum height for City Centre Buildings</p> <p>There should be a maximum height restriction and also abide by building code so buildings are up to specifications should there be a major earthquake.. Worried Upper Hutt will loose</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			protect our people and especially our environment!	<p>its appeal. Upper Hutt City will become a concrete jungle with no thought to the environment</p> <p>Can Upper Hutt cope with the sudden influx of people? Pressure on essential services, Health etc.</p> <p>Oppose developers to pay more up front to fund infrastructure required for growth. Developers should not be able to pay extra money for less restrictions!! Money should not be a factor!!</p> <p>Native trees possibly hundreds of years old that have been overlooked and are not on the Notable Trees register are being chopped down in urban areas to squeeze yet another unit.</p>
Submitter 32: Z Energy Limited				
S32.1	Entire IPI	Not stated	<p>a) Achieve the following:</p> <ul style="list-style-type: none"> i. The purpose and principles of the RMA consistency with the relevant provisions in Sections 6 - 8; ii. Give effect to the Wellington Regional Policy Statement; iii. Assist the Council to carry out its functions under Section 31 of the RMA; iv. Meet the requirements of the statutory tests in section 32 of the RMA; and v. Avoid, remedy or mitigate any relevant and identified environmental effects. <p>b) Make any alternative or consequential relief as required to give effect to this submission, including, to the degree there is scope, any consequential relief required in</p>	<p>In addition to the specific outcomes and relief sought general relief is sought in relation to achieving the purpose of the RMA, giving effect to the RPS, meeting sections 31 and 32 of the RMA, and any consequential amendments and relief to address the issues raised in the submission.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>any other sections of the Upper Hutt City District Plan (“the District Plan”) and/or the IPI that are not specifically subject of this submission but where consequential changes are required to ensure a consistent approach is taken throughout the documents; and</p> <p>c) Any other relief required to give effect to the issues raised in this submission.</p>	
32.2	MUZ-R14	Support in part	Seek clarity on whether the PA in MUZ-R14 rule and associated compliance with the standards relates to new service station activities and alterations to existing activities (such as an upgrade to an existing service station in the Mixed Use Zone).	It is unclear whether the permitted activity in rule MUZ-R14 and associated compliance with the standards relates to new service station activities and alterations to existing activities (such as an upgrade to an existing service station in the Mixed Use Zone). Support permitted activity status for existing activities.
32.3	Definition for drive-through activity	Support	Retain the definition of drive through activity as notified insofar as it relates to customers generally being vehicle-centric (as opposed to pedestrian-centric) and includes service stations.	The definition of drive-through activity is supported insofar as it relates to customers generally being vehicle-centric (as opposed to pedestrian-centric) and includes service stations.
32.4	Definitions	Support in part	Retain the definition of service station as notified but apply it only to those zones affected by the IPI; or retain the definition as notified but ensure that the status of a vehicle orientated facility where the principal activity is the refuelling of motorised vehicles and sale of products does not consequentially change throughout the plan.	Amendments to the definition of service station are supported in that it includes refuelling of motorised vehicles. Refuelling of EVs is considered to be included in this definition. The definition is supported, in the context of the IPI only to the extent that it describes the principal activity as being the refuelling of motorised vehicles AND the sale of certain products and services. The term ‘and’ implies both components need to be met in order for the activity to be a service station, so unstaffed service stations (e.g. those without a shop), would not be permitted activities in, for

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				example, the Mixed Use zone. This can be supported in the context of the IPI, but the definition of service station is used throughout the Plan and in zones not affected by the IPI. As an example, service stations that do not meet the new definition (eg: truck stops) would no longer be controlled activities in the Industrial zone. The change proposed have consequential implications on the entire district plan, are not supported and are considered questionable in terms of scope.
32.5	MUZ-R3	Support	Retain Rule MUZ-R3 as notified.	Demolition of buildings is a permitted activity under Rule MUZ-R3 and this is supported.
32.6	MUZ-R14	Support	Retain the permitted activity status of Drive through activities in rule MUZ-R14 subject to meeting two qualifying standards relating to GFA and Rule MUZ-S6.	<p>The activity status for drive through activities in Rule MUZ-R14 is supported, including insofar as it does not differentiate between new or existing drive through activities and so includes additions, alterations, redevelopment, upgrades, new structures and changes to an existing service station / drive through activity. The requirement for permitted activity drive throughs to comply with the two qualifying standards is supported, notwithstanding that changes are also sought to those standards.</p> <p>Retain the permitted activity status of Drive through activities in rule MUZ-R14 subject to meeting two qualifying standards relating to GFA and Rule MUZ-S6.</p>
32.7	MUZ-R14(1)(a)	Oppose and seek amendment	Amend Rule MUZ-R14(1)(a) to exclude parking and manoeuvring areas at service stations from the calculation of GFA. One way of achieving this outcome would be to make the following changes: Drive through Activity 1. Activity status: Permitted	Most service stations have a relatively small building footprint and a comparatively larger area of hardstand. The spaces adjacent to fuel dispensers, car care areas have not traditionally been interpreted as 'parking spaces' and external parking and manoeuvring areas have not been interpreted as part of GFA. The IPI is designed to introduce new outcomes into the District Plan and, as such, clarity about interpretation

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>Where:</p> <p>a. The gross floor area of the activity including parking and manoeuvring areas does not exceed 1,500m². <u>For the purposes of this standard, except for service stations, gross floor area shall include parking and manoeuvring areas; and....</u></p>	<p>is required. Do not support the PA condition 1a.) under rule MUZ-R14 if it includes the car parking and manoeuvring areas of service stations, parking spaces associated with car care and /or other hardstand areas facilitating access to and throughout the site as this would mean that service stations were not permitted activities. Most modern service stations have an area exceeding 1500m².</p>
32.8	MUZ-R14(1)(b)	Support	Retain MUZ-R14(1)(b)	<p>The second qualifying standard (Condition 1b.) for PA status under MUZ-R14 is supported, notwithstanding that changes are sought to MUZ-S6 (Landscaping and Screening), (see separate submission points).</p>
32.9	MUZ-S6	Oppose and seek amendment	<p>Amend Standard MUZ-S6 as follows (or other wording that will address concerns:</p> <p>1. provision of an entry point to the site, be adequately screened by a fence or landscaping where they are visible from any:</p> <p>a. Public road;</p> <p>b. Other public space; or</p> <p>c. <u>The ground level of any directly adjoining site zoned Residential or Open Space and Recreation.</u></p> <p>Amend clause 2, as follows:</p> <p>2. a. Be fully screened, by either <u>a 1.8m high fence fencing or the equivalent in landscaping or a combination of both</u>, from any directly</p> <p>b.to individual parking spaces for residential development, if provided <u>or where the site is utilised by an existing service station activity.</u></p> <p>Amend clause 3, such that it does not apply</p>	<p>Standard MUZ-S6 must be met (via MUZR14(1)(b) to maintain permitted activity status). It is not clear what is meant by “adequately screened”. Screening from adjoining sites is impracticable unless it is only required from ground floor level of those sites as they could be three storey’s or more in height, which would require complete enclosure of certain areas (including carparks). This is not considered to be the intention, nor is it considered necessary. Existing and established service stations have a significant number of traffic movements and visibility to the forecourt and signage is critical to a successful and safe operation. so landscaping needs to be carefully managed. Clause 2(b) has the potential to compromise functional operations at existing service station sites and an exclusion for such activities from clause 2(b) is warranted. For clause 3 clarification is required that landscaping for ground level parking areas not contained within buildings is not in addition to the landscaping required in clause 2, for example, where the ground level parking is along the site boundary directly adjoining a site zoned Residential or Open Space and Recreation, or directly adjoining the front boundary.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>in addition to the landscaping required in clause 2.</p> <p>3. At least 5% of any ground level parking area not contained within a building <u>and not directly adjoining the boundaries where screening or landscaping is required by clause (2) above.</u></p>	
Submitter 33: Fuel Companies				
S33.1	Entire IPI	Not stated	<p>a) Achieve the following:</p> <p>i. The purpose and principles of the RMA consistency with the relevant provisions in Sections 6 - 8;</p> <p>ii. Give effect to the Wellington Regional Policy Statement;</p> <p>iii. Assist the Council to carry out its functions under Section 31 of the RMA;</p> <p>iv. Meet the requirements of the statutory tests in section 32 of the RMA; and</p> <p>v. Avoid, remedy or mitigate any relevant and identified environmental effects.</p> <p>b) Make any alternative or consequential relief as required to give effect to this submission, including, to the degree there is scope, any consequential relief required in any other sections of the Upper Hutt City District Plan (“the District Plan”) and/or the IPI that are not specifically subject of this submission but where consequential changes are required to ensure a consistent approach is taken throughout the documents; and</p> <p>c) Any other relief required to give effect to the issues raised in this submission.</p>	<p>In addition to the specific outcomes and relief sought general relief is sought in relation to achieving the purpose of the RMA, giving effect to the RPS, meeting sections 31 and 32 of the RMA, and any consequential amendments and relief to address the issues raised in the submission.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S33.2	MUZ-R14	Support in part	Seek clarity on whether the PA in MUZ-R14 rule and associated compliance with the standards relates to new service station activities and alterations to existing activities (such as an upgrade to an existing service station in the Mixed Use Zone).	It is unclear whether the permitted activity in rule MUZ-R14 and associated compliance with the standards relates to new service station activities and alterations to existing activities (such as an upgrade to an existing service station in the Mixed Use Zone). Support permitted activity status for existing activities.
S33.3	Definitions	Support	Retain the definition of “drive through activity” as notified insofar as it relates to customers generally being vehicle-centric (as opposed to pedestrian-centric) and includes service stations	The definition of drive-through activity is supported insofar as it relates to customers generally being vehicle-centric (as opposed to pedestrian-centric) and includes service stations
S33.4	Definitions	Support in part	Retain the definition of “ service station” as notified but apply it only to those zones affected by the IPI; or Retain the definition as notified but ensure that the status of a vehicle orientated facility where the principal activity is the refuelling of motorised vehicles and sale of products does not consequentially change throughout the plan.	Amendments to the definition of service station are supported in that it includes refuelling of motorised vehicles. Refuelling of EVs is considered to be included in this definition. The definition is supported, in the context of the IPI only to the extent that it describes the principal activity as being the refuelling of motorised vehicles and the sale of certain products and services. The term ‘and’ implies both components need to be met in order for the activity to be a service station, so unstaffed service stations (e.g. those without a shop) , would not be permitted activities in, for example, the Mixed Use zone. This can be supported in the context of the IPI, but the definition of service station is used throughout the Plan and in zones not affected by the IPI. As an example, service stations that do not meet the new definition (eg: truck stops) would no longer be controlled activities in the Industrial zone. The change proposed have consequential implications on the entire district plan, are not supported and are considered questionable in terms of scope.

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S33.5	MUZ-R3	Support	Retain Rule MUZ-R3 as notified.	Demolition of buildings is a permitted activity under Rule MUZ-R3 and this is supported.
S33.6	MUZ-R14	Support	Retain the permitted activity status of Drive through activities in rule MUZ-R14 subject to meeting two qualifying standards relating to GFA and Rule MUZ-S6.	<p>The activity status for drive through activities in Rule MUZ-R14 is supported, including insofar as it does not differentiate between new or existing drive through activities and so includes additions, alterations, redevelopment, upgrades, new structures and changes to an existing service station / drive through activity. The requirement for permitted activity drive throughs to comply with the two qualifying standards is supported, notwithstanding that changes are also sought to those standards.</p> <p>Retain the permitted activity status of Drive through activities in rule MUZ-R14 subject to meeting two qualifying standards relating to GFA and Rule MUZ-S6.</p>
S33.7	MUZ-R14(1)(a)	Oppose and seek amendment	<p>Amend Rule MUZ-R14(1)(a) to exclude parking and manoeuvring areas at service stations from the calculation of GFA. One way of achieving this outcome would be to make the following changes:</p> <p>Drive through Activity 1. Activity status: Permitted</p> <p>Where:</p> <p>a. The gross floor area of the activity <u>including parking and manoeuvring areas</u> does not exceed 1,500m². <u>For the purposes of this standard, except for service stations, gross floor area shall include parking and manoeuvring areas; and...</u></p>	<p>Most service stations have a relatively small building footprint and a comparatively larger area of hardstand. The spaces adjacent to fuel dispensers, car care areas have not traditionally been interpreted as 'parking spaces' and external parking and manoeuvring areas have not been interpreted as part of GFA. The IPI is designed to introduce new outcomes into the District Plan and, as such, clarity about interpretation is required. Do not support the PA condition 1a.) under rule MUZ-R14 if it includes the car parking and manoeuvring areas of service stations, parking spaces associated with car care and /or other hardstand areas facilitating access to and throughout the site as this would mean that service stations were not permitted activities. Most modern service stations have an area exceeding 1500m².</p>
S33.8	MUZ-R14(1)(b)	Support	Retain MUZ-R14(1)(b)	The second qualifying standard (Condition 1b.) for PA status under MUZ-R14 is supported, notwithstanding that changes

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				are sought to MUZ-S6 (Landscaping and Screening), (see separate submission points).
S33.9	MUZ-S6	Oppose and seek amendment	<p>Amend Standard MUZ-S6 as follows (or other wording that will address concerns:</p> <p>1. provision of an entry point to the site, be adequately screened by a fence or landscaping where they are visible from any:</p> <p>a. Public road;</p> <p>b. Other public space; or</p> <p>c. <u>The ground level of any directly adjoining site zoned Residential or Open Space and Recreation.</u></p> <p>Amend clause 2, as follows:</p> <p>2. a. Be fully screened, by either <u>a 1.8m high fence fencing or the equivalent in landscaping or a combination of both</u>, from any directly</p> <p>b.to individual parking spaces for residential development, if provided <u>or where the site is utilised by an existing service station activity.</u></p> <p>Amend clause 3, such that it does not apply in addition to the landscaping required in clause 2.</p> <p>3. At least 5% of any ground level parking area not contained within a building <u>and not directly adjoining the boundaries where screening or landscaping is required by clause (2) above.</u></p>	<p>Standard MUZ-S6 must be met (via MUZR14(1)(b) to maintain permitted activity status). It is not clear what is meant by “adequately screened”. Screening from adjoining sites is impracticable unless it is only required from ground floor level of those sites as they could be three storey’s or more in height, which would require complete enclosure of certain areas (including carparks). This is not considered to be the intention, nor is it considered necessary. Existing and established service stations have a significant number of traffic movements and visibility to the forecourt and signage is critical to a successful and safe operation. so landscaping needs to be carefully managed. Clause 2(b) has the potential to compromise functional operations at existing service station sites and an exclusion for such activities from clause 2(b) is warranted. For clause 3 clarification is required that landscaping for ground level parking areas not contained within buildings is not in addition to the landscaping required in clause 2, for example, where the ground level parking is along the site boundary directly adjoining a site zoned Residential or Open Space and Recreation, or directly adjoining the front boundary.</p>
Submitter 34: Mary Beth Taylor				

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S34.1	Entire IPI	Support in part	Add additional and stronger environmental protections and enhancements in the Plan Change, research limits to growth for Upper Hutt, move ahead to enable urban intensification particularly along the existing main transport corridors	<p>I note that the existing Special Character Zone around the Golf Road, Barton Road and other areas is not mentioned in the IPI. Why not? Will this be included in the urban intensification plans for the city? Is this an equity issue?</p> <p>Papakāinga provisions are welcomed and long overdue. Having lived in SE Alaska (Juneau) in the 1970's I witnessed poor urban design for the local indigenous people. The result was an isolated, fenced 'Indian Village' with poorly, cheaply built, unhealthy housing along mud roads. I know this is not acceptable for this PC and hope to see the best urban design and healthy homes principles applied to papakāinga. In addition include maraes or spiritual gathering places and mara kai to create fully integrated and functional communities to include not only dwellings but active spaces where people can engage in meaningful work to support their community.</p> <p>Infrastructure first. Combine the need to expand and strengthen infrastructure with climate change mitigations. Include renewable generation-micro distributed or included in building plans for individual dwellings. Include carless areas with permeable surfaces. Create a ring road for CBD, and a carless Main Street with provision for disabled access. Include cycle lanes and secure cycle storage on all main arterials such as Fergusson Drive, Alexander Road. Include storm water collection and storage for toilets, garden, car, pool where potable water is not necessary. Include a 3000lt minimum storage capacity for all dwellings either individual tanks or collective tanks. These tanks can be designed as in underground storage with car parking on top. More impermeable surface</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>Financial contributions (max \$10,000) is light. The need to incorporate renewable energy and other sustainability features into future infrastructure will be much more costly than it currently is. Increase development contributions to at least \$20,000 per allotment if not more</p> <p>Any future development must be dictated by the environment's ability to sustain all life without depletion and with enhancement. The current poor health of Te Awakairangi shows that the river is already indicating it has reached its limit and further growth/extraction of water will further damage it. Much (much!) better water management and building code changes to introduce mandatory water collection and storage for new dwellings could help ease increasing pressure on the river. We need to know how far we can push the environment and resources and still maintain a healthy, function local natural environment.</p> <p>I support all provisions in the Plan Change with considerations but there is a need to moderate intensification in areas that are already well functioning communities and where intensification is naturally controlled by difficult topography such as Pinehaven hills</p>
34.2	GRZ-PREC-01	Seek amendment	Amend wording of GRZ-PREC-01 to delete the word 'encouraged' and include 'mandatory' or similar wording.	<p>Plan to be protective of the natural environment in all cases. "The maintenance of indigenous biological diversity values within the Indigenous Biodiversity Precinct is encouraged." "Encouraged" is not strong enough language. The protection and enhancement of indigenous biodiversity is a must. Change 'encouraged' to "mandatory' or similar</p>
34.3	Indigenous Biodiversity Precinct	Seek amendment	Seek more Biodiversity Precincts including formalising and enhancing the Green Belt along the hills that frame the entire Upper	The NPS IB will support stronger indigenous biodiversity provisions. "The Indigenous Biodiversity Precinct identifies areas where the Council is applying additional policy direction

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			Hutt river valley, east and west, north and south including the Silverstream Spur in its entirety as a road free reserve	and guidance regarding significant natural areas that have been identified for the purpose of giving effect to section 6(c) of the RMA and Policies 23 and 24 of the RPS, but have not yet been incorporated into the district plan via a comprehensive plan change." The lack of detail around the where and how of establishing the Biodiversity Precinct makes me nervous. This is not an optional future add-on. Biodiversity protection and enhancement must be at the core of all development from now on. There must be more than one Biodiversity Precinct.
34.4	Not stated	Seek amendment	Landscaping to include at least 50% indigenous vegetation.	Landscaping must include a high percentage (at least 50%) of indigenous vegetation. This will help to re-create nature corridors across the river valley to join the east/west hills and provide safer passage and habitat for fauna.
Submitter 35: Wellington Electricity Lines Limited				
S35.1	Qualifying Matters	Seek amendment	It is sought that, as a mechanism, 'Qualifying Matters' be applied by Council in relation to the substation site identified in this submission to the extent that neighbouring (abutting) Medium and High Density Standard Zone properties cannot develop (as a permitted activity) multi-unit housing only 1.0m setback for the boundary and up to 20m in height.	Qualifying Matters ensure that higher density housing 3 intensification on land abutting established electricity facilities is provided for, so as to mitigate the actual and potential effects of reverse sensitivity.
35.2	Qualifying Matters	Seek amendment	WELL seek that intensified urban development is appropriately regulated through the qualifying matters provisions in the legislation on land which abuts critical Regionally Significant Infrastructure and associated facilities such as the identified Substations.	Seek Council's agreement to apply their discretion in treating the designated zone substations as a 'Qualifying Matter' under the NPSUD, and thus protect the critical electricity supply facility from the adverse effects of actual or potential reverse sensitivity. WELL considers that Council's ability to regulate intensification in the MRDS and High Density Zone through qualifying matters could be applied to such areas

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				immediately abutting existing sites and facilities owned by WELL. Section 77I of the legislation - (Qualifying matters in applying medium density residential standards and policy 3 to relevant residential zones) of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 - allows Council to make the relevant requirements within pockets of the high density areas less enabling of development if it is considered inappropriate for the area to accommodate it.
35.3	Not stated	Seek amendment	Seeks that all activities and development adjoining the Brown Owl and Trentham Substations must comply with the provisions of the underlying Residential Activity Area of the ODP as they currently stand (as are currently operative).	WELL does not wish to prohibit intensified development being undertaken adjacent to the facilities as this is not the primary concern being expressed; rather, WELL seeks that any intensification of the above mentioned properties surrounding the substations are provided for as restricted discretionary development so as to adequately integrate appropriate feedback from WELL (as an affected party) and the provision of mitigation against the potential adverse effects of reverse sensitivity (i.e., noise mitigation, screening, health and safety).
35.4	GRZ and HRZ provisions; and Maps.	Seek amendment	Seek that the sites identified in this submission are identified on the applicable district planning map overlays with appropriate annotations to the effect that either medium or high density housing developments on abutting sites will require a land use consent as a Restricted Discretionary Activity thus enabling an effects assessment to be provided with appropriate reverse sensitivity mitigation being inherent to the development.	WELL's infrastructure operation and development across Upper Hutt City is recognised and protected in the wake of housing intensification – and furthermore, that the proposed IPI adequately recognises the potential effect of reverse sensitivity on the District's electricity supply network. WELL's electricity infrastructure is a significant physical resource that must be sustainably managed, and any adverse effects on that infrastructure must be remedied or mitigated – the impacts of the IPI currently being proposed is no exception to this management requirement.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
35.5	GRZ-P1 and HRZ-P1	Seek amendment	Should Council consider the ISPP process unable to adopt the sought relief, WELL alternatively seeks that the permitted activity performance standards contained within the IPI for Medium and High Density housing include reference to the potential effects of Regionally Significant Infrastructure, in particular linking the provisions to Proposed Policy GRZ-P1B and HRZ-P1 of the ODP – and to amend the Policies as follows (additional text underlined): <i>Apply the MDRS across all relevant residential zones in the district plan except in circumstances where a qualifying matter is relevant (including matters of significance such as significant natural areas, <u>Regionally Significant Infrastructure</u>, historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga).</i>	To address the potential reverse sensitivity effects of the proposed housing intensification reverse sensitivity on Regionally Significant Infrastructure such as the Brown Owl and Trentham Zone Substations. It is important to note that such planning direction will ultimately require WELL to undertake significant works within the existing sections of distribution network that currently services the District - as well as to strategically plan for the required network expansion that will need to be sequenced to enable connections to the area’s ensuing residential and commercial land use growth.
35.6	Entire IPI	Seek amendment	WELL seek that Policy NU-P3 of the ODP is similarly reflected in the MRDS to ensure the adverse effects of the proposed housing intensification appropriately consider the adverse effects of reverse sensitivity on Regionally Significant Infrastructure such as the Brown Owl and Trentham Zone Substations.	The critical role and service these substations sites provide to current and future residents of the City, WELL wishes to ensure that only appropriate housing development occurs within close proximity to such facilities so as to ensure its continued safe and efficient functioning. WELL wishes to raise Council’s awareness of the critically important Brown Owl Zone Substation and the Trentham Zone Substation, and seeks to have future residential intensification surrounding the sites reflect the established operation of the substation facilities – and thus mitigate the potential adverse effects of reverse sensitivity.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
35.7	Entire IPI	Seek amendment	WELL seeks to ensure protection of existing and lawfully established key substation sites which are located within the City's residential areas. The central point of protection stems from the actual and or potential effects of reverse sensitivity that will potentially be brought about through IPI implementation, and which will significantly increase the intensity of sensitive land use in close proximity to established substation facilities.	WELL's Brown Owl and Trentham Zone Substations are examples of lawfully established activities. Intensifying sensitive residential land use on properties abutting these facilities will increase the risk of reverse sensitivity – unless adequate recognition in the IPI is provided. As the City grows, so too will its demand for electricity and hence the demand on the Brown Owl and Trentham Substations. Such growth could ultimately require upgrades to the substations (for example new larger transformer(s) and possibly additional feeder lines).
35.8	Entire IPI	Seek amendment	WELL seeks that any intensification of properties surrounding the substations are provided for as restricted discretionary development so as to adequately integrate appropriate feedback from WELL (as an affected party) and the provision of mitigation against the potential adverse effects of reverse sensitivity (i.e., noise mitigation, screening, health and safety).	To address the potential reverse sensitivity effects of the proposed housing intensification reverse sensitivity on Regionally Significant Infrastructure such as the Brown Owl and Trentham Zone Substations. It is important to note that such planning direction will ultimately require WELL to undertake significant works within the existing sections of distribution network that currently services the District - as well as to strategically plan for the required network expansion that will need to be sequenced to enable connections to the area's ensuing residential and commercial land use growth.
Submitter 36: Somerset Group Holdings				
S36.1	Entire IPI	Support in part	Somerset supports the inclusion of changes that are provided by the MDRS provision of the Enabling Housing Supply Act.	The Retirement Villages Association of New Zealand has made a submission on the provisions for zones, which is supported by Somerset.
Submitter 37: Kimberley Vermaey				
S37.1	Entire IPI	Seek amendment	Seek amendments including: a)The threshold should be reduced to 4 residential units in HDZ instead of 6;	The new high-density zone sets a maximum permitted number of residential units on a site as 6. This is highly permissive and will lead to poor urban design outcomes. Due to how the other rules of the chapter work, there is no

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>b) rules be worded to only require hydraulic neutrality for buildings containing residential units that are connected into the council mains via either a lateral or kerb to channel connection. It should not apply to soakpit designs;</p> <p>c) new Matters of Discretion when a development does not comply with the standards are just a replication of one another and are not specific to the non-compliance, amend to be specific;</p> <p>d) 60% site coverage for HDRZ would be more appropriate than 70%;</p> <p>e) include fence standards, It is suggested that a maximum fence height of 1.8m on the side boundary and 1.5m on the front boundary would be appropriate;</p> <p>f) GRZ-Precinct 1 Matters of Discretion do not mention vegetation protection. Amend to either:</p> <ol style="list-style-type: none"> 1. Make the protection of indigenous vegetation as a matter of discretion for all residential development that exceeds the maximum number of permitted residential units and site coverage non-compliances. This would have the benefit of applying to all sites in the urban areas and allows for the protection of significant vegetation that may be on site and will align with the proposed RPS-direction; or 2. Have a rule framework that requires introduces a vegetation protection consideration matter for new buildings in 	<p>control around having good solar access to outdoor living or internal living areas, the need for residential units to face the street, and generally trying to achieve good urban design outcomes for the City. The proposed approach is inconsistent with both Lower Hutt and Wellington City. The threshold should be reduced to 4 residential units as with these other cities. This will strike a balance between ensuring appropriate development is allowed for, while also ensuring more intense development achieves good urban design outcomes. I think it is important for Upper Hutt to recognise that a large amount of its future development is likely to be in the form of terraced housing and multi-unit development and therefore the rules should be designed for this development form. The threshold for 6 residential units is inconsistent with how the Wellington Regional Water Services Standards work. These standards set a threshold of 3 residential units to when on-site mitigation is required to be considered to address the impacts of development on infrastructure. This higher level that Upper Hutt is proposing is inconsistent with the current Wellington Water approach and could result in significant impacts on infrastructure (including existing areas that are constrained). Again, a four residential unit limit is sought to allow for the consideration of the demand of future infrastructure to be considered. I would be surprised if Wellington Water was comfortable with such a high permitted threshold. Within the HRZ-S4 a site coverage maximum of 70% has been set. However, for most of Upper Hutt City, stormwater control is through soakpit designs. There are minimum clearance distances that apply to soakpits from building edges. This high site coverage would likely not allow for these clearances to be met and therefore represents a threshold that cannot be met. Furthermore given the 20% landscaping requirement, outdoor living requirements and outlook requirements, and the fact that</p>

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			<p>the Precinct area, when a building does not comply with the permitted activity standard.</p> <p>g) There needs to be an objective, policy and rule framework to address the wind effects from new buildings over 12m in height.</p> <p>h) any consequential changes needed to the District Plan to ensure that the submission points are achieved</p>	<p>sites need appropriate pedestrian access it would be very difficult to ever achieve this 70% threshold. I feel that 60% site coverage for this standard would be more appropriate and would ensure that sites have sufficient space to provide for their servicing needs, access, while also meeting other District Plan standards requirements. A 60% requirement would still be more generous than the MDRS provisions and would still allow for housing yields to be met. It feels like this 70% provision has not been tested against the Wellington Water requirements as well as other District Plan standards.</p> <p>It would be appropriate to bring in a rule that limits development around stream edges to allow for better environmental outcomes that align Regional Policy Statement and Proposed Natural Resources Plan. These include improved water quality, riparian margins, cultural outcomes and conveyancing of flood flows. The Enabling and Housing Bill would allow for these setbacks to be introduced as a qualifying matter. This change would require objective, policy, and rule changes to the High Density and General Density Residential Zones.</p> <p>The proposed GRZ-Precinct 1 is pointless at the moment as there are no rules that relate to the vegetation retention. As the rule framework for residential development in the GRZ and HDRZ that intersect GRZ-Precinct 1 only elevates to Restricted Discretionary Activity status. The Matters of Discretion does not mention vegetation protection. As such, there is no way to give effect to the objective and policy direction. This can be addressed in two different ways:</p> <ol style="list-style-type: none"> 1. Making the protection of indigenous vegetation as a matter of discretion for all residential development that exceeds the maximum number of permitted residential units and site coverage non-compliances. This would have the

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>benefit of applying to all sites in the urban areas and allows for the protection of significant vegetation that may be on site and will align with the proposed RPS-direction; or</p> <p>2. Have a rule framework that requires introduces a vegetation protection consideration matter for new buildings in the Precinct area, when a building does not comply with the permitted activity standard.</p> <p>There is absolutely zero consideration of the potential impacts from wind from buildings over a certain height in the commercial and High Density Residential Zones. Wind deflection can present a significant risk to people and property. There needs an objective, policy and rule framework to address the wind effects from new buildings over 12m in height. Again this approach would be consistent with other District Plans and ensure that wind deflection issues are appropriately addressed from increased building height.</p> <p>The hydraulic neutrality rules GRZ-S9 needs greater clarity to determine compliance. For starters does this apply to all buildings as intended (even garden sheds) and what constitutes development within the rule wording (I believe this word should be removed). Furthermore, there is no allowance for climate change of soak pits. I feel the rule should be worded to only require hydraulic neutrality for buildings containing residential units and are also being connected into the council mains via either a lateral or kerb to channel connection. It should not apply to soakpit designs</p> <p>Related to the above is that under HRZ-S5 there is no consideration on the impact on infrastructure demand associated with developments that do not comply with this requirement. This appears to be a gap in the Matters of</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>Discretion and it seems that Upper Hutt is relying on the subdivision process for this to be captured. However, developers would be able to get around this by obtaining land use consent first prior to seeking subdivision consent. It is sought that the loophole is closed and that the impacts on infrastructure from development is added as a Matter of Discretion to this standard. For the purposes of completion the GRZ-R12A allows for the consideration of the impacts on infrastructure (though it is questioned given the age of the Code of Practice whether this is the most appropriate reference and whether it should be the Wellington Regional Water Services Standards.</p> <p>This submission covers any consequential changes needed to the District Plan to ensure that the above 17 points are achieved.</p> <p>There is a proposal to remove the screen rule (GRZ - PREC1-S9). This rule should be retained and expanded and rewritten to require storage areas to be screened from public spaces. As residential intensification increases, the provision of on-site services becomes more important. The rules at the moment would allow for unscreened storage areas which are unsightly and can detract from streetscape values. There should be a rule that requires this as a minimum basic requirement. A rule like this would be consistent with other councils in the region.</p> <p>The new Matters of Discretion when a development does not comply with the standards are just a replication of one another and are not specific to the non-compliance (which they should be). For example with HRZ-S2 one of the matters of non-compliance is setbacks and coverage. This should not be a matter for consideration in a height non-compliance.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>This is an issue for all the HRZ standards and needs to be reviewed and the matters of discretion made more specific to the effects from non-compliance. This may result in a substantive change in the matters of discretion for both the GRZ and HDRZ chapters. There is no clear rule framework around fences. Given the need for better urban design outcomes, there is a case for fence heights in the General and High Density Residential Zones to be further controlled. It is suggested that a maximum fence height of 1.8m on the side boundary and 1.5m on the front boundary would be appropriate. The 1.5m fence height on the front boundary should also have a permeability requirement of either 25% or 50% to ensure the passive surveillance outcome sought through the glazing rule is achieved.</p>
Submitter 38: Rowena Simpkins				
S38.1	Entire IPI	Oppose	I want this blanket housing intensification opposed.	<p>I oppose the government's housing intensification plan. Some of this type of housing is already being built in Upper Hutt in areas such as Royal and Gibbons Streets, Exchange Street, Merton Street and Marion. Street. Privacy and sunlight will be minimal with nowhere to grow food or flowers and no space for children to play on their own property.</p> <p>Upper Hutt City Council needs to stand strongly against this type of housing as Christchurch has done. People will be living like chickens in intensive chicken factory farms. The effect on mental health and well-being will be depression, anxiety, and feelings of claustrophobia. I will be gone by the time Upper Hutt's greenery and unique environment is replaced by wind tunnels and shade. I feel for those growing up now who will have this lifestyle to look forward to and for the children they have.</p>
Submitter 39: Design Network Architecture Limited				

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S39.1	Entire IPI	Seek amendment	We are seeking clarification of these standards, as per the attached document (see submission for details).	<p>This standard refers to glazing of the 'street-facing façade'. Does the street-facing façade apply to the full front elevation, even say if part of the elevation was set back further from the front boundary?</p> <p>We request that this be clarified, potentially through a definition being given for 'street facing façade'. If a site is being subdivided, how does this rule apply? Does the subdivision aspect mean that every proposed allotment then becomes a 'developed site', which would individually be required to comply with the 20% landscaped area? Or in cases of joint land use and subdivision applications would only the parent allotment (prior to subdivision) be required to meet the 20% landscaped area standard?</p> <p>GRZ-S8 specifically states that the height in relation boundary standard does not apply to 'existing or proposed internal boundaries within a site'. Could you please clarify whether this exclusion is also intended to apply to HRZ-S3? If not, we suggest that the High Residential Zone similarly host an exclusion for internal boundary recession planes.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
Submitter 40: Dean Spicer				
S40.1	Maps	Oppose and seek amendment	Rezone the property at 224a Parkes Lines Road and the surrounding block of land at 168/180/180A/186/216/224A/224B/264G Parkes Line Road, Maymorn to a density at least congruent to Large Lot Residential Zone under the National Planning Standards.	Oppose not rezoning land at 168/180/180A/186/216/224A/224B/264G Parkes Line Road, Maymorn to Large Lot Residential Zone. Rezoning would be consistent with the NPS-UD, and it is appropriate to rezone this entire block of land. This block of land is uniquely situated to provide for future growth and development opportunities. It is connected to infrastructure and has a reasonably gentle contour falling to the northwest. Rezoning will be consistent with the zoning on Maclaren Street and the northern side of Parkes Line Road which surround the block and provide for a transition from lifestyle sections sizes to larger rural land holdings to the south and east of the site. Network infrastructure including power, telecommunications, wastewater, and water services are already running along Parkes Line Road, Large Lot Residential land sizes are however capable of containing on-site effluent disposal and potable water supply if necessary. Transportation infrastructure access to the site and connectivity through the property can be easily achieved with a large frontage available along Parkes Line Road. The surrounding zoning, topography and infrastructure availability make this a logical extension of the lifestyle zoning, giving way to more intensive residential development at some point in the future, if not as part of the IPI. This block will add to the development capacity, satisfying Councils requirements to provide or realise development capacity along with enabling enhanced competitiveness which will assist with housing affordability.
Submitter 41: Greater Wellington Regional Council				
S41.1	Entire IPI	Seek amendment	That the IPI aligns with the direction and intent of regulatory policies that apply to district plans where necessary.	Greater Wellington considers there is sufficient scope to amend or introduce provisions as is necessary to manage the levels of intensification being enabled by the IPI. Some relief sought by Greater Wellington is as “related provisions” that are generally

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>considered consequential to the proposals for intensification, in order to manage the subsequent potential effects. This is consistent with the Environment Select Committee’s advice on the RMA Enabling Housing Supply and Other Matters Amendment Act to enable adjustments to other parts of the District Plan in an Intensification Streamlined Planning Process to manage issues and support the implementation of the MDRS. Greater Wellington considers there is therefore sufficient scope to amend or introduce the provisions as requested. The related provision relevant to each submission point is identified in Attachment 2.</p>
S41.2	Entire IPI	Support and seek amendment	<p>Include objectives, policies, permitted standards and rules that implement the recommendations directed at territorial authorities in the Te Whaitua te Whanganui-a-Tara Implementation Programme and Te Mahere Wai o Te Kāhui Taiao.</p>	<p>Intensification has the potential to increase stormwater and sediment runoff, which would lead to further degradation of waterbodies. The WIPs contain community-endorsed recommendations for dealing with the existing effects of urban areas on waterbodies, which are also applicable to urban intensification.</p>
S41.3	Entire IPI	Support and seek amendment	<p>Include objectives, policies, and methods (including rules) to give effect to RPS Objective 12, NPS-FM section 3.5(4), have regard to Proposed RPS Change 1 Policy FW.3 and implement Te Mahere Wai and the Te Whanganui a Tara Whaitua Implementation Programme.</p>	<p>While Greater Wellington supports the new direction on hydraulic neutrality in the IPI, the UHCC District Plan or IPI do not include provisions which promote positive effects and avoid, remedy, or mitigate adverse effects, including cumulative effects, of urban development on the health and well-being of water bodies and freshwater ecosystems (which is required under 3.5 of the NPS-FM).s80(E) of the RMA includes ‘related provisions’ that refer to qualifying matters of which giving effect to other national direction is one. It is Greater Wellington’s view that this request is within scope given district plans must give effect to all relevant national direction (such as relevant parts of the NPS-FM) and therefore the relevant policies in the Proposed RPS Change 1 and operative RPS which seeks to give effect to national direction. Section 3.5 of the NPS-FM is particularly</p>

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				<p>relevant given that it applies to both urban development and water. Connections should be made between all freshwater-related chapters to ensure an integrated approach as required by the NPS-FM, and freshwater direction should be woven throughout the IPI from policy direction through to rules and assessment matters.</p> <p>UHCC must have regard to Proposed RPS Change 1 when preparing or changing a District Plan under section 74(2)(a) of the Act. By the time decisions are made on the IPI, the regional plan is likely to be operative, at which point the IPI must not be inconsistent with the Natural Resources Plan for any matter specified in section 30(1) of the Act.</p>
S41.4	Entire IPI	Support and seek amendment	<p>Incorporate the following provisions (or amendments to existing provisions) across the District Plan:</p> <p>(a) Include a strategic direction objective and/or policies to provide direction regarding ki uta ki tai, partnering with mana whenua, upholding Māori data sovereignty, and making decision with the best available information including Mātauranga Māori.</p> <p>(b) Include a strategic direction objective and / or policy to require regard is had to equity and inclusiveness issues in decision making.</p>	<p>Greater Wellington considers there is a role for additional provisions in the IPI to give effect to the NPS-FM and have regard to Proposed RPS Change 1 direction to ensure that urban development occurs in a holistic, integrated manner. Equity and inclusiveness are essential to ensuring intensification is done in a way that is socially and culturally appropriate. The relevant Proposed RPS Change 1 policies are:</p> <ul style="list-style-type: none"> i Policy IM.1: Integrated management - ki uta ki tai – consideration ii Policy IM.2: Equity and inclusiveness – consideration. iii Policy FW.3(e): Urban development effects on freshwater and the coastal marine area – district plans.
S41.5	Entire IPI	Support and seek amendment	Incorporate the following provisions (or amendments to existing provisions) across the District Plan:	There is a role for additional freshwater provisions in the IPI to give effect to the National Policy Statement for Freshwater Management (NPS-FM), have regard to Proposed RPS Change 1

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>(a) Include a strategic level objective and policy that recognises mana whenua / tangata whenua and their ability to exercise rangatiratanga / kaitiakitanga and their relationship to their ancestral lands, water, sites, wahi tapu and taonga (Proposed RPS Change 1 Policy FW.3(c)).</p> <p>(b) A policy to recognise, protect and enhance the Māori freshwater values. Amendments to matters of control or discretion where required to enable considerations of the policy.</p> <p>(c) In relevant policies and rules, for example indigenous vegetation clearance and earthworks, include as a matter of control or discretion, the adverse effects on mahinga kai, other customary uses and access for these activities (Proposed RPS Change 1 Policy FW.3(b)).</p> <p>(d) Include a strategic objective and supporting policies to achieve management of the natural resources of the district or city in an integrated manner, recognising ki uta ki kai and the interrelationships between land, freshwater, the coast (Proposed RPS Change 1 Policy FW.3(e)).</p> <p>(e) Amend or include new controlled and restricted discretionary activity rules and include appropriate policy</p>	<p>direction in providing for urban intensification and development and to implement Te Whaitua te Whanganui-a-Tara Implementation Programme and Te Mahere Wai o Te Kahui Taiao. Given the permanence of urban development, the submitter considers it is essential that these factors are considered prior to determining the areas development is enabled. It does not appear that this has been considered in the IPI – as it is not explicit in the s32. It should also be noted that mahinga kai is a compulsory value in the NPS-FM 2020 and Upper Hutt City Council is required to include provisions in its district plan to manage effects of urban development on the health and wellbeing of freshwater bodies and freshwater ecosystems, which includes mahinga kai.</p> <p>The relevant Proposed RPS Change 1 policy is:</p> <ul style="list-style-type: none"> • Policy FW.3: Urban development effects on freshwater and the coastal marine area – district plans <p>There is also a relevant operative Regional Policy Statement policy in relation to restricting certain roof materials to minimise contamination in stormwater:</p> <ul style="list-style-type: none"> • Policy 42: Minimising contamination in stormwater from development.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>direction to manage any actual or potential effects of land use, development or subdivision and the effects of surface water activities on water quality (Proposed RPS Change 1 Policy FW.3(e)).</p> <p>(f) Include a policy that requires the use, development, and subdivision of land to consider effects on the harbour, rivers, lakes, wetlands, springs and riparian margins, including any relevant water quality attribute targets in a regional plan, ecosystem values and drinking water sources (Proposed RPS Change 1 Policy FW.3(h), (k), (l), (p) and (q)).</p> <p>(g) Include a policy and amend relevant rules to include triggers for consent and matters of control or discretion which require the application of water sensitive urban design principles, including sustainable stormwater design to minimise impacts on the natural environment and achieves outcomes additional to stormwater treatment such as providing amenity spaces, ecological habitat etc. (Proposed RPS Change 1 Policy FW.3(i) and (f)).</p> <p>(h) Insert policies and rules and/or rule requirements that restrict the use of copper and zinc building materials so as to minimise the effects of</p>	

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>these materials on water quality. Retain the building coverage standard of 50% for GRZ-S3 and 70% for HRZ-S4 but include 'the degree of water sensitive urban design' as a matter of discretion where the building coverage standard cannot be met. The Medium and High Density Design Guide could also be amended to expand the Stormwater Management section to be more explicit on the Principles of Water sensitive Urban design (Proposed RPS Change 1 Policy FW.3(i)).</p> <p>(i) Amend policies and rules to control subdivision, vegetation clearance and earthworks and prevent inappropriate activities and buildings in riparian margins (Proposed RPS Change 1 Policy FW.3(l)).</p> <p>(j) Include a policy and objective to protect and enhance the health and well-being of water bodies and freshwater ecosystems, including wetlands.</p> <p>(k) As a matter of control or discretion for subdivision and any other applicable activity, include:</p> <ul style="list-style-type: none"> i the extent to which the subdivision, use or development effects water quality, waterway values including hydrological and ecosystem processes, riparian 	

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>margins, water users and cultural values.</p> <p>ii the location, scale, construction and environmental effects of stormwater infrastructure and the extent to which the stormwater infrastructure contributes to amenity, recreational, cultural, ecological and climate values in addition to its engineering purpose (any financial contribution or</p> <p>iii development contribution required for any offsite stormwater quality and quantity treatment.</p> <p>(l) Amendments may be required across the IPI to address the relief sought.</p>	
S41.6	Entire IPI	Support and seek amendment	<p>Amend the IPI to:</p> <p>(a) Include a policy and amend relevant rules to require hydrological controls for use, development, and subdivision of land (Policy FW.3(j))</p> <p>(b) Insert the definition of hydrological controls from the Proposed RPS Change 1.</p> <p>(c) Amendments may be needed in multiple chapters.</p>	<p>Greater Wellington acknowledges and supports the introduction of objectives, policies, and rules for hydraulic neutrality to apply to all development enabled and provided for under the IPI (for example, SUB-GEN-O7, SUB-GEN-P13 and SUB-GEN-R2A). These provisions support implementation of the recommendations in Te Whaitua te Whanganui-a-Tara Implementation Programme and Te Mahere Wai o Te Kāhui Taiao. Stormwater runoff is likely to increase as a result of the IPI due to intensification and greater levels of impervious surfaces. Greater Wellington would like to see further amendments to require hydrological controls to manage potential increases in stormwater runoff quantity (flows and volumes). Hydrological controls are broader than stormwater neutrality and include measures to control a range</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				of flows and volumes to manage both flooding and ecosystem health.
S41.7	Entire IPI	Support and seek amendment	Ensure that density is appropriately managed within areas identified as experiencing 0.5 – 2 m inundation on the 'Regional Exposure Assessment 1% AEP' map.	Areas identified for intensification are generally not within areas of potential flood hazard as defined by UHCC 100-year Flood Extent Overlay. However, Greater Wellington's Regional Exposure Assessment 1% AEP shows a number of areas identified for intensification where there is a degree of risk. Any intensification in flood hazard zones will impact Greater Wellington's ability to discharge its flood risk management functions. Increasing densities within the Te Awa Kairangi / Hutt River flood plain will result in an increase to the vulnerability of people and property. An increase in vulnerability means an increase in risk. Densities proposed within much of the Te Awa Kairangi / Hutt River floodplain may increase this risk to significant. GWRC considers floodplain management can be considered as a qualifying matter under s771 of the Act.
S41.8	Entire IPI	Support and seek amendment	Ensure the District Plan provides for the management of development in areas at risk from natural hazards.	Greater Wellington broadly supports the intensification policies as they relate to natural hazards. We note the existing qualifying matter provisions, including natural hazard provisions will continue to apply to subdivision, use and development within hazard-prone areas in this IPI.
S41.9	Entire IPI	Support and seek amendment	Amend the IPI to: (a) Incorporate policies and rules to require improved water use efficiency for new developments. (b) Incorporate subdivision standards to require alternative water supplies for non-potable use i.e., roof water capture in new developments.	Urban development will increase demand for water supply for both potable and non-potable use. As the effects of climate change become more evident, changes in weather patterns may impact the availability of water sources and equally the demand for water. Proposed RPS Change 1 (Policies FW.2 and FW.3 in particular) seeks to manage pressures on existing water supplies and requires district plans to include provisions that improve the efficiency of end of use of water and require alternate water supplies for non-potable use in new developments. Additionally, Policy FW.5 requires consideration of how climate change may

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			<p>(c) Require new development to ensure adequate available water supply in a changing climate now and into the future.</p> <p>It is anticipated that amendments would be incorporated into multiple chapters.</p>	<p>impact water supply, including water availability and water demand.</p>
S41.10	Entire IPI	Support and seek amendment	<p>Include policies which seek to improve climate resilience of urban areas through measures identified in Policy CC.14 of Proposed RPS Change 1.</p> <p>Include policies and rules for new development areas that require the development to include actions and initiatives that improve climate resilience.</p> <p>Include matter of control or discretion in relevant rules that considers the extent to which the development within the design will improve climate resilience.</p>	<p>Given the future challenges posed by climate change, it is essential that urban development and intensification focuses on ensuring urban areas are resilient to the negative effects of climate change, such as lower rainfall, warmer urban areas, and more severe storm and hazard events.</p> <p>Greater Wellington seeks for the District Plan to have regard to Proposed RPS Change 1 Policies CC.4 and CC.14.</p>
S41.11	Entire IPI	Support and seek amendment	<p>Incorporate the following provisions (or amendments to existing provisions) across the District Plan:</p> <p>(a) Objective for the transport system to reduce dependence on fossil fuels and private vehicles recognising contributing to reduction in GHG emissions (Proposed RPS Change 1 Objective CC.3).</p>	<p>Greater Wellington considers there is a role for additional provisions in the IPI to have regard to Proposed RPS Change 1 direction in providing for urban intensification and development.</p> <p>The relevant Proposed RPS Change 1 policies are:</p> <ul style="list-style-type: none"> • Policies CC.1, CC.2, CC.3, CC.9, CC.10, 7, 57 and 58. See the submission for further detail.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>(b) Objective for new subdivision, use and development to minimise reliance on private vehicles and maximise use of public transport and active transport modes.</p> <p>(c) Policy that sets out a preference for freight distribution centres and high trip generating activities to locate in areas that are in close proximity to efficient transport networks.</p> <p>(d) Policy that enables the development of zero and low carbon and public transport infrastructure (i.e., charging stations, park, and ride facilities).</p> <p>(e) Rules to permit the development of appropriate zero carbon, public transport, and active transport infrastructure.</p> <p>(f) Policy that requires the provision of infrastructure in subdivision development that supports modal shift and consideration of how design can reduce greenhouse gas emissions.</p> <p>(g) Rule and associated standard that requires end of trip cycling facilities for staff (showers and lockers). The standard should be scaled for the</p>	

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>number of staff cycle parks provided.</p> <p>(h) Amend/include standards to require EV or e-bike charging stations, including for residential development.</p> <p>(i) Amend/include standards that specify requirements for safe cycle lanes, pedestrian crossings, cycle parks.</p> <p>(j) Matter of control or discretion for subdivision, comprehensive housing development and commercial activity rules (and similar) a requirement to consider the extent to which the development provides for zero or low carbon, public and active transport modes.</p> <p>(k) Include provisions to prescribe thresholds for when consent applicants must prepare travel demand management plans (integrated transport assessments). The thresholds can be size of the subdivision, number of dwellings, people, floor size of retail development etc. It should apply to residential, education, office, industrial, community, entertainment and other land use activities that could generate higher private vehicle and freight travel. Provisions should also require that travel demand</p>	

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>management plans include measures to reduce reliance on private vehicles and encourage modal shift to low carbon, active or public transport options.</p>	
S41.12	Entire IPI	Support and seek amendment	<p>Amend the IPI as necessary to have regard to Proposed RPS Change 1 Policy CC.7 and Policy CC.12:</p> <p>(a) Include policy that seeks nature-based solutions when providing for new infrastructure and in new developments, such as the use of green infrastructure.</p> <p>(b) Permit the development of green infrastructure in appropriate locations and subject to necessary controls, i.e., planting works undertaken by regional council.</p> <p>(c) As a matter of control or discretion for subdivision include the extent to which the design protects, enhances, restores, or creates nature-based solutions to manage the effects of climate change, or similar.</p> <p>(d) Include provisions for recognising the functions of the ecosystems providing nature-based solutions to climate change and avoid adverse effects of subdivision, use and development on</p>	<p>Proposed RPS Change 1 includes a number of provisions that recognise nature-based solutions are an integral part of the climate change mitigation and adaptation response required in the region and also provide a number of other benefits for indigenous biodiversity and community well-being. Nature-based solutions are defined as 'actions to protect, enhance or restore natural ecosystems, and the incorporation of natural elements into built environments, to reduce greenhouse gas emissions and/or strengthen the resilience of humans, indigenous biodiversity and the natural environment to the effects of climate change...'. Natural nature-based solutions already exist and perform functions that support solutions to climate change. These areas are to be mapped by Greater Wellington by June 2024. District Plans should avoid adverse effects on ecosystems providing nature-based solutions to have regard to Policy CC.12 in Proposed RPS Change 1.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>their functions, including before they are mapped. Policies should:</p> <ul style="list-style-type: none"> i direct the protection of areas that already perform a function as a nature based solution, including the many wider benefits these can have and ii encourage the restoration of nature-based solutions. <p>(e) Amendments may be necessary across the Energy, Infrastructure and Transport, Natural Hazards, and Subdivision provisions.</p>	
S41.13	Entire IPI	Support and seek amendment	<p>Amend the intensification Planning Instrument as necessary to have regard to Proposed RPS Change 1 Policy CC.8:</p> <p>(a) Identify the type and scale of activities where reducing greenhouse gases rather than offsetting must occur and</p> <p>(b) Include objectives, policies, rules to require greenhouse gases to be reduced rather than offset for the type and scale of activities identified.</p>	<p>There is a role for the IPI to include additional provisions to have regard to the following RPS Change 1 policy: Policy CC.8: Prioritising greenhouse gas emissions reduction over offsetting – district and regional.</p>
S41.14	Renewable Energy	Support	<p>Retain renewable energy generation provisions as notified.</p>	<p>Greater Wellington supports the existing renewable energy generation provisions in the District Plan and the amendments proposed in the Intensification Planning Instrument.</p>
S41.15	Entire IPI	Support and seek amendment	<p>Include direction in the District Plan, including infrastructure and subdivision</p>	<p>Greater Wellington considers that the District Plan should specifically provide for approved de-centralised alternative</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>provisions, to provide for de-centralised wastewater re-use and treatment (of grey and black water) and disposal using approved alternative wastewater systems (but not septic tanks, due to their existing issues with contamination and leaching) anywhere where there are constraints on the existing network capacity, as well as where connections are not available. Where connections are available and there is network capacity, a connection to the wastewater network should still be required.</p> <p>This includes any necessary consequential amendments to provide this direction.</p>	<p>wastewater re-use and treatment (of both grey and black water) systems anywhere where there are constraints on the existing network capacity, as well as where connections are not available. Alternative wastewater treatment options often reduce potable water use significantly. Reducing pressure of new development on the wastewater network may also make intensification in some areas with existing network capacity constraints more feasible. Relevant direction from the operative RPS includes policies 16 and 45. Relevant direction from Proposed RPS Change 1 includes policies FW.2, FW.3 and FW.5, CC.14 and 42(r), FW.5 and 58.</p>
S41.16	Entire IPI	Support and seek amendment	Amend to apply setbacks to all waterbodies, and re-assess the areas identified for intensification as necessary.	Qualifying Matter Area - One of the qualifying matters is “The areas within 20 metres of the bank of any waterbody with an average width of 3 metres or more”. Greater Wellington notes that applying only to waterbodies 3m wide or greater would have limited application, and that further protection of riparian margins is necessary to have regard to Proposed RPS Change 1.
S41.17	Entire IPI	Support	Retain UFD-O3, UFD-P2, and amendments to existing Strategic Direction relating to Residential as notified.	Encouraging high density housing (including enabling building heights up to 26 metres) where it is proximate and within walking distance to train stations in Upper Hutt City will help us meet the goals set out in the Wellington Regional Public Transport Plan (RPTP).
S41.18	Entire IPI	Support and seek amendment	Amend UFD-O1 (well-functioning urban environment) and other relevant policies in the IPI to include environmental components of wellbeing and have regard	Greater Wellington supports the introduction of objectives UFD-O1, CMU-O1, SUB-RES-O2, SUB-HRZ-01, GRZ-O2, HRZ-O1 to give effect to Policy 1 of the NPS-UD.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>to the articulation of the qualities and characteristics of well-functioning urban environments set out in Objective 22 of Proposed RPS Change 1.</p> <p>Ensure all Zone provisions have regard to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1, by including necessary objectives, policies, permitted standards and rules that provide for these qualities and characteristics.</p>	<p>Greater Wellington seeks for the provisions of all relevant zones to contribute to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1. This includes (but is not limited to) urban areas that are climate resilient, contribute to the protection of the natural environment and transition to a low-emission region, are compact and well connected, support housing affordability and choice, and enable Māori to express their cultural and traditional norms.</p>
S41.19	Entire IPI	Support and seek amendment	<p>Incorporate the following provisions (or amendments to existing provisions) across the District Plan:</p> <p>(a) Include an objective that mana whenua values relating to indigenous biodiversity are recognised and involvement in decision making and management is supported.</p> <p>(b) Include policy that requires mana whenua involvement in the mapping of indigenous biodiversity, including to identify taonga species.</p> <p>(c) Include policy to enable mana whenua to undertake customary activities in accordance with tikanga such as customary harvest of mahinga kai</p>	<p>There is a role for additional provisions in the IPI to have regard to Proposed RPS Change 1 direction in providing for urban intensification and development.</p> <p>The relevant Proposed RPS Change 1 policies are:</p> <ul style="list-style-type: none"> • Policy IE.1: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity – district and regional plans • Policy IE.2: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity – consideration. See submission for reasoning.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>species.</p> <p>(d) Include policy to support provision of access to indigenous biodiversity sites.</p> <p>(e) Include permitted activity rules for the cultural harvesting of mahinga kai, for example indigenous vegetation removal.</p> <p>(f) In relevant rules, for example indigenous vegetation clearance, include as a matter of control or discretion, the adverse effects on mahinga kai, other customary uses, and access for these activities.</p> <p>(g) Provisions could require management plans for managing offset biodiversity areas and managing effects on significant areas. Monitoring requirements would form part of these plans and plan direction could encourage the adoption of matauranga Māori in monitoring of indigenous species in relevant circumstances.</p>	
S41.20	Entire IPI	Support and seek amendment	<p>Incorporate the following provisions (or amendments to existing provisions):</p> <p>(a) A new policy (or amend existing policy) to protect the values of the natural features and landscapes when providing for subdivision.</p>	<p>Greater Wellington supports subdivision, use or development where natural features and landscapes can be protected, provided any adverse effects on their values are minimised. Greater Wellington acknowledges that the Operative Plan contains provisions to manage effects on natural features and landscapes. However, it is not currently clear whether the</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			(b) Amend existing policy to provide direction around minimising the effects of subdivision, use and development on the values of natural features and landscapes.	existing provisions will ensure these values are protected from the scale of intensification enabled by the IPI, to give effect to Policy 26 of the Operative Regional Policy Statement.
S41.21	High Density Zone	Support	Retaining Heading and Background for Subdivision in the High Density Residential Zone as notified.	Heading and Background for Subdivision in the High Density Residential Zone - Linkages to Silverstream Railway Station being required in the St Patrick's Estate Precinct, and Higher density residential development being provided for within walkable catchments of public transport centres and major transport nodes will help to meet goals set out in the Regional Public Transport Plan; such as our target of a 40% increase in mode shift to public transport by 2030. See submission for full reasoning.
S41.22	SUB-HRZ-03	Support	Retain SUB-HRZ-03 as notified.	SUB-HRZ-03 - High quality intensive residential development being provided for in close proximity to rapid transport stops will help to meet goals set out in the Regional Public Transport Plan.
S41.23	SUB-HRZ-P2	Support	Retain SUB-HRZ-P2 as notified.	Wider adoption of public transport through the increase of density along public transport corridors and within walkable catchments of centres will help to meet goals set out in the Regional Public Transport Plan.
S41.24	SUB-HRZ-P4	Support	Retain SUB-HRZ-P4 as notified.	Maintaining and enhancing pedestrian facilities established within a walkable distance to urban railway stations and the centre zones to increase walking accessibility and safety will help to meet goals set out in the Regional Public Transport Plan.
S41.25	SUB-HRZ-P5	Support	Retain SUB-HRZ-P5 as notified.	Providing for the efficient function of multimodal transport options within the road corridor within a walkable distance to

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				urban railway stations and centre zones will help to meet goals set out in the Regional Public Transport Plan.
S41.26	SUB-HRZ-P6	Support	Retain SUB-HRZ-P6 as notified.	Enabling and encouraging high density residential subdivision and development that is within a minimum of 800m walkable distance from urban railway stations will help to meet goals set out in the Regional Public Transport Plan.
S41.27	SUB-HRZ-P9	Support	Retain SUB-HRZ-P9 as notified.	Medium and high density residential subdivision, use and development within the St Patrick's Estate Precinct providing pedestrian linkages to Silverstream Railway Station will help to meet goals set out in the Regional Public Transport Plan. All new developments should be designed with public transport and multi-modal travel in mind to ensure residents and visitors are able to use modes other than private vehicles. All new developments should be fully accessible for buses and have adequate road space for associated bus infrastructure.
S41.28	Entire IPI	Support	Retain the following provisions as notified: High Density Residential Zone background, HRZ-PREC2-P1, and Precinct description (Precinct 2 St Patrick's Estate Precinct, SUB-HRZ-P9.	<p>Linkages to Silverstream Railway Station being required in the St Patrick's Estate Precinct, and higher density residential development being provided for within walkable catchments of train stations will help to meet goals set out in the Regional Public Transport Plan. All new developments should be designed with public transport and multi-modal travel in mind to ensure residents and visitors are able to use modes other than private vehicles. All new developments should be fully accessible for buses and have adequate road space for associated bus infrastructure.</p> <p>Medium and high density residential subdivision, use and development within the St Patrick's Estate Precinct providing linkages to Silverstream Railway Station being required in the St Patrick's Estate Precinct, and higher density residential development being provided for within walkable catchments of</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				train stations will help to meet goals set out in the Regional Public Transport Plan. All new developments should be designed with public transport and multi-modal travel in mind to ensure residents and visitors are able to use modes other than private vehicles. All new developments should be fully accessible for buses and have adequate road space for associated bus infrastructure.
S41.29	DC-P3	Support and seek amendment	Amend policy DC-P3 to ensure the subdivider or developer is paying their fair share of new utility services and facilities as outlined in the Stormwater Management Plan.	Strongly support the amendment of the financial contributions provisions to include urban development infrastructure. We also support those financial contributions received for water, wastewater, stormwater, or transport infrastructure being used to address the specific effects generated by a land use or subdivision for a specific purpose like upgrades to the water, wastewater or stormwater networks. Greater Wellington considers that a further amendment to policy DC-P3 would have regard to Proposed RPS Change 1 direction.
S41.30	Earthworks	Support and seek amendment	Amend existing provisions, or insert new provisions, to include: (a) Matters of control or discretion regarding the potential for adverse effects on water quality of any waterbody, wahi tapu, wahi taonga and habitat of any significant indigenous species and (b) Requirements for the provision of an erosion and sediment control plan with a consent application for earthworks.	Earthworks - Greater Wellington acknowledges the provisions in the operative district plan and considers stronger direction is required to mitigate the adverse effects of earthworks on water quality. Greater Wellington seeks amendments which more clearly seek to minimise the potential for sediment to enter waterbodies. Additionally, we wish to ensure this potential effect is assessed in any resource consent application involving disturbance works, including vegetation clearance

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			(c) Amend the standards for Earthworks permitted activities to include requirements for setbacks from waterbodies and erosion and sediment control measures to be effectively utilised to prevent sediment entering waterways and stormwater networks. (d)	
S41.31	Papakāinga	Support	Retain papakāinga provisions as notified, subject to submissions made by mana whenua.	Strongly support the introduction of a new chapter into the district plan to address papakāinga and the amendments that provide for papakāinga development, including adding a definition of papakāinga. We support enabling papakāinga across the district rather than being confined to land held under Te Ture Whenua Māori Act 1993.
S41.32	Not stated	Support and seek amendment	Incorporate the following provisions (or amendments to existing provisions) across the District Plan: (a) Include policies, rules and methods that protect indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development. (b) Include policy to direct the circumstances when and how biodiversity offsetting can be used, and if used, the outcome must be at least 10% biodiversity gain or benefits. Refer to an appendix for full details.	The mandatory enabling building and subdivision provisions under the IPI will place increased development pressure on indigenous ecosystems and habitats with significant indigenous biodiversity values. We support the intention to try and provide some protection through the introduction of the Indigenous Biodiversity Precinct, however we do not believe 'encouraging' the protection of indigenous biodiversity values will provide the necessary protection, nor align with direction of the RPS which has been operative since 2013. The Proposed RPS Change 1 also includes an updated Policy 24 which requires policies, rules, and methods to protect to be in place by 30 June 2025. The submitter acknowledges Upper Hutt City Council's intention to notify a future plan change to implement protection for these areas, but we consider areas of significant indigenous biodiversity represent an important qualifying matter for urban intensification and should be included as part of the IPI.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			(c) Include an appendix which sets out the limitations where biodiversity offsetting is not appropriate as described in Policy 24 and Appendix 1A of the Proposed RPS Change 1.	
S41.33	GRZ-P1B HRZ-P1	Support and seek amendment	Retain the inclusion of GRZ-P1B and HRZ-P1 including historic heritage as a qualifying matter. Include a schedule of Sites and Areas of Significance to Māori in the IPI.	Concerned about the absence of Sites and Areas of Significance to Māori identified in the District Plan meaning they remain unidentified and unprotected under the existing qualifying matter historic provisions. They are at risk from the adverse effects of development.
S41.34	Entire IPI	Support and seek amendment	Include matter of control or discretion to require proper disposal of building waste when redeveloping sites/infill development (e.g., demolition).	Urban intensification will require infill development. This means it will be crucial to ensure the disposal of building waste is properly managed, to give effect to Policy 34 of the Operative Regional Policy Statement.
Submitter 42: Jaap Knegtmans				
S42.1	Entire IPI	Oppose	To meet with Upper Hutt residents and the relevant Central Government officials in person (particularly those within the high density boundaries identified) and dialogue with them to discuss the associated issues, risks and opportunities.	The areas identified need to be reviewed - the zone encompasses a large area of Upper Hutt. Also, given our city is located along the earthquake faultline, how wise is it to have no height limits within the central business district? Open dialogue, creative ideas and better city planning with the wider community is what's needed. Let's go back to the drawing board while we can and develop something together which all Upper Hutt residents can be proud of.
Submitter 43: Kiwirail				
S43.1	Definitions	Support and seek amendment	Add the following to the definition for 'qualifying matter area': ' <u>(s) areas adjacent to the railway corridor.</u> '	Definition for Qualifying Matter Area. The submitter supports the inclusion of a new definition of a qualifying matter area but seeks the inclusion of the railway corridor as a qualifying matter. Request that express reference to the railway corridor is

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				included in the definition of a qualifying matter area. See the submission for discussion and reasoning.
S43.2	Definitions	Support	Retain the definition for 'reverse sensitivity' as notified.	The submitter supports the definition for 'reverse sensitivity'.
S43.3	Definitions	Seek amendment	Add a new definition to Chapter 3.1 for 'activities sensitive to noise' as follows: <u>'Activities sensitive to noise means any residential unit, minor residential unit, family flat, rest home, retirement village, marae, community care housing, early childhood centre, educational facility, kōhanga reo, hospital, and healthcare facilities with an overnight stay facility.'</u>	Seek new definition for 'Activities sensitive to noise'. The submitter notes this new definition is necessary to provide clarity to the new noise and vibration provisions sought by the submitter. See the submission for discussion and reasoning.
S43.4	UFD-04	Support	Retain UFD-04 as notified.	KiwiRail supports the objective as they consider that it appropriately provides for the recognition of qualifying matters at the strategic level of the District Plan. In particular, KiwiRail supports the reference to qualifying matters which are necessary to ensure the safe and efficient operation of nationally significant infrastructure. See the submission for discussion and reasoning.
S43.5	UFD-P2	Support	Retain UFD-P2 as notified.	The submitter supports the proposed new policy - specifically the need to avoid inappropriate densities of buildings and development within areas where a qualifying matter applies. See the submission for discussion and reasoning.
S43.6	UFD Strategic Direction	Support and seek amendment	Amend UFD - Residential as follows: <u>'Within the General Residential Zone and High Density Residential Zone</u> existing qualifying matters may limit the amount of permitted medium density development possible on an allotment.'	Strategic Direction. The submitter supports the reference in the strategic direction for residential activities that qualifying matters may limit the amount of permitted development. However, the submitter seeks an amendment to remove reference only "existing" qualifying matters in order to enable application of all relevant qualifying matters, and also considers

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				reference should be included to the High Density Residential Zone as there may equally be qualifying matters that apply within that zone and limit the development potential. See the submission for discussion and reasoning.
S43.7	UFD-CM-01	Support	Retain UFD-CM-01 as notified.	The submitter supports the objective - specifically, the reference to the provision for "social, economic and cultural wellbeing, and for their health and safety, now and into the future" in alignment with Objective 1 of the NPS-UD.
S43.8	SUB-HRZ-03	Support and seek amendment	Amend SUB-HRZ-03 as follows: 'High quality intensive residential development is provided in close proximity to rapid transport stops, community facilities and commercial activities in multistorey flats and apartments <u>in a manner that ensures the ongoing safe and efficient operation of transport networks and minimises potential reverse sensitivity effects.</u> '	SUB-HRZ-03. The submitter generally supports the intent of the objective to locate urban development around transport nodes, but the submitter considers it is important that such development is undertaken in a way that ensures the safe and efficient operation of the transport network and manages potential reverse sensitivity effects on existing lawfully established infrastructure. See the submission for discussion and reasoning.
S43.9	SUB-HRZ-P4	Support and seek amendment	Amend SUB-HRZ-P4 as follows: 'Recognise the benefits of wider adoption of public transport through the increase of density along public transport corridors and within walkable catchments of centres <u>while ensuring development is undertaken in a manner that ensures the ongoing safe and efficient operation of transport networks and minimises potential reverse sensitivity effects.</u> '	The submitter recognizes the benefits of co-locating urban development near transport nodes. However, the submitter considers an amendment is required to the policy to ensure that such development minimizes potential reverse sensitivity effects on the existing transport network. See the submission for discussion and reasoning.
S43.10	SUB-HRZ-S2(6)	Support	Retain SUB-HRZ-S2(6) as notified.	SUB-HRZ-S2(6). The submitter supports the inclusion of an access standard relating to buildings and structures at the

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				intersection of a rail level crossing. The submitter considers it is appropriate to prevent buildings or other obstructions which block sight lines from being erected in order to ensure the ongoing safety of the rail corridor.
S43.11	HRZ-R1	Support	Retain HRZ-R1 as notified.	HRZ-R1. The submitter supports Rule 1 to the extent that it applies to the standards in the GRZ zone. In particular, the submitter supports the application of the increased setback for buildings adjacent to the rail corridor sought to be included in the GRZ also being applied in the High Density Residential zone.
S43.12	MUZ-P5	Support	Retain MUZ-P5 as notified.	MUZ-P5. The submitter supports the policy and considers it is important to ensure that built development occurs in a way that contributes to a safe urban environment which also includes managing the interface between urban development and infrastructure, such as the rail corridor.
S43.13	Rules LCZ-S2, MUZ-S3 TCZ-S3 and CCZ-S2, NCZ-SSC-S1, GRZ-S3	Support and seek amendment	Amend setbacks in LCZ-S2, MUZ-S3 TCZ-S3 and CCZ-S2, NCZ-SSC-S1, GRZ-S3, and any other zones affected by the IPI that adjoins the railway corridor to include a new permitted activity standard that requires a 5.0m building setback from boundaries adjoining the rail corridor, and a new matter of discretion that addresses the location and design of the building as it relates to the ability to safely use, access and maintain buildings without requiring access on, above or over the rail corridor. See the submission for specific requested amendments.	The submitter seeks a new permitted activity standard requiring buildings and structures to be setback 5m from a boundary with a railway corridor. A larger setback is required to ensure people can use and maintain their land and buildings safely, without interference with the railway corridor. The submitter also seeks a new matter of discretion to be added for activities that do not comply with the requested new permitted activity standard requiring buildings and structures to be setback at least 5m from the railway corridor to ensure specific consideration is given to the need to ensure the safe use of buildings without interference with the rail corridor. See the submission for discussion and reasoning.
S43.14	Objectives and policies in NCZ,	Seek amendment	Insert a new objective and policy into the NCZ, LCZ, MUZ, TCZ, CCZ and any other	The submitter seeks the inclusion of a new objective and policy into each of the relevant zones adjoining the railway corridor

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
	LCZ, MUZ, TCZ, and CCZ		<p>zones affected by the IPI that adjoins the railway corridor as follows:</p> <p><u>OX. Built development is of an appropriate scale and location to minimise risks to public health and safety.</u></p> <p>Add new policy as follows: <u>PX. Require activities adjacent to regionally significant network utilities to be setback a safe distance in order to ensure the ongoing safe and efficient operation of those utilities and the communities who live adjacent to them.</u></p> <p>Alternatively, the existing objectives and policies in each zone be amended to provide appropriate policy direction to manage the safety of the rail corridor and the communities who live nearby.</p>	<p>that are affected by the IPI to ensure the interface between urban development and the rail corridor is appropriately managed. The submitter considers this is appropriate to ensure the setback rules give effects to the objectives and policies of the District Plan. In the alternative, the submitter seeks that the existing objectives and policies in each zone be amended to provide appropriate policy direction to manage the safety of the rail corridor and the communities who live nearby.</p>
S43.15	Noise	Seek amendment	<p>(1) Add a new objective and policy to the Noise chapter as follows: <u>NOISE-O2 Avoid where practicable, or otherwise remedy or mitigate, adverse effects of subdivision, use and development on regionally significant network utilities.</u></p> <p>(2) Add new policy as follows: <u>NOISE-P3 Require activities to be appropriately located and/or designed to avoid where practicable or otherwise remedy or mitigate reverse</u></p>	<p>Noise-O2 and Noise-P3. The submitter seeks a new objective and policy be included in the district-wide Noise Chapter to provide appropriate policy direction on the need to manage new and altered activities sensitive to noise near the railway corridor in addition to the existing policy direction which already seeks to ensure a high quality environment is created by protecting amenity values. In the alternative and to the extent the noise and vibration rules are included in each relevant zone, amend the existing objectives and policies (including NCZ-P2, LCZ-P2, MUZ-P2 and TCZ-P2) to recognize the need to minimise reverse sensitivity effects on infrastructure. See the submission for discussion and reasoning.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>sensitivity effects on regionally significant network utilities.</u></p> <p>(3) In the alternative and to the extent the noise and vibration rules are included in each relevant zone, amend the existing objectives and policies (including NCZ-P2, LCZ-P2, MUZ-P2 and TCZ-P2) to recognize the need to minimise reverse sensitivity effects on infrastructure.</p>	
S43.16	Noise	Seek amendment	Insert new Permitted Activity and Restricted Discretionary Rule into the Noise chapter to manage new buildings and alterations to existing buildings containing an activity sensitive to noise in all zones. See the submission for the requested new rules.	New Noise Rule. The submitter seeks a new permitted activity rule be included in the district-wide Noise chapter requiring any activity sensitive to noise to comply with noise and vibration standards. The submitter also seeks a new restricted discretionary activity (and matters for consideration) for any activities that do not comply with the permitted activity rule. Alternatively, KiwiRail seeks this rule be included in each of the relevant zones adjoining the railway corridor. See the submission for discussion and reasoning.
S43.17	Noise	Seek amendment	<p>1. Add a new permitted activity rule into the Noise chapter, or alternatively into each relevant zone adjoining the railway corridor that:</p> <p>(a) Specifies the maximum railway noise level (measured in LAeq(1h)) that any new building or alteration to an existing building that contains an activity sensitive to noise must meet be designed to meet.</p>	NOISE S7 and NOISE MC3. The submitter seeks a new noise insulation and ventilation standard to apply to new and altered activities sensitive to noise in all zones adjacent to the railway corridor to manage potential reverse sensitivity effects and adverse health and amenity effects on communities adjacent to the railway corridor. Alternatively, the submitter seeks this standard be included in each of the relevant zones adjoining the railway corridor. See the submission for discussion and reasoning.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>(b) Requires that any new building or alteration to an existing building that contains an activity sensitive to noise is at least 50 metres from any railway network and is designed so that a noise barrier completely blocks line-of-sight from all parts of doors and windows to all points 3.8 metres above railway tracks.</p> <p>(c) specifies the assumed level of noise from the railway track depending on the distance between the railway track and the new or altered building.</p> <p>(d) Requires new internal ventilation that provides air flow of at least 6 air changes per hour, provides relief for equivalent volumes of spill air, cooling, and heating of rooms between 18 degree C and 25 degrees C, and the noise emission limit for the heating/cooling or ventilation system can emit. See the submission for the wording of all requested standards.</p> <p>2. Add new matters for consideration where the requested new standards are not met. See the submission for</p>	

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			all requested matters for consideration.	
S43.18	Noise	Seek amendment	<p>Add a new standard and matters for consideration into the Noise chapter or alternatively within each of the relevant zones adjoining the rail corridor as follows:</p> <p>New Noise standard: <u>NOISE-S8 Indoor railway vibration</u></p> <p><u>1. Any new buildings or alterations to existing buildings containing a noise sensitive activity, within 60 metres of the boundary of any railway network, must be protected from vibration arising from the nearby rail corridor.</u></p> <p><u>2. Compliance with standard (1) above shall be achieved by a report submitted to the council demonstrating compliance with the following matters:</u></p> <p><u>(a) the new building or alteration or an existing building is designed, constructed and maintained to achieve rail vibration levels not exceeding 0.3 mm/s vw,95 or</u></p> <p><u>(b) the new building or alteration to an existing building is a single-storey framed residential building with: .i. a constant level floor slab on a full-surface vibration isolation bearing with natural frequency not exceeding 10 Hz, installed in accordance with the supplier's instructions and recommendations; and</u></p>	<p>NOISE S8 and NOISE MC4. The submitter seeks a new vibration standard to apply to new and altered activities sensitive to noise in all zones adjacent to the rail corridor to manage potential reverse sensitivity effects and adverse health and amenity effects on communities adjacent to the rail corridor. Alternatively, KiwiRail seeks this standard be included in each of the relevant zones adjoining the rail corridor. See the submission for discussion and reasoning.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>ii. <u>vibration isolation separating the sides of the floor slab from the ground; and</u> iii. <u>no rigid connections between the building and the ground.</u></p> <p>Add new matters for consideration as follows: <u>Matters for consideration</u> <u>NOISE-MC4 Rail vibration</u> <u>(a) the effects generated by the standard(s) not being met.</u> <u>(b) location of the building.</u> <u>(c) the effects of any non-compliance with the activity specific standards.</u> <u>(d) special topographical, building features or ground conditions which will mitigate vibration impacts.</u> <u>(e) the outcome of any consultation with KiwiRail.</u></p>	
S43.19	TP-S1(5) SUB-HRZ-S2(6) SUB-CMU-S1(5)	Support	Retain TP-S1(5), SUB-HRZ-S2(6), SUB-CMU-S1(5) as notified.	TP-S1(5), SUB-HRZ-S2(6), SUB-CMU-S1(5). The submitter supports the inclusion of a standard in the Transport Chapter and the subdivision provisions relating to buildings and structures at the intersection of a rail crossing. The submitter considers it is appropriate to prevent buildings or other obstructions which block sight lines from being erected in order to ensure the ongoing safety of the rail corridor.
Submitter 44: Jonathan Board				
S44.1	Not stated	Seek amendment	Remove the Southern Growth Area from consideration	The Southern Growth area should be removed from consideration. The development of this site will fundamentally change the character of the area, destroy habitat and scenic landscape, and cause increased flooding for existing residents.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
Submitter 45: Beatrice Serrao				
S45.1	High Density Residential Zone	Oppose	Unsure what you mean by this. I feel that those forms are purposely so hard to interpret and understand.	No at a such large high density area!!!! No Upper Hutt will turn into a Bronx. The high density area is excessively large. 6 storeys high buildings are going to be such an eye sore. Build your skyscrapers near the city centre!
Submitter 46: Blue Mountains Campus Development Limited Partnership				
S46.1	DEV1-P8	Seek amendment	Amend the explanatory text of Policy DEV1-P8 as follows: <i>The Wallaceville Structure Plan identifies the Gateway Precinct as the location of a local centre incorporating retail, commercial and above ground level residential uses. It also establishes intention and outcome expectations based on an analysis of site values, constraints, and opportunities. Requiring development to be consistent with the Structure Plan will ensure that future development of the local centre represents sustainable management of the land resource.</i>	Restricting residential development to above ground level is inconsistent with Objective DEV1-O1 and the Wallaceville Structure Plan itself. An amendment to the <u>explanatory text</u> of Policy DEV1-P7 is sought to remove reference to “above ground level” residential uses. This would ensure that the policy which provides for development that is “consistent with the Wallaceville Structure Plan” is properly reflective of the intentions that are specified in the Structure Plan.
S46.2	DEV1-R2	Seek amendment	Delete Rule DEV1-R2 and instead rely on the permitted activities provided by the underlying LCZ; or Amend Rule DEV1-R2 as follows: <i>Retail activity, restaurants, offices, early childhood centres, and residential accommodation above ground level on land identified in the Gateway Precinct of Wallaceville Structure Plan</i> If Rule DEV1-R2 is deleted, Rule DEV1-R6 will also need to be deleted.	Rule DEV1-R2 provides for the following permitted activities as a permitted activity in the Gateway Precinct: <i>Retail activity, restaurants, offices, early childhood centres, and residential accommodation above ground level on land identified in the Gateway Precinct of Wallaceville Structure Plan.</i> It is submitted that the rule constrains permitted activities on the site in a manner that is inconsistent with the underlying LCZ. The requirements of the NPS-UD are to provide for increased density and built form standards. Applying the LCZ directly, without Rule DEV1-R2 constraining some potential activities provided by the LCZ is consistent with the requirements of the NPSUD. As an alternative and consistent with the change sought

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				for Policy Dev1-P8, amend this permitted activity rule to remove the words “above ground level.”
S46.3	DEV1-S10	Seek amendment	Amend Standard DEV1-S10 to correct reference to COMZ-S6 and retain the existing intent of the standard.	This is an existing standard that notes that loading spaces required by COMZS6 do not apply to the floor area of residential activities in the Gateway Precinct. The IPI does not address or update this standard which will create a ‘broken’ linkage to a standard that will no longer exist.
S46.4	DEV1-S12	Seek amendment	Amend Standard DEV1-S12 to correct reference to COMZ-S8 and retain the existing intent of the standard in providing an exemption.	Standard DEV1-S12 provides an exemption for the Gateway Precinct from the screening standard of COMZ-S8. The IPI does not address or update this standard which will create a ‘broken’ linkage to a standard that will no longer exist.
S46.5	DEV1-S13	Seek amendment	Amend Standard DEV1-S13 to correct reference to COMZ-S9 and retain the existing intent of the standard in providing an exemption.	Standard DEV1-S13 provides an exemption for the Gateway Precinct from the screening standard of COMZ-S9. The IPI does not address or update this standard which will create a ‘broken’ linkage to a standard that will no longer exist.
S46.6	DEV1-R5	Seek amendment	Amend the restriction on notification from DEV-R5 as follows: <i>In respect of this rule, and subject to sections 95A(2)(b), 95A(2)(c), 95A(4) and 95C of the Act, an application which meets the relevant standards and terms will be decided without the need for public notification under section 95A and any application that is consistent with the Wallaceville Structure Plan without the need for limited notification under Section 95B and for new buildings within the heritage covenant area limited notification will only be served on Heritage New Zealand (unless</i>	The statement provides that limited notification is precluded where an application is consistent with the Wallaceville Structure Plan. The statement is therefore contingent on a subjective assessment of consistency which is inappropriate in attempting to provide for notification certainty.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<i>affected party approval is provided) under section 95B of the Act.</i>	
S46.7	DEV1-R6	Seek amendment	Amend Rule DEV1-R6 as follows: <i>Garden centres and all activities other than retail activity, restaurants, offices, early childhood centres, and residential accommodation above ground level and not otherwise provided for as non-complying in COMZ-R20 and COMZ-R21 in the Gateway Precinct of the Wallaceville Structure Plan Development Area. Correct references to COMZ-R20 and COMZR21.</i>	Amend Rule DEV1-R6 as follows: <i>Garden centres and all activities other than retail activity, restaurants, offices, early childhood centres, and residential accommodation above ground level and not otherwise provided for as non-complying in COMZ-R20 and COMZ-R21 in the Gateway Precinct of the Wallaceville Structure Plan Development Area. Correct references to COMZ-R20 and COMZR21.</i>
S46.8	High Density Residential Zone / Local Centre Zone	Seek amendment	Change the zoning of Lots 2, 3 and 252 of the Urban Precinct from High Density Residential Zone to Local Centre Zone.	The proposed HDRZ zoning unnecessarily limits the scope of activities on the site and is inconsistent with the direction of the NPS-UD. The site, as described by the Wallaceville Structure Plan envisages non-residential activities in the Urban Precinct. Provision for non-residential activities as a discretionary activity creates uncertainty in considering potential development options for the site.
S46.9	Gateway Precinct – Permitted activities	Seek amendment	As an alternative to changing the zoning of the site as outlined above: Provide for the permitted activities of the Gateway Precinct within Lots 2,3 and 252 of the Urban Precinct as part of the Wallaceville Structure Plan Development Area chapter; or Provide for the permitted activities of the Gateway Precinct within Lots 2,3 and 252 of the Urban Precinct as a new Precinct within the LCZ chapter.	As an alternative to changing the zoning of the site as outlined above: Provide for the permitted activities of the Gateway Precinct within Lots 2,3 and 252 of the Urban Precinct as part of the Wallaceville Structure Plan Development Area chapter; or Provide for the permitted activities of the Gateway Precinct within Lots 2,3 and 252 of the Urban Precinct as a new Precinct within the LCZ chapter.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S46.10	DEV1-S1	Seek amendment	Amend Standard DEV1-S1 to correct reference to GRZ-S1.	The standard relates to access requirements and applies in addition to the requirements of GRZ-S1. The reference to a standard in the GRZ is assumed to be incorrect and should reference the HDRZ.
S46.11	DEV1-S2	Seek amendment	Amend Standard DEV1-S2 to correct reference to GRZ-S4, make any other necessary consequential changes.	Standard DEV1-S2 outlines additional setback standards with reference to standard GRZ-S4. This standard will no longer be applicable. The IPI does not address or update this standard which will create a 'broken' linkage to a standard that will no longer exist.
S46.12	DEV1-S3	Seek amendment	Amend Standard DEV1-S3 to correct reference to GRZ-S5 or delete the standard.	Standard DEV1-S3 provides an exemption for the Urban Precinct from the outdoor living standard of GRZ-S5, particular to Comprehensive Residential Developments. Provisions relating to Comprehensive Residential Developments are being removed as part of the IPI. The IPI does not address or update this standard which will create a 'broken' linkage to a standard that will no longer exist.
S46.13	DEV1-S4	Seek amendment	Amend Standard DEV1-S4 to correct reference to GRZ-S7 or delete the standard.	Standard DEV1-S4 provides an exemption for the Urban Precinct from the building height standard of GRZ-S7, particular to Comprehensive Residential Developments. Provisions relating to Comprehensive Residential Developments are being removed as part of the IPI. The IPI does not address or update this standard which will create a 'broken' linkage to a standard that will no longer exist.
S46.14	DEV1-S5	Seek amendment	Amend Standard DEV1-S5 to correct reference to GRZ-S8 and retain the existing intent of the standard if necessary.	Standard DEV1-5 provides an exemption for the Urban Precinct from the sunlight access standard of GRZ-S8. The IPI does not address or update this standard which will create a 'broken' linkage to a standard that will no longer exist.
S46.15	DEV1-MC1	Seek amendment	Amend DEV1-MC1 to correct references to provisions within the GRZ.	DEV1-MC1 sets out a range of matters of consideration for the assessment of resource consent applications. DEV1-MC1 refers

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				to a range of matters in the GRZ. The IPI does not amend these references and will therefore create a range of 'broken' linkages.
S46.16	Local Centre Zone	Seek amendment	Amend the introductory statement to make reference to the Wallaceville Structure Plan Development Area and the relationship between it and the zone chapter.	The LCZ zoning is the underlying zone to the Gateway Precinct and is proposed by this submission to be the underlying zone to parts of the Urban Precinct. The introduction to this zone should acknowledge the relationship with the Wallaceville Structure Plan Development Area.
S46.17	LCZ-R5	Seek amendment	Amend Rule LCZ-R5.1.a to provide an exemption for the Wallaceville Structure Plan Development Area.	The standard limits Commercial Services Activity to a gross floor area per tenancy of 250m ² . It is sought that an exemption be provided to this standard within the Wallaceville Structure Plan Development Area.
S46.18	LCZ-R10	Seek amendment	Amend Rule LCZ-R10.1.a to provide an exemption for the Wallaceville Structure Plan Development Area.	The standard limits Office Activity to a gross floor area per tenancy of 150m ² . It is sought that an exemption be provided to this standard within the Wallaceville Structure Plan Development Area.
S46.19	LCZ-S6	Seek amendment	Exempt the Gateway Precinct from the requirements of Standard LCZ-S6.	The existing Gateway Precinct provisions do not include noise insulation standards, only a ventilation standard. A continuation of that approach is sought.
S46.20	LCZ-S8	Seek amendment	Provide an exemption to the standard in relation to Lots 2, 3 and 252 of the Urban Precinct.	BMC is seeking to provide for a wide range of activities on its Blue Mountains Campus site in order to maximise its development potential. This is consistent with its current development objective under the Structure Plan, to promote the efficient utilisation of the site. These activities may be additional commercial or office activities, residential development, other compatible activities, or a mixture of activities. This submission therefore seeks that the zoning of the site (Lots 2, 3 and 252 of the Urban Precinct) be changed to a

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				Local Centre Zoning as an extension of the LCZ applicable to the Gateway Precinct.
S46.21	High Density Residential Zone	Seek amendment	BMC is actively planning future development for the balance of the site and is seeking to ensure that the District Plan provides for sufficient building heights and density of urban form, as required by the National Policy Statement for Urban Development (NPS-UD).	The provision for residential accommodation above ground level is inconsistent with Objective DEV1-O2 and the “intentions” for the Gateway Precinct specified for the area by the structure plan itself. The intention for the Gateway Precinct “includes provision for a range of residential housing types at a relatively high density, including duplexes, terraces and low rise apartments”. If the structure plan intends that duplexes and terrace housing units are provided in the area, then reference to residential above ground level should be removed.
S46.22	Local Centre Zone	Seek amendment	BMC also seeks that the District Plan provides for an appropriate range of activities to occur on the site so that development opportunities are not unnecessarily restrained.	The proposed LCZ provides for residential at ground level and removing this existing restriction would ensure consistency with the zoning that is proposed for the site. It would also give effect to the requirements of the NPS-UD in maximising development capacity and provide for an appropriate range of residential typologies, while not unnecessarily restricting development potential.
Submitter 47: Julie Cameron				
S47.1	High Density Residential Zone	Seek amendment	I seek that any new building of high density only be allowed within the city centre (Main St area) of Upper Hutt, not within family suburbs. No existing families should be "cramped" within their own home with sunlight affected, leading to unhealthy homes, leading to many leaving Upper Hutt. Don't let the proposed plan change affect the clean, green, Upper Hutt that families chose for more space, sun, and the suburbs.	The zoned areas of 'high density housing' proposed in Silverstream & Heretaunga areas or for any areas/suburbs in Upper Hutt that already have suitable family housing. These shouldn't have up to 20m+ high dwellings/apartments approved. High multi-storey apartments or dwellings are not suitable to be built in already established family suburbs such as Heretaunga. All high density housing and accommodation blocks should be suited within the Upper Hutt City Centre, above shops, surrounding areas behind the main street. Making the main street of Upper Hutt more viable with more foot traffic. High density housing is designed for within the city centre not the suburbs.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
Submitter 48: Silver Stream Railway Incorporated				
S48.1	Maps	Seek amendment	Change the zoning surrounding the Railway's Chalfont Road (Amberly Gardens), Kiln Street and Field Street boundaries from 'High Density Residential' to the zoning under the operative district plan or another zoning that is less enabling of housing such as 'General Residential'.	Protecting the societies' ability to continue to operate, maintain and enhance the railway facility, along with the protection of these existing activities from inappropriately located development, as well as seeking to ensure the safety and amenity of those parties occupying land adjacent to the railway's property. In the past the railway has been surrounded by industrial activities and open space land which were compatible with the railway operation. Any changes in land use must include provision to integrate any development with adjoining land use activities including measures to avoid, remedy or mitigate reverse sensitivity effects.
S48.2	High Density Residential Zone	Seek amendment	Implement a setback based on district plan noise standards to be confirmed via a noise assessment from the Chalfont Road (Amberly Gardens), Kiln Street and Field Street boundaries of the Railway in which residential development becomes a restricted discretionary activity whereby discretion is restricted to managing the effects of reverse sensitivity; and/or add requirements for adjacent residential properties to be double-glazed and ventilated to protect the Railway from reverse sensitivity effects and complaints related to noise.	SSR's primary concern around adjacent housing density and rezoning of land use from industrial to high density residential is reverse sensitivity effects arising from the Railway's operations and the potential for complaints from adjacent high density housing. For the purposes of this submission, we have only focussed on the housing density adjacent to the Railway premises adjacent to Chalfont Road (Amberly Gardens), Kiln Street and Field Street boundaries which should be made less enabling of development than provided for under Policy 3 of the National Policy Statement on Urban Development (NPS-UD). Qualifying Matters relevant to SSR include a matter of national importance under section 6 Resource Management Act (RMA) – being historic heritage and/or any other matter that makes higher density housing inappropriate in that area.
S48.3	Not Stated	Seek amendment	Require a "no complaints" covenant, where the provision of noise and vibration provisions are not met adjacent to the	As a network utility operator, SSR should be able to rely on the same established provisions provided to other network utility operators to protect against reverse sensitivity effects as

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			railway, like is already on the property titles on existing housing located next to the railway's boundary	outlined in the UHCC District plan. These include protections against complaints from neighbours of noise and air pollution that could be perceived as adverse by nearby sensitive activities such as residential activities, and that inappropriate development does not occur next to network utilities vulnerable to reverse sensitivities. Previous noise assessments of the railway have identified that operational noise beyond the railway boundary is above district plan limits for residential areas. New studies are being commissioned to complete these noise assessments along the railway boundary areas of the UHCC intensification plans. These studies are expected to show that operational noise of the railway would adversely affect residential activities in the proposed areas.
Submitter 49: Logan McLean				
S49.1	Maps	Seek amendment	Re-zone the Farrah's site to residential. Alternatively, do not support the surrounding impacted area to be re-zoned to high density until such time as all issues associated with this industrial zone have been resolved and UHCC is capable of enforcing the relevant provisions in the District Plan to protect the amenity value of the surrounding residential areas. Ensure that provisions in the District Plan are not relaxed around this area in regard to noise etc that impact on the amenity values of the neighbourhood.	It seems ridiculous to be considering intensification of housing around the Farrah's site in Kiln St when there are so many problems there already causing conflict with current residential areas. That industrial area needs to be re-zoned to residential.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
Submitter 50: Waka Kotahi				
S50.1	Entire IPI	Support and seek amendment	Amend the walkable catchment from the edge of the City Centre Zone, Town Centre Zone and rapid transit stops to a minimum of 800m, unless constrained by natural geographic barriers such as State Highway 2 / the Hutt River.	Waka Kotahi supports the provisions which enable six storey developments as a permitted activity within this catchment but is of the view that to realise the development capacity required by the National Policy Statement on Urban Development 2020 (NPS-UD) that the walkable catchment should be a minimum of 800m from the edge of the City Centre Zone, Town Centre Zone and rapid transit stops, unless constrained by natural geographic barriers such as State Highway 2 / the Hutt River.
S50.2	Entire IPI	Seek amendment	Develop a walkable catchment of between 200-400m around Local Centres to enable high density development within this catchment.	It is also noted that Upper Hutt City Council has proposed no walkable catchments supporting any of the other identified centres. Waka Kotahi considers that Council should have a long-term, enabling view of development. To this end, a walkable catchment of between 200-400m should be developed around Local Centres to enable high density development within this catchment.
S50.3	Financial Contributions	Support and seek amendment	Consideration be given to initiatives and/or infrastructure that supports mode shift.	Waka Kotahi supports the use of financial contributions as a financial tool to contribute towards public realm improvement projects, and seeks that consideration be given to initiatives and/or infrastructure that supports mode shift.
S50.4	Entire IPI	Seek amendment	That the IPI more fully recognise the role that safety and accessibility to active and public transport contribute towards the delivery of a well-functioning environment as per Policy 1 of the National Policy Statement Urban Development 2020 (NPS UD)	Waka Kotahi requests that the IPI more fully recognise the role that safety and accessibility to active and public transport contribute towards the delivery of a well-functioning environment as per Policy 1 of the National Policy Statement Urban Development 2020 (NPS UD). To this end, Waka Kotahi is also seeking that the transport and parking provisions are updated to require safe access standards for all direct accesses to the state highway network.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S50.5	Entire IPI	Support and seek amendment	Support with amendments and other consequential relief to ensure safety and accessibility to active modes and public transport are appropriately addressed in the IPI.	Waka Kotahi generally supports the IPI in implementing the increased urban densities required under the Medium Density Residential Standards (MDRS). However, Waka Kotahi requests that the IPI more fully recognise the role of safety and accessibility to active and public transport contribute to a well-functioning environment as per Policy 1 of the National Policy Statement Urban Development 2020 (NPS UD) and RPS Change 1.
S50.6	UFD-O3	Support and seek amendment	Amend UFD-O3 as shown in the submission to delete 'walkability' and insert 'active transport, bus routes'. See submission for details.	Waka Kotahi requests that this objective is widened to include consideration of accessibility to active modes and bus routes. This amendment aligns with the need to recognise accessibility in a well-functioning urban environment as per Policy 1 National Policy Statement Urban Development 2020 (NPS UD).
S50.7	UDF-P1	Support	Retain UDF-P1 as notified.	UDF-P1 - Support the use of the design guides to support the development of the higher density of urban form. This promotes high quality increased urban density in accordance with the National Policy Statement on Urban Development 2020 (NPS-UD) and the Medium Density Residential Standards (MDRS).
S50.8	UDF-P2	Support and seek amendment	Amend policy UDF-P2 to include consideration of accessibility and alternate modes of transport. See submission for specific amendments requested.	UDF-P2 - Generally supportive but an amendment is requested to align the policy with the need to recognise accessibility in a well-functioning urban environment as per Policy 1 National Policy Statement Urban Development 2020 (NPS UD).
S50.9	Entire IPI	Support and seek amendment	Amend Strategic Direction to include reference to 'accessible by active and public transport'. See submission for specific amendments requested.	Strategic Direction - Waka Kotahi support the focus of the strategic direction on providing for higher density in proximity to public transport and centres, but request the direction is amended to recognise that accessibility is an important part of a well-functioning urban environment as stated in the National Policy Statement on Urban Development 2020 (NPS-UD). This

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				would also be consistent with Proposed RPS Change 1 with respect to greenhouse gas reduction.
S50.10	CMU-O3	Support and seek amendment	Amend CMU-O3 to include a clause that includes reference to 'well serviced by existing or planned public and active transport'. See submission for specific amendments requested.	CMU-O3 - That the accessibility transport is included as a vital element to a well- functioning urban environment as stated in the National Policy Statement on Urban Development 2020 (NPS-UD). This also has the potential to encourage increased access to active and public transport to reduce greenhouse gas emissions. This would be consistent with Proposed RPS Change 1.
S50.11	TP-R3	Support and seek amendment	Amend TP-R3 to broaden the rule to apply to all zones and all direct accesses to and from the state highway network.	TP-R3 Site Access - Support the inclusion of site access standards to support permitted activity status for all direct accesses to the state highway, not just those sites within the commercial zones. Requiring safe standards for all state highway accesses contributes to the delivery of a well-functioning urban environment as per Policy 1 National Policy Statement Urban Development 2020 (NPS UD).
S50.12	TP-S1	Support and seek amendment	Amend the transport access standards for state highways to include minimum access spacing with any consequential amendments required throughout the rest of the plan to correctly reference the required access spacing standards for direct accesses to the state highway. See submission for specific requested amendments.	TP-S1 - Access to Commercial Zones - Support the inclusion of specific standards to promote the safety of access to the state highway network. The standards should also address safe access spacing to promote safety and contribute to the delivery of a well-functioning urban environment as per Policy 1 National Policy Statement Urban Development 2020 (NPS UD).
S50.13	SUB-HRZ-O2	Support and seek amendment	Amend SUB-HRZ-O2 so all modes and users are catered for rather than only walkers. See submission for specific requested amendments.	SUB-HRZ-O2 - Subdivision in the High Density Residential Zone. Support the inclusion of SUB-HRZ-O2 to ensure the necessary infrastructure is available to achieve well-functioning urban environments however, this consideration should consider accessibility for all modes and users, not just walkers.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S50.14	SUB-HRZ-P2	Support and seek amendment	Amend SUB-HRZ-P2 to include active transport and transport-accessibility. See submission for specific requested amendments.	SUB-HRZ-P2 - Should be amended to include facilities for all modes and users to provide accessible design in accordance with the National Policy Statement of Urban Development (NPS UD).
S50.15	DC-P1 and DC-R2B	Support and seek amendment	Amend DC-P1 and DC-R2B to refer to 'transportation' and 'facilities to access public transport and cycleways' as shown in the submission. See submission for detailed requested amendments. Any other consequential amendments are also sought.	DC-P1, DC-P2, DC-P3, DC-P6, DC-P7, DC-R2A, DC-R2B - supports the use of financial contributions for transport infrastructure and requests amendments to allow financial contributions to be collected for access to, or provision for all transport modes including walking, cycling and public transport. This is consistent with the National Policy Statement Urban Development (NPS UD) and Proposed PRS Change 1.
S50.16	PK-P4	Support and seek amendment	Amend PK-P4 to include access as a consideration for the limitations of a site for papakāinga. See submission for specific requested amendments.	Support enabling Papakāinga development to provide for the aspirations of tangata whenua in a manner consistent with tikanga. However, as there is no maximum scale of Papakāinga development Waka Kotahi requests an amendment to this policy to include appropriate provision of access as a limitation on the site.
S50.17	GRZ-P9	Support	Retain GRZ-P9 as notified.	GRZ-P9 - Support the promotion of accessibility of infrastructure to deliver well-functioning urban environments which are well connected to transport and infrastructure in accordance with the National Policy Statement on Urban Development 2020 (NPS-UD).
S50.18	HRZ-O4, HRZ-P6, and HRZ-P7	Support	Retain HRZ-O4, HRZ-P6, and HRZ-P7 as notified.	HRZ-O4, HRZ-P6, HRZ-P7 - Support the implementation of the heights and densities in accordance with the National Policy Statement on Urban Development 2020 (NPS-UD).
S50.19	St Patrick's Estate Precinct	Support and seek amendment	Amend the St Patrick's Estate Precinct provisions to require the re-development of this site to be supported by a qualifying	St Patrick's Estate Precinct - Support the zoning of St Patricks Estate as a High Density Residential Zone as this promotes the outcomes sought by both the National Policy Statement on

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			matter of a comprehensive structure plan process to support the development of the precinct that considers all aspects of the proposal, including transportation requirements, three waters, open space and commercial needs.	Urban Development 2020 (NPS-UD) and the Wellington Regional Growth Framework, but seeks that the development of the site is supported by a comprehensive Structure Plan process to ensure that the re-zoned area can achieve the outcome sought by National Policy Statement on Urban Development 2020 (NPS-UD).
S50.20	NCZ-O3, LCZ-O3, TCZ-O3, and MUZ-O3	Support and seek amendment	Amend NCZ-O3, LCZ-O3, TCZ-O3, and MUZ-O3 to include reference to provision for, or connection to active and public transport. See submission for specific requested amendments.	<p>NCZ-O3, LCZ-O3, TCZ-O3 - Support the Centre Zones in principle, but request that accessibility to active and public transport is also included within the objectives for these commercial zones. Facilitating increased access to active and public modes supports a well-functioning urban environment, encourages mode shift and is likely to result in a reduction in greenhouse gases.</p> <p>MUZ-O3 Support the Mixed Use Zone in principle, but request that accessibility to active and public transport is also included within the objective. Facilitating increased access to active and public modes supports a well-functioning urban environment, encourages mode shift and is likely to result in a reduction in greenhouse gases</p>
S50.21	NCZ-P1, LCZ-P1, TCZ-P1, and MUZ-P1	Support and seek amendment	Amend NCZ-P1, LCZ-P1, TCZ-P1, and MUZ-P1 to include reference to 'with access to active and public transport'. See submission for specific requested amendments.	<p>NCZ-P1, LCZ-P1, TCZ-P1 - Support the Centre Zones in principle, but request that accessibility to active and public transport is also an outcome for these commercial zones. Facilitating increased access to active and public modes supports a well-functioning urban environment, encourages mode shift and is likely to result in a reduction in greenhouse gases.</p> <p>MUZ-P1 - Support the Mixed Use Zone in principle, but request that accessibility to active and public transport is also an outcome for the MUZ.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				Facilitating increased access to active and public modes supports a well-functioning urban environment, encourages mode shift and is likely to result in a reduction in greenhouse gases.
S50.22	CZ-O2	Support and seek amendment	Amend CZ-O2 to refer to 'access to active and public transport' and delete the reference to 'a strong pedestrian focus'. See submission for specific requested amendments.	CZ-O2 - Support the City Centre Zone in principle, and in particular the maximisation of development, but request that transport, choice, and accessibility to active and public transport is also an outcome for this Zone. Facilitating increased access to active and public modes supports a well-functioning urban environment, encourages mode shift and is likely to result in a reduction in greenhouse gases.
S50.23	CZ-P1	Support and seek amendment	Amend CZ-P1 to add reference to 'access to active and public transport'. See submission for specific requested amendments.	CZ-P1 - Support the City Centre Zone in principle, but request that accessibility to active and public transport is also an outcome for this Zone. Facilitating increased access to active and public modes supports a well-functioning urban environment, encourages mode shift and is likely to result in a reduction in greenhouse gases.
S50.24	CZ-P4	Support and seek amendment	Amend CZ-P4 to add reference to 'access to active and public transport'. See submission for specific requested amendments.	CZ-P4 - Support the high density and high quality development in the City Centre Zone. This enables increased urban density in accordance with the National Policy Statement on Urban Development 2020 (NPS-UD) but request that policy is amended to further facilitate accessibility to active and public transport. Facilitating increased access to active and public modes supports a well-functioning urban environment, encourages mode shift and is likely to result in a reduction in greenhouse gases.
S50.25	Entire IPI	Support	Retain the Medium and High Density Design Guide, and the City Centre Design Guide as notified.	Medium and High Density Design Guide, City Centre Design Guide - Support the Design Guides as the use of the guides supports high quality and increased urban density in accordance

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				with the National Policy Statement on Urban Development 2020 (NPS-UD) and the Medium Density Residential Standards (MDRS).
S50.26	High Density Residential Zone	Oppose and seek amendment	Amend the extent of High Density Residential Zoning to give effect to a walkable catchment of 800m from train stations, the Town Centre Zone, and the City Centre Zone.	Amend the extent of High Density Residential Zoning to give effect to a walkable catchment of 800m from train stations, the Town Centre Zone, and the City Centre Zone.
S50.27	High Density Residential Zone	Oppose and seek amendment	Amend the High Density Residential Zoning to extend 200-400m around Local Centre Zones.	Waka Kotahi is of the view that the Local Centres should include a walkable catchment of high density development of 200-400m to realise the development capacity required by the National Policy Statement on Urban Development 2020 (NPS-UD).
S50.28	Qualifying Matters	Oppose and seek amendment	Include an overlay as qualifying matter which requires sensitive activities within 100m of State Highway 2 to provide mitigation for noise effects in accordance with Waka Kotahi standards.	Noise - Reverse sensitivity effects associated with traffic noise from the state highway create health and amenity effects that require management. The Upper Hutt District Plan does not contain provisions to manage noise and vibration effects to new noise sensitive activities established alongside state highways. Where there is intensification of noise sensitive activities proposed which has immediate legal effect, Council should introduce a qualifying matter to manage this effect. See submission for reasoning.
Submitter 51: Ministry of Education				
S51.1	New definition	Seek amendment	New definition for Additional Infrastructure a. public open space; b. community infrastructure as defined in section 197 of the Local Government Act 2002; c. land transport (as defined in the Land Transport	Council has an obligation under the NPS-UD to ensure that 'additional infrastructure' (which includes educational facilities) is provided for. Local authorities must be satisfied that the additional infrastructure to service the development capacity is likely to be available (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular). Under the NPS-UD, educational facilities is included within the definition of 'additional infrastructure'. The Ministry have recommended

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			Management Act 2003) that is not controlled by local authorities; d. social infrastructure, such as schools and healthcare facilities; e. a network operated for the purpose of telecommunications (as defined in section 5 of the Telecommunications Act 2001); f. a network operated for the purpose of transmitting or distributing electricity or gas.	amendments to the IPI to enable educational facilities through the inclusion of additional infrastructure. The Ministry supports that 'additional infrastructure' (as defined in the NPS-UD) should subsequently be included in the IPI as defined under the National Policy Statement on Urban Development.
S51.2	Policy GRZ – P1	Support and seek amendment	Policy GRZ – P1 To provide for a range of building densities within the residential areas <u>that are compatible in form and scale with the neighbourhood's planned built form and character</u> which takes into account the existing character of the area, topography and the capacity of the infrastructure (including additional infrastructure).	Council has an obligation under the NPS-UD to ensure sufficient 'additional infrastructure' (which includes educational facilities) is provided in development, and local authorities must be satisfied that additional infrastructure to service the development capacity is likely to be available (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular). Educational facilities should therefore be enabled in the GRZ as to service the growth enabled by the IPI. Educational facilities are non-residential activities that typically locate in residential zones to support the surrounding residential catchments. Therefore, the Ministry requests that Policy GRZ – P1 is amended to specifically consider the capacity of additional infrastructure (which includes schools).
S51.3	Policy GRZ – P9	Support and seek amendment	Policy GRZ – P9 To promote residential development with a high level of amenity and ensure that it has adequate access to infrastructural (including additional infrastructure) requirements, <u>while</u>	Council has an obligation under the NPS-UD to ensure sufficient 'additional infrastructure' (which includes educational facilities) is provided in development, and local authorities must be satisfied that additional infrastructure to service the development capacity is likely to be available (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular).

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<u>recognising that amenity values develop and change over time.</u>	Educational facilities are a crucial form of social infrastructure that typically locate in residential zones to support the surrounding residential catchments. Therefore, the Ministry requests that Policy GRZ – P9 is amended to specifically enable additional infrastructure to support the needs and demands of those residential communities.
S51.4	Rule GRZ – 19	Oppose and seek amendment	Rule GRZ – 19 Places of assembly (including places of worship, educational facilities) are by default Discretionary activities.	The Upper Hutt Operative District Plan currently enables an educational facility to be established as a Discretionary activity by default. Educational facilities are a crucial form of social infrastructure that is needed to support local communities and their social and economic wellbeing. Council has an obligation under the NPS-UD to ensure sufficient additional infrastructure (which includes social infrastructure like schools) is provided in development and local authorities must be satisfied that additional infrastructure to service the development capacity is likely to be available (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular).
S51.5	New Provision GRZ-R18	Seek amendment	<p>New Provision GRZ-R18 - Educational Facility</p> <p>Council will restrict its discretion to and impose conditions on</p> <ol style="list-style-type: none"> 1. Location of the proposed education facility. 2. Appearance and design of the buildings. 3. Transport safety and efficiency 4. Design and layout of car parking, loading, manoeuvring and access areas. 5. Provision of utilities and/or services. 6. Landscaping 7. Hours of operation. <p>Restriction on notification</p>	Educational facilities are a crucial form of social infrastructure that is needed to support local communities and their social and economic wellbeing. The Ministry request that educational facilities are provided for within the District Plan as a Restricted Discretionary activity. Enabling educational facilitates as a Restricted Discretionary activity will allow the Ministry to better service the growth of the Upper Hutt District and support the local communities’ needs, particularly in residential areas. Matters of discretion should be limited to matters of relevance. The Ministry encourages engagement with Council on this approach.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			Subject to sections 95A(2)(b), 95A(2)(c), 95A(4) and 95C of the Act, a resource consent application for an education facility will be precluded from public notification under section 95A, but limited notification of an application will be determined in accordance with section 95B.	
S51.6	HRZ – O4	Support and seek amendment	Objective HRZ – O4 The planned built urban form of the High Density Residential Zone includes high density residential development of heights and densities of urban form greater than that provided for in the General Residential Zone <u>whilst ensuring that it has adequate access to infrastructural (including additional infrastructure) requirements.</u>	Council has an obligation under the NPS-UD to ensure sufficient ‘additional infrastructure’ (which includes educational facilities) is provided in development, and local authorities must be satisfied that additional infrastructure to service the development capacity is likely to be available (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular). Educational facilities should therefore be enabled in the HRZ to service the growth enabled by IPI. Educational facilities typically locate in residential zones to support the surrounding residential catchments. Therefore, the Ministry requests that the HRZ – O4 be amended so that it acknowledges that development in residential areas should be supported by infrastructure (including additional infrastructure) to meet the needs of residential communities in the future.
S51.7	New Policy HRZ – P9	Seek amendment	HRZ New Policy HRZ – P9: <u>Development is supported by educational facilities.</u>	Council has an obligation under the NPS-UD to ensure sufficient ‘additional infrastructure’ (which includes educational facilities) is provided in development, and local authorities must be satisfied that additional infrastructure to service the development capacity is likely to be available (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular). Educational facilities should therefore be enabled in the HRZ to service the growth enabled by IPI. Educational facilities typically locate in residential zones to support the surrounding residential catchments. Therefore, the Ministry requests that an

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				additional policy is added to the HRZ chapter that acknowledges that development in residential areas should be supported by educational facilities to help meet the needs and demand of residential communities in the future.
S51.8	NCZ – R10	Support	Rule NCZ – R10 Retain as proposed.	The Ministry considers NCZ – R10 acceptable and support the matters of discretion to manage any effects of educational facility in the NCZ.
S51.9	LCZ – R9	Support	Rule LCZ – R9 Retain as proposed.	The Ministry supports the provision of educational facilities in the LCZ and the standards to manage the effects of educational facilities in the LCZ.
S51.10	MUZ – R9	Support	Rule MUZ – R9 Retain as proposed.	The Ministry supports the provision of educational facilities in the MUZ and the standards to manage the effects of educational facilities in the MUZ.
S51.11	TCZ – R9	Support	Rule TCZ – R9 Retain as proposed.	The Ministry supports the provision of educational facilities in the TCZ and the standards to manage the effects of educational facilities in the TCZ.
S51.12	CCZ – R15	Support	Rule CCZ – R15 Retain as proposed	The Ministry supports the provision of educational facilities in the CCZ.
Submitter 52: Oyster Management Limited				
S52.1	MUZ	Support	Retain the Mixed Use zoning of 11-15 Jepsen Grove.	Oyster supports the rezoning of 11-15 Jepsen Grove from General Industrial Zone to Mixed Use Zone. The Mixed Use zoning of the site is appropriate because the site is well placed for a range of activities that are provided for in the Mixed Use Zone.
S52.2	MUZ	Support	Retain the MUZ – Mixed Use Zone provisions as notified.	Oyster supports the introduction of the Mixed Use Zone. It is appropriate to provide for a range of activities in certain areas within the Upper Hutt District.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S52.3	MUZ-O2	Support	Retain Objective MUZ-O2 as notified	Oyster supports Objective MUZ-O2 to the extent it provides for a mix of activities generally of a medium to high scale and density. Providing for medium to high density activities gives effect to the direction in the NPS-UD to provide sufficient development capacity to meet the expected demand for business land.
S52.4	MUZ-P1	Support	Retain Policy MUZ-P1 as notified.	Oyster supports Policy MUZ-P1 to the extent that it provides for activities that are consistent with the anticipated role, function, and character of the Mixed Use Zone.
S52.5	MUZ-R1	Support	Retain Rule MUZ-R1 as notified.	Oyster supports the permitted activity status for buildings and structures, including additions and alterations (where certain standards are complied with) in the Mixed Use Zone.
S52.6	MUZ-R12	Support and seek amendment	Amend Rule MUZ-R12 as follows: Activity status: Permitted Where: a. The gross floor area per tenancy does not exceed 250m²; and b. Compliance is achieved with MUZ-S6 (Landscaping and Screening).	Oyster supports the permitted activity status for office activities in the Mixed Use Zone. Oyster opposes the standard that provides that gross floor area per tenancy must not exceed 250m ² . Oyster considers that it is appropriate to provide for office activities with no limit on gross floor area in the Mixed Use Zone. Enabling office activities without a cap will give effect to the direction in the NPS-UD to provide sufficient development capacity to meet the expected demand for business land.
S52.7	MUZ-R18	Support	Retain Rule MUZ-R18 as notified	Oyster supports the restricted discretionary activity status for light industrial activities in the Mixed Use Zone, where certain standards are complied with.
S52.8	MUZ-S1	Support	Retain Standard MUZ-S1 as notified.	Oyster supports Standard MUZ-S1 to the extent it provides that the maximum building height for the Mixed Use Zone is 26m.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S52.9	Entire IPI	Seeks amendment	In addition to the specific relief sought, Oyster seeks such additional or consequential relief to give effect to the matters raised in this submission.	Not stated
Submitter 53: New Zealand Defence Force				
S53.1	Entire IPI	Seeks amendment	Seek to ensure that when significant intensification occurs within close proximity to Defence Facilities as proposed through the IPI, then reverse sensitivity effects are managed so that the ongoing operation of Defence Facilities are protected	NZDF recognises the need to provide for intensification but wants to ensure that when significant intensification occurs within close proximity to Defence Facilities as proposed through the IPI, then reverse sensitivity effects are managed so that the ongoing operation of Defence Facilities are protected.
S53.2	Definitions	Seek amendment	A new definition of “Nationally Significant Infrastructure” is added to Section 3.1 of the Proposed Plan, which specifically includes Defence Facilities.	Under the Urban Development Act, defence land and airspace are specifically included in the definition of nationally significant infrastructure (Section 9 Urban Development Act 2020). There is also clear policy direction within the current Operative District Plan which aims to provide for the operation and development of the Trentham Military Camp. Any intensification within the vicinity of a Defence Facility has the potential to compromise its safe and efficient operation due to reverse sensitivity effects. NZDF requests that a new definition of “Nationally Significant Infrastructure” is added to Section 3.1 of the Proposed Plan, which specifically includes Defence Facilities. NZDF is seeking a consistent definition within district plans throughout the country.
S53.3	Definitions	Support and seek amendment	The definition of “Qualifying matter area” be amended to include a reverse sensitivity buffer area for Defence Facilities. This will include an area around	Generally support the proposed definition of “Qualifying matter” in section 3.1, but requests that the definition of “Qualifying matter area” be amended to include a reverse sensitivity buffer area for Defence Facilities. This will include an

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			Defence Facilities within which reverse sensitivity effects can be managed (through a qualifying matter) to ensure the safe and efficient operation of Nationally Significant Infrastructure.	area around Defence Facilities within which reverse sensitivity effects can be managed (through a qualifying matter) to ensure the safe and efficient operation of Nationally Significant Infrastructure. Further technical work will be undertaken by NZDF to define the NZDF reverse sensitivity buffer area prior to the hearing.
S53.4	Definitions	Support	Retain the definition of Reverse Sensitivity as proposed.	Support the proposed definition of reverse sensitivity.
S53.5	Entire IPI	Support and seek amendment	Include the requirement for new development authorised by this Plan Change, that is within the NZDF reverse sensitivity buffer area, to include no-complaints covenants in favour of NZDF.	Broadly support the proposed residential zoning on NZDF land and on the land surrounding Trentham Camp, subject to the management of reverse sensitivity effects. This includes the requirement for new development authorised by this Plan Change, that is within the NZDF reverse sensitivity buffer area, to include no-complaints covenants in favour of NZDF.
S53.6	Entire IPI	Seeks amendment	The policy framework for both the High Density and General Residential zones acknowledges, and is supportive of, existing Defence facilities and operations, recognising that Trentham Military Camp has operated in this location for many years. The policy framework needs to set a clear direction in relation to avoiding reverse sensitivity effects on the Camp in order to ensure the safe and efficient operation of nationally significant infrastructure	Request that the policy framework for both the High Density and General Residential zones acknowledges, and is supportive of, existing Defence facilities and operations, recognising that Trentham Military Camp has operated in this location for many years. The policy framework needs to set a clear direction in relation to avoiding reverse sensitivity effects on the Camp in order to ensure the safe and efficient operation of nationally significant infrastructure.
S53.7	Entire IPI	Support and seek amendment	That additional permitted activity standards requiring the registration of no-complaints covenants in favour of the NZDF are incorporated into intensification rules, for new development authorised by	Request that additional permitted activity standards requiring the registration of no-complaints covenants in favour of the NZDF are incorporated into intensification rules, for new development authorised by this Plan Change, in the proposed NZDF reverse sensitivity buffer area.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			this Plan Change, in a NZDF reverse sensitivity buffer area.	
S53.8	Entire IPI	Support and seek amendment	That reverse sensitivity be considered as a matter of control or discretion for proposed intensification not meeting permitted activity standards within a NZDF reverse sensitivity buffer area.	Request that reverse sensitivity be considered as a matter of control or discretion for proposed intensification not meeting permitted activity standards within the buffer area.
S53.9	Definitions	Seek amendment	Add a definition of "Nationally Significant Infrastructure" and specifically include "Defence Facilities".	Under the Urban Development Act, defence land and airspace are specifically included in the definition of nationally significant infrastructure.
S53.10	Definitions	Seek amendment	Amend definition of "Qualifying Matter Area" to include "NZDF reverse sensitivity buffer area".	Defence facilities are nationally significant infrastructure and further provision is needed to ensure the safe and efficient operation of these facilities. In order to manage the effects of reverse sensitivity from the proposed intensification, NZDF proposes that a buffer area around Defence Facilities is added as a qualifying matter. Further work will be undertaken by NZDF to define the NZDF reverse sensitivity buffer area prior to the hearing.
S53.11	Definitions	Support	Retain definition of 'reverse sensitivity' as notified.	Reverse sensitivity - The management of reverse sensitivity effects on camps and bases is an important issue for NZDF across New Zealand, including in relation to Trentham Military Camp. Defining reverse sensitivity and applying it in a policy framework is important to maintain the effective and efficient operation of NZDF bases across New Zealand.
S53.12	Entire IPI	Seek amendment	Include objectives and policies that specifically manage reverse sensitivity effects on Trentham Military Camp in both the General Residential zone and the High Density Residential Zone. Means to	Trentham Military Camp needs to be protected from reverse sensitivity effects including through the relevant District Plan provisions. The IPI proposes to intensify residential land immediately adjacent to Trentham Military Camp. Providing for high-density housing and other sensitive activities in the vicinity

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			achieve this include through the registration of no-complaint covenants in NZDF's favour within the NZDF reverse sensitivity buffer area.	of the Camp means that the potential for reverse sensitivity effects on the Camp's operations are increased. The policy framework needs to set a clear direction in relation to avoiding reverse sensitivity effects on the Camp in order to ensure the safe and efficient operation of nationally significant infrastructure. NZDF has sought, and been granted, no complaints covenants in its favour for development near to its camps and bases across New Zealand. This includes residential development in close proximity to Trentham Military Camp.
S53.13	SUB-RES-MC1	Seek amendment	Amend clause (6) of Policy SUB-RES-MC1 to include Trentham Military Camp.	Recognition of reverse sensitivity when considering Subdivision in the General Residential Zone needs to include Trentham Military Camp.
S53.14	Entire IPI	Support and seek amendment	Not specifically stated, support in part the proposed residential zoning on NZDF land and on the land surrounding Trentham Camp, subject to requested relief being granted.	Broadly support the proposed residential zoning on NZDF land and on the land surrounding Trentham Camp, subject to the management of reverse sensitivity effects, including a requirement for new development authorised by this Plan Change to include no-complaints covenants in favour of NZDF.
Submitter 54: Name Withheld				
S54.1	Entire IPI	Support	Not stated.	The plan change is important, particularly so what we can build up, housing more people, while retaining green space.
Submitter 55: Duncan Stuart				
S55.1	Southern Growth Area	Seek amendment	Remove the Southern Growth Area from future growth planning	The intent to develop the Southern Growth Area is in direct contrast with the incoming Regional Policy Statement Change 1 from GWRC. Putting 2,000+ houses far away from infrastructure will a create car-dependent suburb, significantly impacting on our ability to meet climate targets. Recent slips as a result of heavy rain in our changing climate suggest it is not a particular great idea to start building on hills - and that we should build on the valley floor. This will ensure future ratepayers do not have to bear these obvious costs.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
Submitter 56: Fire and Emergency New Zealand				
S56.1	Definitions	Support	Definition - Emergency service facility - Retain as notified.	Supports the definition of 'Emergency Service Facility' as it supports the provision of an appropriate rule framework to provide for emergency service facilities to support the health and safety of the community
S56.2	UFD-O1 and CMU-O1	Support	UFD-O1 and CMU-O1 - Retain as notified.	Supports UFD-O1 and CMU-O1 insofar that they require Council to provide for a well-functioning urban environment that enables all people and communities to provide for their health and safety, now and into the future. These objectives provide scope for the consideration of, and the requirement to provide, an adequate firefighting water supply and adequate emergency access and egress in the event of an emergency.
S56.3	New standard	Seek amendment	TP-R3 Site Access - Activities and buildings and structures if site access <u>if is</u> compliant with TP-S1 and <u>TP-SX</u>	Seeks to include proposed new standard TP-SX as a permitted activity standard for site access in the Commercial and Mixed Use Zones. Fire and Emergency considers it important that activities, buildings, and structures are provided with a site access that ensures Fire and Emergency has the ability to efficiently and effectively respond to emergencies.
S56.4	New standard	Seek amendment	Include a new transport standard as follows, which should apply to all subdivision and land use activities in all zones: <u>TP-SX – Firefighting appliance access 1. Any access to a site located in an area where no fully reticulated water supply system is available, or having a length greater than 50 metres when connected to a road that has a fully reticulated water supply system including hydrants, must be designed to accommodate a fire appliance</u>	Whilst it is acknowledged that the Council has a Code of Practice for Civil Engineering Works (hereafter referred to as the 'Engineering Code'), it is unclear whether access and roading requirements adequately provide for firefighting access. Fire and Emergency therefore seeks a new standard to be included within the Transport section which should apply to all subdivisions and land use activities in all zones. Vehicular roading and access widths, surface and gradients should support the operational requirements of Fire and Emergency appliances. Fire and Emergency therefore seeks a new vehicle access standard that helps ensure access design accommodates a fire appliance vehicle of at least 2.5m wide,

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>design vehicle of at least 2.5 metres wide and 13 metres long and with a minimum gross mass of 25 tonne including:</u></p> <p><u>a. a gradient of no more than 16%; and</u></p> <p><u>b. a minimum clear passageway and/or vehicle crossing of at least 3.5 metres width at the site entrance, internal entrances and between buildings; and</u></p> <p><u>c. a minimum formed carriageway width of 4 metres; and</u></p> <p><u>d. a height clearance of at least 4 metres; and</u></p> <p><u>e. a design that is free of obstacles that could hinder access for emergency service vehicles.</u></p> <p><u>Zone: All</u></p>	<p>13m long and a minimum gross mass of 25 tonne in circumstances where onsite access is vital.</p> <p>Fire and Emergency vehicles have a maximum hose run distance of 75m. To effectively respond to a fire, it is vital that Fire and Emergency can access all parts of a building within the 75m hose run distance. As such, Fire and Emergency seeks for the proposed access standard to apply to any access to a site that has a greater length than 50 metres, providing a distance of 25 metres that will allow the hose run to reach the entirety of buildings located onsite.</p> <p>Furthermore, where sites are located outside of the reticulated area, Fire and Emergency requires access to alternative firefighting water supplies provided onsite, such as water tanks. The proposed new standard therefore seeks to encompass the above requirements.</p>
S56.5	New objective and policy	Seek amendment	<p><u>New objective and policy - SUB-GEN-OX Three Waters Infrastructure</u></p> <p><u>Three Waters infrastructure is provided as part of subdivision and development, and in a way that is:</u></p> <p><u>Integrated, Effective, Efficient, Functional, Safe, Sustainable, Resilient</u></p> <p><u>SUB-GEN-PX Three Waters Servicing</u></p> <p><u>a. All subdivision and development provide integrated Three Waters infrastructure and services to a level that is appropriate to their location and intended use.</u></p> <p><u>b. Where there is inadequate three waters infrastructure for the planned built environment, and necessary upgrades and improvements are not feasible in the</u></p>	<p>Fire and Emergency seeks a new objective that promotes the provision of infrastructure for subdivision in all zones.</p> <p>Furthermore, Fire and Emergency seeks the inclusion of a new policy that promotes subdivision activities in all zones be adequately serviced, particularly in relation to reticulated water supply.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<u>short to long term, then avoid further intensification until constraints are resolved.</u>	
S56.6	SUB-RES-O2	Support	SUB-RES-O2 Retain as notified.	Supports SUB-RES-O2 insofar that it requires Council to provide for a well-functioning urban environment that enables all people and communities to provide for their health and safety, now and into the future. This objective framework provides scope for the consideration of, and the requirement to provide, an adequate firefighting water supply and adequate emergency access and egress in the event of an emergency.
S56.7	SUB-RES-P5	Support	SUB-RES-P5 Retain as notified.	Supports SUB-RES-P5 insofar as it provides for subdivision that has adequate access to infrastructural requirements. This provides scope to ensure the provision of a water supply, including a firefighting water supply.
S56.8	SUB-RES-R1	Support and seek amendment	SUB-RES-R1 Subdivision within the General Residential Zone 2. B. Each residential unit complies with the following rules and standards: <u>(x) SUB-RES-SX</u>	Seeks that all subdivisions, controlled or otherwise, require compliance with the standard sought under TP-SX. This will ensure that all allotments can be appropriately accessed by fire appliances in the event of an emergency. Furthermore, Fire and Emergency seeks that all subdivisions in the residential zone make adequate provision for water supply, including a firefighting water supply, for all new allotments in accordance with the aforementioned Code of Practice, as is required in other zones within the district. A new standard is therefore sought, as detailed later in this table.
S56.9	SUB-RES-S3	Support and seek amendment	SUB-RES-S3 Access standards for subdivision - Retain as notified.	Subject to the relief sought in the Transport and Parking chapter regarding the inclusion of a new fire appliance access standard, this provision will ensure that subdivisions within the General Residential Zone are capable of being accessed by fire appliances when sites are located outside of the reticulated area or have an accessway exceeding 50m in length.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S56.10	New standard	Seek amendment	Add a new standard as follows: <u>SUB-RES-SX</u> <u>Water supply, stormwater, and wastewater</u> 1. All activities shall comply with the water supply (including firefighting water supply), stormwater and wastewater standards in the Code of Practice for Civil Engineering Works.	Subdivisions in Commercial Zones require compliance with water supply, stormwater, and wastewater standards in the Code of Practice for Engineering Works, under SUB-COM-S3 (as proposed to be amended to SUB-IND-C3). This provision does not however appear to be reflected in all zones. Fire and Emergency therefore seeks the inclusion of the requirement to meet three waters standards within the Code of Practice for Civil Engineering Works in the general residential zone. However, to increase visibility within the UHCC District Plan, Fire and Emergency seeks to also include reference specifically to firefighting water supply.
S56.11	SUB-RES-R6	Support and seek amendment	SUB-RES-R6 - Amend as follows: Subdivision that is not a controlled activity under rule SUB-RES-R1; and subdivision that does not comply with one or more of the standards under <u>SUB-RES-S1 (1) SUB-RES-S3, and SUB-RES-SX.</u> Council will restrict its discretion to, and may impose conditions on: ...	Seek that proposals which are unable to comply with residential subdivision standards SUB-RES-SX and TP-SX have an activity status of restricted discretionary. This will ensure that matters of interest to Fire and Emergency, namely fire appliance access and firefighting water supply, are appropriately considered in the assessment of such proposals.
S56.12	SUB-HRZ-O1	Support	56.12 SUB-HRZ-O1 Well-functioning Urban Environments - Retain as notified.	Fire and Emergency supports SUB-HRZ-O1 insofar as it requires Council to provide for a well-functioning urban environment that enables all people and communities to provide for their health and safety, now and into the future. This objective framework provides scope for the consideration of, and the requirement to provide, an adequate firefighting water supply and adequate emergency access and egress in the event of an emergency.
S56.13	SUB-HRZ-O2	Support	56.13 SUB-HRZ-O2 - Retain as notified.	Fire and Emergency supports SUB-HRZ-O2 insofar as it promotes the construction of infrastructure to facilitate the demand of urban intensification.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S56.14	SUB-HRZ-R1	Support and seek amendment	SUB-HRZ-R1 Subdivision within the High Density Residential Zone - Amend as follows: 1. b. ii. Each residential unit complies with the following rules and standards: <u>(x) SUB-HRZ-SX</u> 2. a. Compliance is not achieved.... under HRZ-SUB-R1 <u>SUB-HRZ-R1</u>	Fire and Emergency seeks that all subdivisions, controlled or otherwise, require compliance with the standard sought under TP-SX. This will ensure that all allotments can be appropriately accessed by fire appliances in the event of an emergency. Furthermore, Fire and Emergency seeks that all subdivisions in the high density residential zone make adequate provision for water supply, including a firefighting water supply, for all new allotments in accordance with the aforementioned Code of Practice, as is required in other zones within the district. A new standard is therefore sought, as detailed later in this table.
S56.15	SUB-HRZ-S2	Support	SUB-HRZ-S2 - Retain as notified.	Subject to the relief sought in the Transport and Parking chapter regarding the inclusion of a new fire appliance access standard, this provision will ensure that subdivisions within the High Density Residential Zone are capable of being accessed by fire appliances when sites are located outside of the reticulated area or have an accessway exceeding 50m in length.
S56.16	New standard	Seek amendment	Add a new standard as follows: <u>SUB-HRZ-SX</u> <u>Water supply, stormwater, and wastewater</u> 2. <u>All activities shall comply with the water supply (including firefighting water supply), stormwater and wastewater standards in the Code of Practice for Civil Engineering Works.</u>	Subdivisions in Commercial Zones require compliance with water supply, stormwater, and wastewater standards in the Code of Practice for Engineering Works, under SUB-COM-S3 (as proposed to be amended to SUB-IND-C3). This provision does not however appear to be reflected in all zones. Fire and Emergency therefore seeks the inclusion of the requirement to meet three waters standards within the Code of Practice for Civil Engineering Works in the general residential zone. However, to increase visibility within the UHCC District Plan, Fire and Emergency seeks to also include reference specifically to firefighting water supply.
S56.17	SUB-CMU-R1	Support and seek amendment	SUB-CMU-R1 Subdivision around any existing lawfully established building which does not result in the creation of	Supports SUB-CMU-R1 insofar as it requires compliance with SUB-CMU-S2, which requires all subdivisions to comply with the water supply standards set out in the Code of Practice for Civil

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			any new undeveloped allotment - Amend as follows: 1. Activity status: Controlled Where: a) Compliance is achieved with i. <u>SUB-CMU-S1</u> 2. Activity status: Restricted Discretionary Where: a) Compliance is not achieved with <u>SUB-CMU-S1</u> , SUB-CMU-S2....	Engineering Works. However, Fire and Emergency seeks the inclusion of an additional matter of compliance relating to the proposed access standards for subdivision in Commercial and Mixed Use zones (SUB-CMU-S1).
S56.18	PK-P4	Support	PK-P4 Maximum scale of papakāinga development - Retain as notified.	Support PK-P4 insofar that the maximum intensity and scale of papakāinga development will be determined by the limitations of the site, including: (i) adequate provision of on-site or off-site infrastructure to serve the papakāinga. It is important that papakāinga is adequately serviced with a sufficient firefighting water supply, both in the reticulated and unreticulated areas of Upper Hutt. This should be ensured by the servicing provisions of the underlying zone. Further, Fire and Emergency note that any papakāinga development will be subject the access provisions of the transport chapter.
S56.19	GRZ-O2	Support	GRZ-O2 Well-functioning Urban Environments - Retain as notified.	Supports GRZ-O2 insofar that it requires Council to provide for a well-functioning urban environment that enables all people and communities to provide for their health and safety, now and into the future. This objective framework provides scope for the consideration of, and the requirement to provide, an adequate firefighting water supply and adequate emergency access and egress in the event of an emergency.
S56.20	New objective	Seeks amendment	Add a new objective as follows: GRZ-OX Three Waters Infrastructure Three Waters infrastructure is provided as part of subdivision and development, and in a	Seeks a new objective that promotes the provision of infrastructure for all development within the General Residential Zone.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			way that is: Integrated, Effective, Efficient, Functional, Safe, Sustainable, Resilient	
S56.21	GRZ-P1	Support	GRZ-P1 - Retain as notified.	Supports GRZ-P1 insofar as it provides for development which takes into account the capacity of the infrastructure.
S56.22	GRZ-P9	Support	GRZ-P9 - Retain as notified.	Supports GRZ-P9 insofar as it promotes residential development that has adequate access to infrastructural requirements.
S56.23	GRZ-S4	Support and seek amendment	Add advice note to GRZ-S4: Advice note: <u>Building setback requirements are further controlled by the Building Code. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u>	Acknowledge that standard GRZ-S4 incorporates the density standards required by Part 2 of Schedule 3A of the RMA. Fire and Emergency have concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area. Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e., developers) early on in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with standard GRZ-S4 directing plan users to the requirements of the NZBC.
S56.24	GRZ-S5	Support and seek amendment	GRZ-S5 Outdoor living space Add advice note: Advice note: <u>Site layout requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from</u>	Support the provision of an outdoor living space on the premise that while not directly intended, may provide access for emergency services and space for emergency egress. Fire and Emergency acknowledge that firefighting access requirements are managed through the NZBC however consider it important that these controls are brought to the attention of plan users (i.e., developers) in the resource consent process so that they

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<u>buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u>	can incorporate the NZBC requirements early on in their building design. The NZBC requirements will have an influence over how a site is designed and consequential site layout therefore Fire and Emergency consider it important that developers incorporate these requirements into their site layout at resource consent stage so that Council are able to assess this design to ensure compliance with the RMA. Fire and Emergency therefore request that, as a minimum, an advice note is included with GRZ-S5 directing plan users to the requirements of the NZBC.
S56.25	GRZ-R11	Support and seek amendment	GRZ-R11 Buildings which do not comply with permitted activity standards - Amend as follows: Council will restrict its discretion to and may impose conditions on: <u>x. the degree, extent and effects of the non-compliance with GRZ-S1 and GRZ-S10.</u>	Seeks additional matters of discretion that allows Council to consider the degree, extent, and effects of the non-compliance with GRZ-S1, GRZ-S10 and TP-SX (as per relief sought in Transport Chapter).
S56.26	GRZ-R12, GRZ-R12A, GRZ-R12B	Support and seek amendment	GRZ-R12, GRZ-R12A, GRZ-R12B - Amend as follows: The construction and use of ... that do not comply with one or more of the following permitted standards: <u>(x) GRZ-S1(xi) GRZ-S10</u>	Seeks the inclusion of standards GRZ-S1 (access) and GRZ-S10 (three waters connections) under Rules R12, R12A and R12N to ensure that land use activities which are unable to comply with such standards are treated as restricted discretionary activities.
S56.27	New rule	Seeks amendment	Add a new rule as follows: <u>GRZ-RX Emergency Service Facility</u> <u>1. Activity status: Restricted Discretionary</u> <u>Matters of discretion are restricted to:</u> <u>1. The extent to which the activity may adversely impact on the anticipated character and amenity values of the</u>	Seeks the addition of a new rule for 'emergency service facility'. New fire stations may be necessary in order to continue to achieve emergency response time commitments in stations where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<u>General Residential Zone</u> <u>2. The effects of the activity on the existing and anticipated function and role of the General Residential Zone.</u> <u>3. The potential of the activity to compromise other activities that are enabled in the General Residential Zone.</u> <u>4. The extent to which the adverse effects of the activity can be avoided, or appropriately remedied or mitigated.</u> <u>5. The functional need or operational need for the emergency service facility to be located in the General Residential Zone.</u>	stations. Fire and Emergency considers that adding a new rule provides for emergency service facilities in this zone as a restricted discretionary activity. This will better provide for health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations
S56.28	HRZ-O1	Support	HRZ-O1 Well-functioning Urban Environments - Retain as notified	Not stated.
S56.29	HRZ-R1, HRZ-R3, HRZ-R4, HRZ-S1	Support	HRZ-R1, HRZ-R3, HRZ-R4, HRZ-S1 - Retain as notified.	Supports HRZ-R1, HRZ-R3, HRZ-R4 and HRZ-S1 insofar as all activity rules, standards and matters of the GRZ are applicable to these rules. Therefore, subject to relief sought in GRZ chapter, Fire and Emergency supports these provisions.
S56.30	New rule	Seek amendment	Add a new rule as follows: <u>HRZ-RX</u> <u>Emergency Service Facility 1. Activity status: Restricted Discretionary Matters of discretion are restricted to 1. The extent to which the activity may adversely impact on the anticipated character and amenity values of the High Density Residential Zone</u> <u>2. The effects of the activity on the existing and anticipated function and role of the High Density Residential Zone.</u> <u>3.</u>	Seeks the addition of a new rule for 'emergency service facility'. New fire stations may be necessary in order to continue to achieve emergency response time commitments in stations where development occurs, and populations change. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA, and therefore does not have the ability to designate land for the purposes of fire stations. Fire and Emergency considers that adding a new rule provides for emergency service facilities in this zone as a restricted discretionary activity.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>The potential of the activity to compromise other activities that are enabled in the High Density Residential Zone. 4. The extent to which the adverse effects of the activity can be avoided, or appropriately remedied or mitigated. 5. The functional need or operational need for the emergency service facility to be located in the High Density Residential Zone.</u></p>	<p>This will better provide for health and safety of the community by enabling the efficient functioning of Fire and Emergency in establishing and operating fire stations.</p>
S56.31	HRZ-PREC2-R1, HRZ-PREC2-R2, HRZ-PREC2-R3	Support	HRZ-PREC2-R1, HRZ-PREC2-R2, HRZ-PREC2-R3 - Retain as notified.	<p>Supports HRZ-PREC-R1 to HRZ-PREC-R3 insofar as the activity rules and standards in the High Density Residential Zone apply. Therefore, subject to the relief sought in the High Density Residential chapter, Fire and Emergency supports the provisions of Precinct 2.</p>
S56.32	Add new objective and policy	Seeks amendment	<p>Add a new objective and policy as follows: <u>NCZ-OX Three Waters Infrastructure</u> <u>Three Waters infrastructure is provided as part of subdivision and development, and in a way that is:</u> <u>Integrated, Effective, Efficient, Functional, Safe, Sustainable, Resilient</u> <u>NCZ-PX Three Waters Servicing</u> <u>a. All subdivision and development provide integrated Three Waters infrastructure and services to a level that is appropriate to their location and intended use.</u> <u>b. Where there is inadequate three waters infrastructure for the planned built environment, and necessary upgrades and improvements are not feasible in the</u></p>	<p>Fire and Emergency seeks a new objective that promotes the provision of infrastructure for development within the Neighbourhood Centre Zone. Furthermore, Fire and Emergency seeks the inclusion of a new policy that promotes land use activities in the Neighbourhood Centre Zone be adequately serviced, particularly in relation to reticulated water supply.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<u>short to long term, then avoid further intensification until constraints are resolved.</u>	
S56.33	NCZ-P3	Support and seek amendment	NCZ-P3 Other activities - Amend as follows: <u>6. There is a functional and operational need for the activity to locate in the Neighbourhood Centre Zone.</u>	Fire and Emergency supports NCZ-P3 insofar as it allows for other activities to occur within the NCZ. Due to urban growth, population changes and commitments to response times, Fire and Emergency may have a functional and operational need to locate stations within the NCZ in the future. Therefore, Fire and Emergency seeks an amendment to NCZ-P3 that allows for other activities where there is a functional and operational need to locate in the zone.
S56.34	NCZ-R1	Support	NCZ-R1 Buildings and structures, including additions and alterations - Retain as notified.	Fire and Emergency supports NCZ-R1 insofar as it requires compliance with NCZ-S9, which requires all activities to comply with the water supply, standards in the Code of Practice for Civil Engineering Works.
S56.35	NCZ-R11	Support	NCZ-R11 Emergency Service Facility - Retain as notified	Fire and Emergency supports NCZ-R11 insofar as it allows emergency service facilities to establish in the NCZ as a restricted discretionary activity.
S56.36	NCZ-S3 Setback	Support and seek amendment	NCZ-S3 Setback - Add advice note: <u>Advice note:</u> <u>Building setback requirements are further controlled by the Building Code. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u> <u>Add new matter of discretion:</u>	Fire and Emergency have concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area. Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e., developers) early on in the resource consent process so that they can incorporate the NZBC

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>5. The extent to which the non-compliance compromises the efficient movement of residents and emergency services and the provision for the health and safety of residents in meeting their day-to-day needs.</u></p>	<p>requirements early on in their building design. FENZ therefore request that, as a minimum, an advice note is included with standard NCZ-S3 directing plan users to the requirements of the NZBC. A new matter of discretion is also sought to give Council the ability to assess the effects of non-compliance on the efficient movement of residents and emergency services and the provision for the health and safety of residents in meeting their day-to-day needs.</p>
S56.37	NCZ-S7 Outdoor Living Space	Support and seek amendment	<p>NCZ-S7 Outdoor Living Space - Add advice note: <u>Advice note:</u> <u>Site layout requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></p>	<p>Support the provision of an outdoor living space on the premise that while not directly intended, may provide access for emergency services and space for emergency egress. Fire and Emergency acknowledge that firefighting access requirements are managed through the NZBC however consider it important that these controls are brought to the attention of plan users (i.e., developers) in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. The NZBC requirements will have an influence over how a site is designed and consequential site layout therefore Fire and Emergency consider it important that developers incorporate these requirements into their site layout at resource consent stage so that Council are able to assess this design to ensure compliance with the RMA. Fire and Emergency therefore request that, as a minimum, an advice note is included with NCZ-S7 directing plan users to the requirements of the NZBC.</p>
S56.38	NCZ-S9	Support and seek amendment	<p>NCZ-S9 Water Supply, Stormwater and Wastewater - Amend as follows: All activities must comply with the water supply <u>(including firefighting water supply)</u>, stormwater and wastewater standards in the Code of Practice for Civil Engineering Works.</p>	<p>Supports NCZ-S9 insofar as it requires all activities in the NCZ to comply with the water supply standards in the Code of practice for Civil Engineering Works which requires compliance with SNZ PAS 4509:2008. However, to increase visibility within the UHCC District Plan, Fire and Emergency seeks to amend NCZ-S9 to specifically include firefighting water supply.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S56.39	New objective and policy	Seek amendment	<p>Add a new objective and policy as follows: <u>LCZ-OX Three Waters Infrastructure Three Waters infrastructure is provided as part of subdivision and development, and in a way that is:</u></p> <ul style="list-style-type: none"> ● <u>Integrated</u> ● <u>Effective</u> ● <u>Efficient</u> ● <u>Functional</u> ● <u>Safe</u> ● <u>Sustainable</u> ● <u>Resilient</u> <p><u>LCZ-PX Three Waters Servicing a. All subdivision and development provide integrated Three Waters infrastructure and services to a level that is appropriate to their location and intended use. b. Where there is inadequate three waters infrastructure for the planned built environment, and necessary upgrades and improvements are not feasible in the short to long term, then avoid further intensification until constraints are resolved.</u></p>	<p>Seeks a new objective that promotes the provision of infrastructure for development within the Local Centre Zone. Further, Fire and Emergency seeks the inclusion of a new policy that requires land use activities in the Local Centre Zone be adequately serviced, particularly in relation to reticulated water supply.</p>
S56.40	LCZ-P3 Other activities	Support and seek amendment	<p>LCZ-P3 Other activities - Amend as follows:</p> <p><u>6. There is a functional and operational need for the activity to locate in the Local Centre Zone.</u></p>	<p>Supports LCZ-P3 insofar as it allows for other activities to occur within the LCZ. Due to urban growth, population changes and commitments to response times, Fire and Emergency may have a functional and operational need to locate stations within the LCZ in the future. Therefore, Fire and Emergency seeks an amendment to LCZ-P3 that allows for other activities where there is a functional and operational need to locate in the zone.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S56.41	LCZ-R1 & MUZ-RI	Support	LCZ-R1 Buildings and structures, including additions and alterations - Retain as notified.	Supports MUZ-R1 insofar as it requires compliance with MUZ-S7, which requires all activities to comply with the water supply, standards in the Code of Practice for Civil Engineering Works.
S56.42	LCZ-R14	Support	LCZ-R14 Emergency Service Facility - Retain as notified.	Supports LCZ-R14 insofar as it allows emergency service facilities to establish in the LCZ as a restricted discretionary activity.
S56.43	LCZ-S3 Setback	Support and seek amendment	<p>LCZ-S3 Setback - Add advice note:</p> <p><u>Advice note:</u> <u>Building setback requirements are further controlled by the Building Code. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></p> <p><u>Add new matter of discretion:</u> <u>5. The extent to which the non-compliance compromises the efficient movement of residents and emergency services and the provision for the health and safety of residents in meeting their day-to-day needs.</u></p>	Concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area. Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e., developers) early on in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with standard LCZ-S3 directing plan users to the requirements of the NZBC. A new matter of discretion is also sought to give Council the ability to assess the effects of non-compliance on the efficient movement of residents and emergency services and the provision for the health and safety of residents in meeting their day-to-day needs.
S56.44	LCZ-S7 Outdoor Living Space	Support and seek amendment	<p>LCZ-S7 Outdoor Living Space - Add advice note:</p> <p><u>Advice note:</u> <u>Site layout requirements are further controlled by the Building Code. This includes the provision for firefighter</u></p>	Support the provision of an outdoor living space on the premise that while not directly intended, may provide access for emergency services and space for emergency egress. Fire and Emergency acknowledge that firefighting access requirements are managed through the NZBC however consider it important that these controls are brought to the attention of plan users

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage.</u> Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</p>	<p>(i.e., developers) in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. The NZBC requirements will have an influence over how a site is deigned and consequential site layout therefore Fire and Emergency consider it important that developers incorporate these requirements into their site layout at resource consent stage so that Council are able to assess this design to ensure compliance with the RMA. Fire and Emergency therefore request that, as a minimum, an advice note is included with LCZ-S7 directing plan users to the requirements of the NZBC.</p>
S56.45	LCZ-S9	Support and seek amendment	<p>LCZ-S9 Water Supply, Stormwater and Wastewater Amend as follows: All activities shall comply with the water supply <u>(including firefighting water supply)</u>, stormwater and wastewater standards in the Code of Practice for Civil Engineering Works.</p>	<p>Supports LCZ-S9 insofar as it requires all activities in the LCZ to comply with the water supply standards in the Code of Practice for Civil Engineering Works which requires compliance with SNZ PAS 4509:2008. However, to increase visibility within the UHCC District Plan, Fire and Emergency seeks to amend LCZ-S9 to specifically include firefighting water supply.</p>
S56.46	New objective and policy	Seek amendment	<p>Add a new objective and policy as follows: <u>MUZ-OX Three Waters Infrastructure</u> <u>Three Waters infrastructure is provided as part of subdivision and development, and in a way that is:</u></p> <ul style="list-style-type: none"> ● <u>Integrated</u> ● <u>Effective</u> ● <u>Efficient</u> ● <u>Functional</u> ● <u>Safe</u> ● <u>Sustainable</u> ● <u>Resilient MUZ-PX Three Waters Servicing a. All subdivision and development provide integrated Three</u> 	<p>Seeks a new objective that promotes the provision of infrastructure for development within the Mixed Use Zone. Further, Fire and Emergency seeks the inclusion of a new policy that requires land use activities in the Mixed Use Zone be adequately serviced, particularly in relation to reticulated water supply.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<u>Waters infrastructure and services to a level that is appropriate to their location and intended use. b. Where there is inadequate three waters infrastructure for the planned built environment, and necessary upgrades and improvements are not feasible in the short to long term, then avoid further intensification until constraints are resolved.</u>	
S56.47	MUZ-P3 Other Activities	Support and seek amendment	MUZ-P3 Other Activities - Amend as follows: <u>6. There is a functional and operational need for the activity to locate in the Mixed Use Zone.</u>	Supports MUZ-P3 insofar as it allows for other activities to occur within the MUZ. Due to urban growth, population changes and commitments to response times, Fire and Emergency may have a functional and operational need to locate stations within the MUZ in the future. Therefore, Fire and Emergency seeks an amendment to MUZ-P3 that allows for other activities where there is a functional and operational need to locate in the zone.
S56.48	MUZ-R1	Support	MUZ-R1 Buildings and structures, including additions and alterations	Supports MUZ-R1 insofar as it requires compliance with MUZ-S7, which requires all activities to comply with the water supply standards in the Code of Practice for Civil Engineering Works.
S56.49	MUZ-R19	Support	MUZ-R19 Emergency Service Facility - Retain as notified.	Supports MUZ-R19 insofar as it allows emergency service facilities to establish in the MUZ as a restricted discretionary activity.
S56.50	MUZ-S3 Setback	Support and seek amendment	MUZ-S3 Setback Add advice note: <u>Advice note: Building setback requirements are further controlled by the Building Code. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a</u>	Concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area. Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC)

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u></p> <p>Add new matter of discretion: <u>5. The extent to which the non-compliance compromises the efficient movement of residents and emergency services and the provision for the health and safety of residents in meeting their day-to-day needs.</u></p>	<p>however consider it important that these controls are brought to the attention of plan users (i.e., developers) early on in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with standard MUZ-S3 plan users to the requirements of the NZBC. A new matter of discretion is also sought to give Council the ability to assess the effects of non-compliance on the efficient movement of residents and emergency services and the provision for the health and safety of residents in meeting their day-to-day needs.</p>
S56.51	MUZ-S5 Outdoor Living Space	Support and seek amendment	<p>MUZ-S5 Outdoor Living Space Add advice note: <u>Advice note:</u> <u>Site layout requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage.</u> <u>Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted</u></p>	<p>Support the provision of an outdoor living space on the premise that while not directly intended, may provide access for emergency services and space for emergency egress. Fire and Emergency acknowledge that firefighting access requirements are managed through the NZBC however consider it important that these controls are brought to the attention of plan users (i.e., developers) in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. The NZBC requirements will have an influence over how a site is deigned and consequential site layout therefore Fire and Emergency consider it important that developers incorporate these requirements into their site layout at resource consent stage so that Council are able to assess this design to ensure compliance with the RMA. Fire and Emergency therefore request that, as a minimum, an advice note is included with MUZ-S5 directing plan users to the requirements of the NZBC.</p>
S56.52	MUZ-S7	Support and seek amendment	<p>MUZ-S7 Water Supply, Stormwater, Wastewater Amend as follows: All activities shall comply with the water supply <u>(including firefighting water</u></p>	<p>Supports MUZ-S7 insofar as it requires all activities in the MUZ to comply with the water supply standards in the Code of practice for Civil Engineering Works. Fire and Emergency acknowledges that the Code of Practice for Civil Engineering</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			supply), stormwater and wastewater standards in the Code of Practice for Civil Engineering Works.	Works which requires compliance with SNZ PAS 4509:2008. However, to increase visibility within the UHCC District Plan, Fire and Emergency seeks to amend MUZ-S7 to specifically include firefighting water supply.
S56.53	New objective and policy	Seeks amendment	<p>Add a new objective and policy as follows:</p> <p><u>TCZ-OX Three Waters Infrastructure</u> <u>Three Waters infrastructure is provided as part of subdivision and development, and in a way that is:</u></p> <ul style="list-style-type: none"> ● <u>Integrated</u> ● <u>Effective</u> ● <u>Efficient</u> ● <u>Functional</u> ● <u>Safe</u> ● <u>Sustainable</u> ● <u>Resilient</u> <p><u>TCZ-PX Three Waters Servicing</u></p> <p>a. <u>All subdivision and development provide integrated Three Waters infrastructure and services to a level that is appropriate to their location and intended use.</u></p> <p>b. <u>Where there is inadequate three waters infrastructure for the planned built environment, and necessary upgrades and improvements are not feasible in the short to long term, then avoid further intensification until constraints are resolved.</u></p>	Seeks a new objective that promotes the provision of infrastructure for development within the Town Centre Zone. Further, Fire and Emergency seeks the inclusion of a new policy that promotes land use activities in the Town Centre Zone be adequately serviced.
S56.54	TCZ-P3 Other activities	Support and seek amendment	TCZ-P3 Other activities Amend as follows: Only allow for other activities, including larger scale commercial and retail	Supports TCZ-P3 insofar as it allows for other activities to occur within the TCZ. Due to urban growth, population changes and commitments to response times, Fire and Emergency may have

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			activities where: <u>6. There is a functional and operational need for the activity to locate in the Town Centre Zone.</u>	a functional and operational need to locate stations within the TCZ in the future. Therefore, Fire and Emergency seeks an amendment to TCZ-P3 that allows for other activities where there is a functional and operational need to locate in the zone.
S56.55	TCZ-R1 Buildings and structures	Support	TCZ-R1 Buildings and structures, including additions and alterations - Retain as notified.	Supports TCZ-R1 insofar as it requires compliance with TCZ-S9, which requires all activities to comply with the water supply, standards in the Code of Practice for Civil Engineering Works. Fire and Emergency notes that when a restricted discretionary activity status is triggered, discretion extends to the matter of any infringed standard. This is also supported.
S56.56	TCZ-R14 Emergency Service Facility	Support	TCZ-R14 Emergency Service Facility - Retain as notified.	Supports TCZ-R14 i as it allows emergency service facilities to establish in the TCZ as a restricted discretionary activity.
S56.57	TCZ-S3 Setback	Support and seek amendment	TCZ-S3 Setback Add advice note: <u>Advice note:</u> <u>Building setback requirements are further controlled by the Building Code.</u> <u>Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u>	Concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area. Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e., developers) early on in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with standard TCZ-S3 directing plan users to the requirements of the NZBC.
S56.58	TCZ-S7 Outdoor Living Space	Support and seek amendment	TCZ-S7 Outdoor Living Space Add advice note: <u>Advice note:</u>	Support the provision of an outdoor living space on the premise that while not directly intended, may provide access for emergency services and space for emergency egress. Fire and

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>Site layout requirements are further controlled by the Building Code. This includes the provision for firefighter access to buildings and egress from buildings. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage.</u> Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</p>	<p>Emergency acknowledge that firefighting access requirements are managed through the NZBC however consider it important that these controls are brought to the attention of plan users (i.e., developers) in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. The NZBC requirements will have an influence over how a site is deigned and consequential site layout therefore Fire and Emergency consider it important that developers incorporate these requirements into their site layout at resource consent stage so that Council are able to assess this design to ensure compliance with the RMA. Fire and Emergency therefore request that, as a minimum, an advice note is included with TCZ-S7 directing plan users to the requirements of the NZBC.</p>
S56.59	TCZ-S9 Water Supply, Stormwater, and Wastewater	Support and seek amendment	<p>TCZ-S9 Water Supply, Stormwater, and Wastewater - Amend as follows: All activities shall comply with the water supply (<u>including firefighting water supply</u>), stormwater and wastewater standards in the Code of Practice for Civil Engineering Works.</p>	<p>Supports TCZ-S9 insofar as it requires all activities in the TCZ to comply with the water supply standards in the Code of practice for Civil Engineering Works which requires compliance with SNZ PAS 4509:2008. However, to increase visibility within the UHCC District Plan, Fire and Emergency seeks to amend TCZ-S9 to specifically include firefighting water supply.</p>
S56.60	New objective and policy	Seek amendment	<p>Add a new objective and policy as follows: <u>CCZ-OX Three Waters Infrastructure</u> <u>Three Waters infrastructure is provided as part of subdivision and development, and in a way that is:</u></p> <ul style="list-style-type: none"> ● <u>Integrated</u> ● <u>Effective</u> ● <u>Efficient</u> ● <u>Functional</u> ● <u>Safe</u> ● <u>Sustainable</u> 	<p>Seeks a new objective that promotes the provision of infrastructure for development within the City Centre Zone. Further, Fire and Emergency seeks the inclusion of a new policy that requires development in the City Centre Zone be adequately serviced, particularly in relation to reticulated water supply.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<ul style="list-style-type: none"> ● <u>Resilient CCZ-PX Three Waters Servicing</u> <ol style="list-style-type: none"> a. <u>All subdivision and development provide integrated Three Waters infrastructure and services to a level that is appropriate to their location and intended use.</u> b. <u>Where there is inadequate three waters infrastructure for the planned built environment, and necessary upgrades and improvements are not feasible in the short to long term, then avoid further intensification until constraints are resolved.</u> 	
S56.61	CCZ-P3 Other Activities	Support and seek amendment	CCZ-P3 Other Activities - Amend as follows: <u>5. There is a functional and operational need for the activity to locate in the City Centre Zone.</u>	Supports CCZ-P3 insofar as it allows for other activities to occur within the CCZ. Due to urban growth, population changes and commitments to response times, Fire and Emergency may have a functional and/or operational need to locate stations within the CCZ in the future. Therefore, Fire and Emergency seeks an amendment to CCZ-P3 that allows for other activities such as fire stations where there is a functional and operational need to locate in the area.
S56.62	CCZ-R7 Erection, Construction and Development of Additions to Existing Buildings	Support and seek amendment	CCZ-R7 Erection, Construction and Development of Additions to Existing Buildings - Add new matter of discretion to CCZ-R7(2) as follows: Matters of discretion are restricted to: <u>8. The extent, and effects of the non-compliance with CCZ-S6.</u>	Support CCZ-R7(2)(b)(vi) as it requires compliance with CCZ-S6 for restricted discretionary activities. As CCZ-R14 has been deleted as part of the plan change, it appears as though CCZ-R7(2)(a) is in error. Similarly, CCZ-R7(3)(a). If this is the case, Fire and Emergency request that this be amended to refer to the correct standard Fire and Emergency further seek a new matter of discretion that allows Council to consider the degree, extent, and effects of the non-compliance with CCZ-S6.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S56.63	CCZ-S2	Support and seek amendment	<p>CCZ-S2 Where the side or rear boundary of a site adjoins a High Density Residential Zone, General Residential Zone, or Open Space Zone, the following Setback standard applies. Add advice note:</p> <p><u>Advice note:</u> <u>Building setback requirements are further controlled by the Building Code. Plan users should refer to the applicable controls within the Building Code to ensure compliance can be achieved at the building consent stage. Issuance of a resource consent does not imply that waivers of Building Code requirements will be considered/granted.</u> Add new matter of discretion: <u>The extent to which the non-compliance compromises the efficient movement of residents and emergency services and the provision for the health and safety of residents in meeting their day-to-day needs.</u></p>	<p>Concerns around the increased risk of fire spreading as a result of reduced boundary setbacks. Reduced setbacks can inhibit Fire and Emergency personnel from getting to the fire source or other emergency. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area. Fire and Emergency acknowledge that firefighting access requirements and building setback controls are managed through the New Zealand Building Code (NZBC) however consider it important that these controls are brought to the attention of plan users (i.e., developers) early on in the resource consent process so that they can incorporate the NZBC requirements early on in their building design. Fire and Emergency therefore request that, as a minimum, an advice note is included with standard CCZ-S2 directing plan users to the requirements of the NZBC. Fire and Emergency request that matters of discretion be added to this standard and that this includes consideration of the extent to which the noncompliance compromises the efficient movement of residents and emergency services and the provision for the health and safety of residents in meeting their day-to-day needs.</p>
S56.64	CCZ-S6 Water Supply, Stormwater and Wastewater	Support and seek amendment	<p>CCZ-S6 Water Supply, Stormwater and Wastewater - Amend as follows: All activities shall comply with the water supply (including firefighting water supply), stormwater and wastewater standards in the Code of Practice for Civil Engineering Works.</p>	<p>Supports CCZ-S6 insofar as it requires all activities in the CCZ to comply with the water supply standards in the Code of Practice for Civil Engineering Works. Fire and Emergency acknowledges that the Code of Practice for Civil Engineering Works requires compliance with SNZ PAS 4509:2008. However, to increase visibility within the District Plan, Fire and Emergency seeks to amend CCZ-S6 to specifically include firefighting water supply.</p>
S56.65	CCZ-R13 Redevelopment,	Support and seek amendment	<p>CCZ-R13 Redevelopment, Alteration and Repair of Existing Buildings - Add new</p>	<p>Support CCZ-R13(2)(b)(vi) as it requires compliance with CCZ-S6 for restricted discretionary activities. Fire and Emergency seek a</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
	Alteration and Repair of Existing Buildings		matter of discretion to CCZ-R13(2) as follows: Matters of discretion are restricted to: <u>8. The extent, and effects of the non-compliance with CCZ-S6.</u>	new matter of discretion that allows Council to consider the extent and effects of the non-compliance with CCZ-S6.
S56.66	CCZ-R16 New Buildings and Structures	Support and seek amendment	CCZ-R16 New Buildings and Structures - Add new matter of discretion to CCZ-R16(1) as follows: Matters of discretion are restricted to: <u>9. The extent, and effects of the non-compliance with CCZ-S6.</u>	Support CCZ-R16(1)(a)(vi) as it requires compliance with CCZ-S6 for restricted discretionary activities. Fire and Emergency seek a new matter of discretion that allows Council to consider the extent and effects of the non-compliance with CCZ-S6.
S56.67	CCZ-R17 Emergency Service Facility	Support	CCZ-R17 Emergency Service Facility - Retain as notified	Supports CCZ-R17 insofar as it allows emergency service facilities to establish in the CCZ as a restricted discretionary activity.
S56.68	Entire IPI	Not stated	This submission seeks to enable Fire and Emergency to carry out its requirements under the Fire and Emergency New Zealand Act 2017 more effectively in the protection of people, property, and the environment in the event of an emergency.	Fire and Emergency requires adequate access to new developments, associated structures and the natural environment to ensure that they can respond in emergencies. This includes access in the event of fire, natural hazard, hazardous substances, medical or a rescue or assist. Fire and Emergency acknowledge that the New Zealand Building Code (NZBC) C5 specifies access and safety requirements for firefighting operations, where certain buildings must be designed and constructed so that there is a low probability of firefighters or other emergency services personnel being delayed in or impeded from assisting in rescue operations and performing firefighting operations. Buildings must also be designed and constructed so that there is a low probability of illness or injury to firefighters or other emergency services personnel during rescue and firefighting operations. Of particular note, a performance requirement of C5 is that buildings must be provided with access for fire service vehicles

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				to a hard standing from which there is an unobstructed path to the building within 20m of the firefighter access into the building and the inlets to automatic fire sprinkler systems or fire hydrant systems, where these are installed (among other requirements). These performance requirements do however not apply to detached dwellings, within household units in multi-unit dwellings, or to outbuildings, and ancillary buildings.
S56.69	Entire IPI	Not stated	This submission addresses matters relating to activities required to be undertaken to enable an effective emergency response and to provide for the health and safety of people and communities in Upper Hutt.	Seek: <ul style="list-style-type: none"> ● ensuring emergency services appliances and Fire and Emergency personnel can adequately access both built and natural environments across Upper Hutt in the event of an emergency, and ● ensuring new development, including infill development, is adequately serviced by firefighting water supply, ● maintaining and developing Fire and Emergency’s property estate (e.g., fire stations) in strategic locations and at appropriate times to enable Fire and Emergency to continue to meet the demands and expectations of communities as they grow and change.
S56.70	Entire IPI	Not stated	To support effective and efficient access and manoeuvring of crew and equipment for firefighting, medical, rescue and other emergency response to pedestrian only access developments across Upper Hutt (should such developments be provided for).	Where resource consent is required for sites with no on-site vehicle access, matters of discretion should include consideration of the extent to which emergency service vehicle access is provided for. The design guide should also consider and reflect good practice examples that, where no vehicle access is provided to a lot/site, that an unobstructed path must be provided either, between buildings on the same site or between buildings and the property boundary to provide for sufficient firefighter access to the site/buildings. This can then be assessed on a case-by-case basis and the district plan design guide could assist in the regard. Seek:

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<ul style="list-style-type: none"> ● pedestrian accessways are designed to be clear and unobstructed, ● pedestrian accessways have a minimum width of: – 3m on a straight accessway. – 6.2m on a curved or cornered accessway, – 4.5m space to position the ladder and perform operational tasks. ● wayfinding for different properties on a development are clear in day and night, ● developments give effect to the guidance provided in Fire and Emergency’s ‘Designer’s Guide’ to Firefighting Operations Emergency Vehicle Access’ (December 2021) (Firefighting Operations Emergency Vehicle Access Guide).
S56.71	Entire IPI	Not stated	Adequate fire appliance access to both the source of a fire (or other emergency) and a firefighting water supply is essential to the efficient operation of Fire and Emergency. The requirements for firefighting access are set out in the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (SNZ PAS 4509:2008), are further detailed in Fire and Emergency’s ‘Designer’s guide’ to firefighting operations Emergency vehicle access’ (December 2021) and prescribed in Acceptable Solutions Part 6 of C/AS1 and C/AS2.	These requirements are necessary for Fire and Emergency to be able to operate pumping appliances from a hard standing. Often, this can be done from the public road, and this is how Fire and Emergency prefers to operate where possible. Pumping appliances are vehicles used to pump water for firefighting. They carry a relatively small amount of water (1,350–2,000 litres) and have a limited length of hose. Accordingly, Fire and Emergency must have access to a water supply and must also be able to base operations near the building, so firefighters can reach the fire with water.
S56.72	Entire IPI	Seeks amendment	For all other developments to which C5 applies, Fire and Emergency request that, where not already provided for, the district plan introduce	Fire and Emergency consider that this approach would prevent resource consents being issued that could not be implemented because the layout does not demonstrate compliance with the performance requirements and need to be redesigned to

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			rules that 'duplicate' the appropriate requirements of the Part 6: firefighting of C/AS1 and C/AS2.	provide sufficient firefighter access. This could mitigate some risks, especially when activities that currently require resource consent move to permitted
S56.73	Entire IPI	Not stated	Fire and Emergency is already encountering new development where emergency vehicle access along the roading corridor has been challenging. Issues with emergency vehicle access in these locations can be caused by narrow roads / laneways, higher density typologies and a lack of off-street parking available resulting in cars parking along both sides of already narrow residential streets. Implications for emergency services include on-road obstructions, meaning emergency vehicles have difficulty or are unable to manoeuvre, as well as an inability to access buildings and locate fire hydrants in an emergency. Inadequate parking lengths along frontages also have been encountered generally from vehicles parking over footpaths in driveways, blocking access. Fire and Emergency acknowledges that, where no off-street parking is required, there may also be no requirement to provide for vehicular access to a property. In these situations, emergency service staff would need to enter a property on foot and/or remove fences and other structures to provide access. Regardless, there needs to be sufficient clearance to access properties with heavy emergency	Not stated

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			equipment. Fire and Emergency request that UHCC retain a policy framework that would enable such conditions to be imposed on a case-by-case basis, having regard to the effects of a particular activity. This could include, for example, matters of discretion relating to the safety of pedestrians and cyclists, surrounding car parking supply, and on and off-street amenity effects.	
S56.74	Entire IPI	Not stated	Clause C3 of the NZBC is relevant here whereby buildings must be designed and constructed so that there is a low probability of fire spread to other property vertically or horizontally across a relevant boundary. Achieving this functional requirement is however limited by the mechanisms by which this is achieved (i.e., Acceptable Solutions) and buildings of which such requirements apply. Fire and Emergency encourage UHCC to consider integrating these considerations into relevant urban design guidelines to align with the NZBC and prompt developments to consider fire risk mitigations early on in design. This should also be included as an advice note with the relevant side and rear boundary setback rules within the IPI plan change.	The minimum building setbacks from boundaries and between buildings in the Medium Density Residential Standards to 1m on side boundaries from buildings on all sides increase the risk of fire spreading and can inhibit Fire and Emergency personnel from getting to the fire source. The difficulty of access may also increase the time for fire to burn, thereby increasing the heat radiation in a confined area.
S56.75	Entire IPI	Not stated	Fire and Emergency consider it essential that urban development does not occur out of sequence with the delivery of key	It is critical for Fire and Emergency that water supply infrastructure is in place prior to any development commencing and that this water supply has adequate capacity and pressures

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>strategic infrastructure (network extensions or upgrades), or development is not enabled where there is potential or known infrastructure capacity constraints in relation to the Three Waters, in particular the water supply network. Fire and Emergency consider that UHCC will need to develop more sophisticated water network models where they do not already exist. This will assist UHCC in identifying areas across Upper Hutt where there is potential or known infrastructure capacity constraints and will enable UHCC to manage the cumulative impacts of urban infill on the water supply network.</p>	<p>available to service the future growth. Fire appliances carry a limited amount of water; therefore, it is necessary that adequate water capacity and pressure be available to Fire and Emergency to control or extinguish a fire. In the urban areas of Upper Hutt, water is sourced from the reticulated water supply network however where reticulation is not available or limited (i.e., trickle fed), alternative water sources will be required. This may be in the form of dedicated water tanks or ponds for firefighting. Adequate physical access to this water supply for new development (whether reticulated or non-reticulated) is also essential.</p>
S56.76	Entire IPI	Not stated	<p>Provisions within the rules of the district plan therefore may be the best way to facilitate the development of any new emergency service facilities as the city grows. Ongoing, and more frequent engagement with Fire and Emergency in terms of growth projections and demographic changes will assist us in understanding where we may need new emergency service facilities in the future. This will be particularly important during plan review and plan changes that seek to re-zone large portions of land to facilitate development.</p>	<p>As urban areas develop and intensify, the ability to construct and operate fire stations in locations which will enable reasonable response times to fire, and other emergencies is critical for the health, safety, and wellbeing of people in the community. In this regard it is noted that Fire and Emergency is not a requiring authority under section 166 of the RMA and therefore does not have the ability to designate land for the purposes of fire stations.</p>
Submitter 57: Ryman Healthcare Limited				

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S57.1	Entire IPI	Not stated	Ryman seeks the decisions sought by the RVA (Retirement Village Association) in its submission on the Proposed IPI.	Ryman supports in full the Retirement Villages Association of New Zealand Incorporated (RVA) submission on the Proposed IPI. Ryman wishes to emphasise that the Proposed IPI will have a significant impact on the provision of housing and care for Upper Hutt City's growing ageing population. There is a real risk that the proposed changes will delay necessary retirement and aged care accommodation in the region.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
Submitter 58: Kainga Ora				
S58.1	Entire IPI	Support and seek amendment	<p>(1) Changes to the centre's hierarchy and commercial provisions in the Commercial and Mixed-Use zones to improve regional consistency to enable and support increased intensification across the City.</p> <p>(2) Expand the spatial extent of some centres and amend residential intensification standards, as sought in the rest of the submission, to reflect an increase in intensification anticipated in and around centres and rapid transit stops.</p> <p>(3) If the relief sought in this submission regarding expansion of the spatial extent to centres is not granted, Kāinga Ora seeks that alternative outcomes and relief sought in this submission (e.g., height variation control in the HRZ) are applied and granted. Where the alternative relief is sought, this is captured more specifically in Appendix 1.</p> <p>(4) Undertake any consequential changes necessary across the UHCC District Plan to address the matters raised above.</p>	<p>Generally support the approach to implement the NPS-UD and the Housing Supply Act by incorporating intensification provisions into the HCC District Plan.</p> <p>The Kāinga Ora submission as a whole seeks improvements to better align with local context and achieve regional consistency with this direction. This includes a comprehensive review of the evidence base for the Centres hierarchy.</p> <p>Generally support the approach to implement the NPS-UD and the Housing Supply Act by incorporating intensification provisions into the HCC District Plan. The Kāinga Ora submission as a whole seeks improvements to better align with local context and achieve regional consistency with this direction. This includes a comprehensive review of the evidence base for the Centres hierarchy.</p>
S58.2	Entire IPI	Support and seek amendment	<p>1. Expand the High Density Residential Zone and additional height controls, as shown in Appendix 4, within walkable catchments of centres and train stations, which reflect general principles of:</p> <p>a. 15min/1200m walkable catchment from</p>	<p>Walkable catchments from centres and train stations - Generally support the establishment of the High Density Residential Zone in proximity to train stations and centres, but queries the principles applied, noting that many walkable catchments stop at Fergusson Drive and there is little understanding from the s32 analysis on how Council decided to</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>the edge of the City Centre Zone (CCZ) – with increased heights within 800m/10min walkable catchment of the CCZ, demonstrated with a Height Variation Control overlay;</p> <p>b. 10min/800m walkable catchment from the edge of Town Centre Zone (TCZ) – with increased heights within 400m/5-10min walkable catchment of the TCZ, demonstrated with a Height Variation Control overlay;</p> <p>c. 10min/800m walkable catchment from existing and planned rapid transit stops.</p> <p>2. Apply additional height up to 18m in the Medium Density Residential Zone within 400m/5-10min walkable catchment of Local Centre Zone (LCZ).</p> <p>3. Where a lower order centre falls within a walkable catchment of a walkable catchment of a higher-order centre or train station, enable heights consistent with the height enabled in adjacent residential zones.</p> <p>4. Accept all changes sought from Kāinga Ora to the planning maps as shown in Appendix 4.</p> <p>5. Other than the changes sought in this submission and in Appendix 4, retain the zoning as notified.</p>	<p>apply walkable catchments. Seek that walkable catchments are expanded to enable intensification within walking distance to centres and train stations.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			6. Make consequential amendments required to give effect to the changes sought in the submission.	
S58.3	Entire IPI	Support and seek amendment	<p>1. Amend standards across the plan to be proportionate to the building height changes sought in this submission and detailed in the planning maps in Appendix 4 of this submission.</p> <p>2. Undertake any consequential changes necessary across the District Plan to address the matters raised above.</p>	A number of changes to the building height controls have been requested in this submission to help ensure the NPS-UD and the Housing Supply Act are effectively and efficiently implemented. 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.
S58.4	Design guides	Oppose	<p>1. Request the Design Guides and design guidelines are removed from within the District Plan and are treated as non-statutory tool, outside of the District Plan.</p> <p>2. Delete all references to the Design Guides and design guidelines.</p> <p>3. Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment.</p> <p>4. If the Council does not provide the relief sought, in deleting the Design Guides and design guidelines and references to such guidelines in the District Plan, Kāinga Ora seeks that the design guidelines are amended, simplified</p>	Design Guides - Oppose the inclusion of Design Guides or design guidelines in the Plan, which act as de facto rules to be complied with. Kāinga Ora opposes any policy or rule approach which would require development proposals to comply with such design guidelines in the District Plan.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>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, it is considered that there is no flexibility and scope to create a design that fits with specific site characteristics and desired built form development.</p> <p>5. Kāinga Ora seeks the opportunity to review these guidelines if they are to remain a statutory document.</p>	
S58.5	Entire IPI	Support and seek amendment	<ol style="list-style-type: none"> 1. Amend the proposed objectives, policies, rules and standards as necessary to achieve compliance with the requirements of the National Planning Standards as sought by this submission. 2. Amend the proposed objectives, policies, rules and standards as necessary to improve consistency and conciseness across the IPI as sought by the submission. 	The IPI includes numbering of policies, rules, standards and matters of discretion that are inconsistent with the National Planning Standards. The IPI also contains policies that are unnecessarily detailed and repeat matters that are repeated within rules and standards. Kāinga Ora considers a review of the conciseness of the proposed plan changes should be undertaken.
S58.6	Indigenous Biodiversity Precinct	Oppose	Replace all references to Indigenous Biodiversity Precinct with Indigenous Biodiversity Overlay with accompanying rules located in the ECO chapter as provided within Appendix 3 - See submission for more detail.	Oppose the inclusion of an Indigenous Biodiversity Precinct as proposed. Seek that the Indigenous Biodiversity Precinct is renamed and provided for as an overlay, as this is considered to be the appropriate method under the National Planning standards, particularly as it is relevant across many different parts of the urban environment.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.7	SUB-HDR, SUB-RES, GRZ, HRZ, MRZ	Support and seek amendment	<p>1. Delete the SUB-HDR chapter and delete the proposed amendment to SUB-RES to make it specific to the General Residential Zone. Combine subdivision in the GRZ and the HRZ into the SUB-RES chapter.</p> <p>2. Rename the GRZ as the MRZ – Medium Density Residential Zone.</p>	Support the updating of the contents section, but requests amendments in line with the submission raised elsewhere in the submission.
S58.8	Appendix 1 and 2	Support	Retain deletion of Appendix 1 - Residential Centres Precinct, and Appendix 2 - Residential Hill and Residential Conservation Precinct as notified.	Support the proposed deletion of reference to the Residential Centres Precinct and the Residential Hill and Residential Conservation Precinct.
S58.9	GRZ	Seek amendment	<p>1. Rename the General Residential Zone as the 'Medium Density Residential Zone'.</p> <p>2. Consequential amendments to incorporate the use of the term 'Medium Density Residential Zone' throughout the District Plan.</p>	Seek that the General Residential Zone is renamed as the Medium Density Residential Zone. In giving effect to the NPS-UD and the Act, the General Residential Zone is becoming a widespread medium density zone, and therefore it is more appropriately named as the Medium Density Residential Zone. This would be consistent with the National Planning Standards and the zones proposed by other Councils in the region.
S58.10	General Approach	Support	Retain deletion of 2.4.7 and 2.4.8 as notified.	Support deletion of comprehensive residential development provisions in sections 2.4.7 and 2.4.8.
S58.11	Definitions	Support	Retain definition for 'ancestral land' as notified.	Support proposed 'ancestral land' definition.
S58.12	Definitions	Support	Retain deletion of definition for 'comprehensive residential development' as notified.	Support deletion of definition for 'comprehensive residential development'.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.13	Definitions	Oppose	Delete definition for 'dwelling' and make consequential amendments to replace with the term 'residential unit'.	Oppose definition for 'dwelling' as it is not consistent with the National Planning Standards.
S58.14	Definitions	Oppose	Delete definition for 'high density residential zone'.	Oppose the definition for 'high density residential zone' as it is already a chapter in the district plan. Fails to recognise that the zone is a chapter and framework and therefore more than the areas identified on the planning maps.
S58.15	Definitions	Support and seek amendment	Amend definition for hydraulic neutrality to delete reference to on-site disposal or storage, and references to the 10% and 1% AEP flood events. See submission for specific requested wording.	Generally support defining hydraulic neutrality, but seek amendments to recognise that hydraulic neutrality can be achieved by more than on-site disposal or storage, and to recognise that hydraulic neutrality for new development that does not increase stormwater runoff can be achieved without disposal or storage.
S58.16	Definitions	Oppose	<ol style="list-style-type: none"> 1. Rename the 'General Residential Zone' as the 'Medium Density Residential Zone'. 2. All references of this residential zone to be amended throughout the IPI. 	Oppose definition for General Residential Zone and request it be renamed Medium Density Residential Zone. See submission for specific reasons.
S58.17	Definitions	Support and seek amendment	Amend definition to refer to residential and conservation activities. Include reference to supporting cultural, environmental, and economic wellbeing. See submission for specific requested amendments.	Seek changes to the definition for 'papakāinga' to better reflect the activities that occur within papakāinga.
S58.18	Definitions	Oppose	Amend definition for 'relevant residential zone' to replace reference to 'general residential zone' with 'medium density residential zone'.	Definition for 'Relevant Residential Zone' - Oppose definition for General Residential Zone and request it be renamed Medium Density Residential Zone for the reasons specified in the submission.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.19	Definitions	Support	Retain definition for 'reverse sensitivity' as notified	Generally support definition for 'reverse sensitivity'.
S58.20	Definitions	Oppose	Delete definition for 'walkable catchment' and make necessary consequential amendments across the district plan.	Definition for 'walkable catchment' - Oppose as consider a definition unnecessary, and they can change and vary over time.
S58.21	Entire IPI	Support	Retain abbreviation for National Policy Statement on Urban Development as notified.	Generally support the abbreviation for the NPS-UD from within the list of abbreviations.
S58.22	UFD-O1	Support	Retain UFD-O1 as notified.	Support UFD-O1 as it incorporates objectives in Schedule 3A of the Act.
S58.23	UFD-O2	Support	Retain UFD-O2 as notified.	Support UFD-O2 as it incorporates objectives in Schedule 3A of the Act.
S58.24	UFD-O3	Support	Retain UFD-O3 as notified.	Support UFD-O3.
S58.25	UFD-O4	Support	Retain UFD-O4 as notified.	Support UFD-O4.
S58.26	Design Guide	Oppose	Delete the reference to the Design Guide in Appendix 1 of the IPI and replace with a list of the specific design matters which Council seek be achieved.	Oppose any policy approach which would require development proposals to comply with such design guidelines in the District Plan. If there is content of a Design Guide that Council seeks to be included in the Plan, Kāinga Ora seeks that these are relocated within a specific rule, matter of discretion or assessment criterion.
S58.27	UFD-P2	Seek amendment	Amend UFD-P2 to enable building heights of 'at least' 12m, 26m, and 36m in height within 400m of the edge of the City Centre Zone. See submission for specific requested amendments.	UFD-P1 - Seek amendments to provide for enhanced development flexibility and opportunities. It is noted that building heights of 26m are permitted by the proposed standard of the LCZ-S1, and this policy therefore requires an amendment to correct this. Amendments sought to clarify that buildings heights are enabled to at least the maximum height

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				standard, and not up to, as this does not create a policy framework with flexibility where height standards can be infringed through a resource consenting process.
S58.28	Entire IPI	Support and seek amendment	Amend the strategic direction provisions to state that residential development is also provided with centre and mixed use zones. See submission for specific requested amendments.	Generally support the amendments to the strategic direction. Amendments are sought to clarify that residential development is provided for and encouraged within centres as well as residential zones.
S58.29	CMU-O1	Support	Retain CMU-O1 as notified.	CMU-O1 - Generally support the proposed objective.
S58.30	CMU-O2	Support	Retain CMU-O2 as notified.	CMU-O2 - Generally support the proposed objective.
S58.31	CMU-O3	Support	Retain CMU-O3 as notified.	CMU-O3 - Generally support the proposed objective.
S58.32	CMU-O4	Support and seek amendment	Delete reference to 'Silverstream' in CMU-O4.	CMU-O4 - Generally support the proposed objective, but seeks amendments to remove reference to Silverstream from the Town Centre description to allow for other centres to be classified as a Town Centre.
S58.33	CMU-O5	Support	Retain CMU-O5 as notified.	CMU-O5 - Generally support the proposed objective.
S58.34	NH-R7	Support and seek amendment	Amend NH-R7 to replace reference to 'residential accommodation' with 'residential activities'.	NH-R7 - Amend to remove reference to 'residential accommodation' as this is not a defined term in the District Plan. The term should be replaced with 'residential activities'.
S58.35	NH-S6	Oppose	Remove NH-S6 from a Restricted Discretionary Activity and include as a standard for a Permitted Activity.'	NH-S6 - Oppose the inclusion of this standard as a standard for a Restricted Discretionary Activity and considers that with the inclusion of minimum finished floor levels clear of defined flood extents, this should be a standard for a Permitted Activity.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.36	NH-S7	Oppose	Remove NH-S7 from a Restricted Discretionary Activity and include as a standard for a Permitted Activity.'	NH-S7 - Oppose the inclusion of this standard as a standard for a Restricted Discretionary Activity and considers that with the inclusion of minimum finished floor levels clear of defined flood extents, this should be a standard for a Permitted Activity.
S58.37	SUB-GEN	Oppose and seek amendment	Inclusion of a non-notification preclusion statement for all Controlled and Restricted Discretionary Activity rules within the SUB-GEN - General Subdivision Chapter. See submission for specific requested amendments.	SUB-GEN-General Subdivision: All controlled and restricted discretionary activity rules - Oppose the lack of use of a notification preclusion statement for both public and limited notification for controlled and restricted discretionary activities and seeks that this is applied to all controlled and 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.
S58.38	SUB-GEN-R2A	Support and seek amendment	Amend SUB-GEN-R2A to simplify reference to hydraulic neutrality. See submission for specific requested amendments.	SUB-GEN-R2A - Support retaining control to achieve hydraulic neutrality, but as it is defined in the plan, seek amendment to simplify the rule.
S58.39	SUB-RES	Oppose and seek amendment	Amend all Controlled and Restricted Discretionary Activity rules in SUB-RES-Subdivision in the General Residential Zone chapter to include a non-notification preclusion statement for all in this chapter. See submission for specific requested amendments.	SUB-RES- Subdivision in the General Residential Zone - all controlled and restricted discretionary activity rules. Oppose the lack of use of a notification preclusion statement (for both public and limited notification) for controlled and restricted discretionary activities and seeks that this is applied to all controlled and 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.
S58.40	SUB-RES-O2	Support	Retain SUB-RES-O2 as notified.	SUB-RES-O2 - Supports the inclusion of the RMA- mandated objective.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.41	SUB-RES-O3	Support	58.41 Retain SUB-RES-O3 as notified.	SUB-RES-O3 - Generally support the proposed objective.
S58.42	SUB-RES-P1	Support and seek amendment	Amend SUB-RES-P1 to delete reference to 'appearance' and replace 'planned built character of the area' with 'planned urban built form within the zone'. See submission for specific requested amendments.	SUB-RES-P1 - Seek amendments to make it more explicitly related to subdivision as opposed to development. Also seek amendments to refer to the planned urban built form within the zone to be consistent with NPS-UD Policy 6.
S58.43	SUB-RES-P2	Support	Retain SUB-RES-P2 as notified.	SUB-RES-P2 - Generally support the proposed amendment to the policy.
S58.44	SUB-RES-P3	Support	Retain SUB-RES-P3 as notified.	SUB-RES-P3 - Generally support the proposed amendment to the policy.
S58.45	SUB-RES-P4	Support	Retain SUB-RES-P4 as notified.	SUB-RES-P4 - Generally support the proposed amendment to the policy.
S58.46	SUB-RES-P5	Support and seek amendment	Amend SUB-RES-P5 to refer to the 'planned urban built form', and other minor amendments. See submission for specific requested amendments.	SUB-RES-P5 - Generally support but seek amendments to make explicit reference to the anticipated change to the planned urban built form, appearance, and amenity within the zone, consistent with Policy 6 of the NPS-UD; and notes that the matters contained within do not form a Qualifying Matter in which to limit application of Policy 3(c) of the NPS-UD.
S58.47	SUB-RES-P6	Support and seek amendment	Amend SUB-RES-P6 to refer specifically to subdivision. See submission for specific requested amendments.	SUB-RES-P6 - seek amendments to make the policy more specific to subdivision.
S58.48	SUB-RES-P7	Oppose	Delete SUB-RES-P7.	SUB-RES-P7 - Oppose as the policy relates to land use activities as opposed to subdivision and would not be practical for a vacant lot subdivision.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.49	SUB-RES-P8	Oppose	Delete SUB-RES-P8.	SUB-RES-P8 - Oppose as the policy relates to land use activities as opposed to subdivision and would not be practical for a vacant lot subdivision.
S58.50	SUB-RES-P9	Oppose	Delete SUB-RES-P9.	SUB-RES-P9 - Oppose as the policy relates to land use activities as opposed to subdivision and would not be practical for a vacant lot subdivision.
S58.51	SUB-RES	Oppose	Delete all policy references from within all SUB-RES rules.	SUB-RES- All rules. Oppose the references to the GRZ policies within all subdivision rules, particularly policies from other chapters. Will create a cumbersome resource consent application process.
S58.52	SUB-RES-R1	Support and seek amendment	Amend SUB-RES-R1 to delete reference to 'appearance' and 'landscaping'. See submission for specific requested amendments.	SUB-RES-R1 - Generally supports the proposed rule and the introduction of the non-notification clauses for both public and limited notification but seeks amendments to the matters of control to ensure they are more specifically related to subdivision effects and not land use activities.
S58.53	SUB-RES-R2	Support and seek amendment	Amend SUB-RES-R2 to delete reference to 'appearance' and 'landscaping'. See submission for specific requested amendments.	SUB-RES-R2 - Seek amendments to the matters of control to ensure they are more specifically related to subdivision effects and not land use activities.
S58.54	SUB-RES-S1	Support and seek amendment	Amend SUB-RES-S1 to delete the minimum site area threshold, and to add a shape factor of 8m x 15m for vacant allotments.	SUB-RES-S1 - Support this standard applying only to vacant allotments created by subdivision. However, Kāinga Ora seeks the removal of the minimum site area threshold proposed. Instead Kāinga Ora considers the minimum shape factor is more appropriate. Kāinga Ora also seeks a slight revision to the shape factor to bring a degree of local and regional consistency.
S58.55	SUB-RES-S3	Support	Retain SUB-RES-S3 as notified.	SUB-RES-S3 - Generally support amendments to this standard.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.56	SUB-RES-R6	Support and seek amendment	Amend SUB-RES-R6 to remove appearance and landscaping from the matters of discretion.	SUB-RES-R6 - Seek the deletion of landscaping as a matter of discretion as this is more appropriately assessed through the residential zone rules, where the objectives and policies give guidance on the amenity of the zone which the landscaping will contribute towards.
S58.57	SUB-RES-R6	Support and seek amendment	Amend SUB-RES-R6 to remove the outcome of consultation from the matters of discretion.	SUB-RES-R6 - Oppose the matters of discretion related to regionally significant infrastructure and renewable electricity generation activities - "in proximity" is too vague and should be directly reflective of a rule related to significant infrastructure. This would also allow Council to impose conditions based on consultation, where the consultation may not be balanced and needs further consideration based on actual effects of the development.
S58.58	SUB-RES-R8, SUB-RES-R9, and SUB-RES-R10	Support and seek amendment	Amend SUB-RES-R8, SUB-RES-R9, and SUB-RES-R10 to: (1). Remove appearance and landscaping from the matters of discretion. (2). Remove reference to consent notices being used for restricting development. (3). Remove the outcome of consultation from the matters of discretion.	SUB-RES-R8, SUB-RES-R9, SUB-RES-R10 - Seeks the deletion of landscaping and appearance, consent notices restricting the future development to the identified platform, and the outcome of consultation from the matters of discretion of these rules.
S58.59	SUB-RES-R11, SUB-RES-S7	Support	Retain amendments to SUB-RES-R11, SUB-RES-S7, and Matters for Consideration that relate to comprehensive residential development as notified.	Support deletion of comprehensive residential development provisions from rule SUB-RES-R11, SUB-RES-S7, and the Matters for Consideration.
S58.60	SUB-HRZ	Oppose	Delete SUB-HRZ chapter 'and include rules in the SUB-RES'.	Oppose the entire SUB-HRZ chapter. Do not support the need for a separate chapter for Subdivision in the High Density Residential Zone. It is considered more appropriate for subdivision in the GRZ and HRZ to be both combined into the

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				SUB-RES with specific rules for the GRZ and HRZ within that chapter.
S58.61	SUB-CMU	Oppose	Amend all SUB-CMU Controlled and Restricted Discretionary Activity Rules to include a non-notification preclusion statement. See submission for requested amendments.	SUB-CMU - All Controlled and Restricted Discretionary Rules opposes the lack of use of a notification preclusion statement (for both public and limited notification) for controlled and restricted discretionary activities and seeks that this is applied to all controlled and 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.
S58.62	SUB-CMU-P1	Support	Retain SUB-CMU-P1 as notified.	SUB-CMU-P1 - Generally support the proposed policy wording.
S58.63	SUB-CMU	Support	Retain SUB-CMU Rules as notified.	SUB-CMU- Rules - Generally support the proposed table.
S58.64	SUB-CMU-R1, SUB-CMU-R2, SUB-CMU-R3, SUB-CMU-R4, and SUB-CMU-R5	Support and seek amendment	Remove landscaping from the matters of control or discretion from rules SUB-CMU-R1, SUB-CMU-R2, SUB-CMU-R3, SUB-CMU-R4, and SUB-CMU-R5.	SUB-CMU-R1, SUB-CMU-R2, SUB-CMU-R3, SUB-CMU-R4, SUB-CMU-R5 - Generally support the proposed amendments to these rules but seeks the deletion of landscaping as a matter of control or discretion.
S58.65	SUB-CMU-R6	Support	Retain SUB-CMU-R6 as notified.	SUB-CMU-R6 - Generally support the proposed rule.
S58.66	SUB-CMU-S1	Support	Retain SUB-CMU-S1 as notified.	SUB-CMU-S1 - Generally support the proposed standard.
S58.67	SUB-CMU-S2	Support	Retain SUB-CMU-S2 as notified.	SUB-CMU-S2 - Generally support the proposed standard.
S58.68	SUB-CMU-S3	Support	Retain SUB-CMU-S3 as notified.	SUB-CMU-S3 - Generally support the proposed standard.
S58.69	Development Contributions	Oppose and seek amendment	Amend the DC- Development Contributions chapter to:	DC - Development Contributions - whole chapter. Opposes the inclusion of Development Contributions (DC) within the District Plan, as local authorities are required to make provision for DC

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>(1) Rename the chapter to 'Financial Contributions'.</p> <p>(2) Delete all references to development contributions.</p> <p>(3) See submission for specific amendments to address the relief sought.</p> <p>(4) That the chapter be amended to include specific provisions that clarify how Financial Contributions will be applied including by:</p> <p>A. Provide a consistent methodology for determining FC across all forms of infrastructure, to the extent possible. For example:</p> <p>i. Assessing whether infrastructure upgrades are already allowed for within the Council's Development Contributions Policy and only charging FC on upgrades not allowed for.</p> <p>ii. Only charging the proportion of FC needed to service the proposed development (e.g., accounting for cumulative effects on infrastructure, but not disproportionately charging FC to those who may be the first to trigger an infrastructure upgrade).</p> <p>B. Provide specific calculations, to the extent possible.</p> <p>C. Provide specific circumstances where FC will not be charged.</p> <p>D. Provide details as to who undertakes the assessment (e.g., per FC-S3.1.d) and the process for dispute resolution.</p>	<p>through a comprehensive DC policy under the Local Government Act 2002 (LGA) which sits outside of the District Plan. Development contributions are out of scope of legislation to be included in the District Plan. Concerned about how FC will be assessed and calculated and seeks that the District Plan provides greater transparency about costs and how these will be calculated and proportioned, and greater clarity in how FC will be implemented. As currently proposed, FC appear arbitrary and do not consider the variability of developments and their effects and therefore the FC are not considered to be reasonable or fair without provision for proper assessment of FC on a case-by-case basis. The s.32 analysis has not appropriately assessed the cost/benefit as the proposed provisions.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			E. By reference to an external document or resource, provide an 'online calculator' or similar tools to enable plan users to readily assess FC.	
S58.70	Development Contributions	Oppose	Delete DC - Development Contributions Background text to delete reference to development contributions. See submission for requested amendments.	DC-Development Contributions - Background - Consequential amendment. Oppose details related to DC as it complicates the chapter which Kāinga Ora seeks is directly related to FC, as provided for under the Act.
S58.71	DC-P1	Support and seek amendment	Amend DC-P1 to include references to 'those developing or subdividing', and 'based on the effects of the activity'. See submission for requested amendments.	DC-P1 - Seek amendments to clarify that contributions will be related to the effects of development and/or subdivision.
S58.72	DC-P2	Support and seek amendment	Amend DC-P2 to refer to 'those developing or subdividing', and 'to be responsible for the fair and reasonable cost', and to insert commentary that specifies that financial contributions are required 'where such costs are not otherwise addressed by any other funding source available to the Council. See the submission for specific requested amendments.	DC-P2 - Seek amendments to this policy to better reflect that FC should be fair and reasonable and only required where Council has not addressed investment through other funding sources. It is noted that Council through the LTP makes public investment in services that may consequentially benefit a development (including public services that run through a site) and therefore the servicing can be provided for by Council through allocated funding.
S58.73	DC-P3	Oppose and seek amendment	Delete DC-P3 and replace with a new policy as follows: ' <u>Require those developing or subdividing land to be responsible for the fair and reasonable cost of upgrading existing infrastructure or providing new infrastructure outside the land being subdivided, where existing infrastructure is not adequate to service</u>	DC-P3 - Amend to reflect that financial contributions are only required where Council does not have planned investment that would benefit the development. Amendments sought to clarify that the policy applies to infrastructure more generally, including transportation infrastructure. A replacement policy is sought.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<u>the development, and where such costs are not otherwise addressed by any other funding source available to the Council.'</u>	
S58.74	DC-P4	Oppose	Delete DC-P4.	DC-P4 - Oppose this policy as the public investment is driven by Development Contributions Policy and the LTP and are therefore not required as a FC, which are seeking to fill the gap between DC/LTP and enabled intensification.
S58.75	DC-P5	Oppose and seek amendment	Delete DC-P5 and replace it with the following: ' <u>Require those developing or subdividing land to make a fair and reasonable contribution, in money or land, to open space and/or reserve contribution, where such costs are not otherwise addressed by any other funding source available to the Council.'</u>	DC-P5 - Seek that amendments are made to better reflect the balance between private and public investment in open space and reserves. A replacement policy has been proposed.
S58.76	DC-P6	Oppose	Delete DC-P6.	DC-P6 - Seek the deletion of this policy as infrastructure can appropriately be captured under DCP3 subject to Kāinga Ora relief sought.
S58.77	DC-P7	Support and seek amendment	Amend DC-P7 consistent with the relief sought on the other FC chapter provisions. See submission for requested amendments.	DC-P7 - Seek amendments consistent with the rest of the submission.
S58.78	Development Contributions	Oppose	Delete Rule R2-A to R2-E. 2. Notwithstanding the relief sought in the Kāinga Ora submission, deletion of a rule requiring an equivalent value equal to 4% of the value of each new residential unit or allotment up to a maximum of \$10,000 per residential unit or allotment is sought.	All Proposed DC - Development Contributions rules. Seeks the deletion of all financial contribution rules as proposed, as the rules appear to describe cost responsibility for a number of development activities which is irrelevant to Financial Contributions. Particularly opposed to DC-R2A to the extent of requiring an equivalent value equal to 4% of the value of each new residential unit or allotment up to a maximum of \$10,000

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			(3). Seek a replacement rule for proposed rules R2-A to R2-E (see submission for the new rule requested by the submitter).	per residential unit or allotment. Further assessment is required to determine appropriate financial contributions on a case-by case basis. A new rule has been proposed that Kāinga Ora seeks to replace the proposed rules.
S58.79	Papakāinga	Support	Retain PK - Papakāinga - Background text as notified.	PK - Papakāinga - Background. Support the proposed text.
S58.80	PK-01	Support	Retain PK-O1 as notified.	PK-01 - Support the proposed objective.
S58.81	PK-02	Support	Retain PK-O2 as notified.	PK-02 - Support the proposed objective.
S58.82	PK-03	Support	Retain PK-O3 as notified.	PK-03 - Support the proposed objective.
S58.83	PK-04	Support	Retain PK-O4 as notified.	PK-04 - Support the proposed objective.
S58.84	PK-05	Support	Retain PK-O5 as notified.	PK-05 - Support the proposed objective.
S58.85	PK-06	Support	Retain PK-O6 as notified.	PK-06 - Support the proposed objective.
S58.86	PK-07	Support	Retain PK-O7 as notified.	PK-07 - Support the proposed objective.
S58.87	PK-P1	Support	Retain PK-P1 as notified.	PK-P1 - Support the proposed policy.
S58.88	PK-P2	Support	Retain PK-P2 as notified.	PK-P2 - Support the proposed policy.
S58.89	PK-P3	Support	Retain PK-P3 as notified.	PK-P3 - Support the proposed policy.
S58.90	PK-P4	Support and seek amendment	Amend PK-P4 to remove consideration of the effects on adjoining properties. See submission for requested amendments.	PK-P4 - The need to avoid, remedy or mitigate adverse effects on neighbouring properties is at odds with the overall intention of the policy, which relates to the maximum intensity and scale of papakāinga development.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.91	PK-P5	Support and seek amendment	Amend PK-P5 to include conservation activities in the list of non-residential activities.	PK-P5 - Request the inclusion of conservation activities in the policy.
S58.92	PK-P6	Support	Retain PK-P6 as notified.	PK-P6 - Support the proposed policy.
S58.93	PK-R1.1	Support	Retain PK-R1.1 as notified.	PK-R1.1 - Support the proposed rule.0
S58.94	PK-R1.2	Oppose and seek amendment	Amend PK-R1.2 to be a restricted discretionary activity rather than a discretionary activity. Delete the proposed public notification preclusion specific to standard (b) and replace with a general public notification preclusion for the entire rule. See submission for specific requested amendments.	PK-R1.2 - This requires compliance with the standards of the underlying zone, which across the plan are generally provided for as a restricted discretionary activity. It is considered that a restricted discretionary activity status is more appropriate for this activity as is consistent with the general planning framework of the Plan. Amendments sought to the notification preclusion as it is considered to be inconsistent with the general planning framework of the plan.
S58.95	GRZ	Support and seek amendment	Amend the GRZ-chapter to: 1. Rename the General Residential Zone (GRZ) as the Medium Density Residential Zone (MDZ); 2. Make consequential changes throughout the District Plan to give effect to the relief sought.	GRZ - General Residential Zone - Entire chapter. Consider that the General Residential Zone should be renamed as the Medium Density Residential Zone. This will encourage regional consistency with the names of zones in the Wellington region and also will better reflect the type of housing that the zone seeks to achieve.
S58.96	GRZ	Support and seek amendment	Amend GRZ Background text to: 1. Remove reference to the Medium and High Density Design Guides. 2. Kāinga Ora seeks the Design Guides and design guidelines are removed from within the District Plan and are treated as non-statutory tool, outside of the District Plan. 3. Where particular design outcomes are	GRZ-Background text. General support but oppose the reference to the design guides being incorporated as statutory elements of the District Plan. Kāinga Ora seeks deletion of this reference to these design guidelines.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>to be achieved, these should be specifically stated in matters of discretion or assessment.</p> <p>4. If the Council does not provide the relief sought, in deleting the Design Guides and design guidelines and references to such guidelines in the District Plan, Kāinga Ora seeks that the design guidelines are amended, simplified and written in a manner that is easy to follow. The outcomes sought in the guidelines should read as desired requirements with 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, it is considered that there is no flexibility and scope to create a design that fits with specific site characteristics and desired built form development.</p> <p>5. Kāinga Ora seeks the opportunity to review these guidelines if they are to remain a statutory document.</p>	
S58.97	GRZ-01	Support and seek amendment	Amend GRZ-01 to delete reference to 'character and amenity values developing and changing over time' and replacing with similar wording that includes reference to the 'planned urban build form of the zone'. See the submission for requested amendments.	GRZ-01 - Generally support the proposed amendments to the objective but seek amendments to make explicit reference to the anticipated change to the planned urban built form, appearance, and amenity within the zone, consistent with Policy 6 of the NPS-UD.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.98	GRZ-02	Support	Retain GRZ-02 as notified, with the exception that the specific provision reference is changed from GRZ to MRZ.	GRZ-02 - Support the RMA-mandated objective.
S58.99	GRZ-03	Support	Retain GRZ-03 as notified, with the exception that the specific provision reference is changed from GRZ to MRZ.	GRZ-03 - Support the RMA-mandated objective.
S58.100	GRZ-04	Support and seek amendment	Amend GRZ-04 to refer to no 'net' increase in the peak demand on stormwater management systems. See submission for requested amendment.	GRZ-04 - Generally support the intent of this objective but consider the requirement for there to be 'no increase' is unnecessarily strict and could be difficult to achieve. Kāinga Ora considers that there should be 'no net increase' in peak demand.
S58.101	GRZ-P1A	Support	Retain GRZ-P1A as notified, with the exception that the specific provision reference is changed from GRZ to MRZ.	GRZ-P1A - Support the RMA-mandated policy.
S58.102	GRZ-P1B	Support	Retain xGRZ-P1B as notified, with the exception that the specific provision reference is changed from GRZ to MRZ.	GRZ-P1B - Support the RMA-mandated policy.
S58.103	GRZ-P1C	Support	Retain GRZ-P1C as notified, with the exception that the specific provision reference is changed from GRZ to MRZ.	GRZ-P1C - Support the RMA-mandated policy.
S58.104	GRZ-P1D	Support	Retain GRZ-P1D as notified, with the exception that the specific provision reference is changed from GRZ to MRZ.	GRZ-P1D - Support the RMA-mandated policy.
S58.105	GRZ-PIE	Support	Retain GRZ-P1E as notified, with the exception that the specific provision reference is changed from GRZ to MRZ.	GRZ-P1E - Support the RMA-mandated policy.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.106	GRZ-P1	Support and seek amendment	Amend GRZ-P1 to make explicit reference be made to the anticipated change to the planned urban built form, appearance, and amenity within the zone, consistent with Policy 6 of the NPS-UD. See submission for requested amendments.	GRZ-P1 - Seek amendments to make explicit reference be made to the anticipated change to the planned urban built form, appearance, and amenity within the zone, consistent with Policy 6 of the NPS-UD.
S58.107	GRZ-P2	Support and seek amendment	Amend GRZ-P2 to make explicit reference be made to the anticipated change to the planned urban built form, appearance, and amenity within the zone, consistent with Policy 6 of the NPS-UD. See submission for requested amendments.	GRZ-P2 - Seek amendments to make explicit reference be made to the anticipated change to the planned urban built form, appearance, and amenity within the zone, consistent with Policy 6 of the NPS-UD.
S58.108	GRZ-P4	Support	Retain GRZ-P4 as notified, with the exception that the specific provision reference is changed from GRZ to MRZ.	Retain GRZ-P4 as notified, with the exception that the specific provision reference is changed from GRZ to MRZ.
S58.109	GRZ-P5	Support and seek amendment	Amend GRZ-P5 to delete reference to 'pleasant'. See submission for requested amendments.	Amend GRZ-P5 to delete reference to 'pleasant'. See submission for requested amendments.
S58.110	GRZ-P9	Support and seek amendment	Amend GRZ-P9 to make explicit reference be made to the anticipated change to the planned urban built form within the zone, consistent with Policy 6 of the NPS-UD. See submission for requested amendments.	GRZ-P9 - Seek amendments to make explicit reference be made to the anticipated change to the planned urban built form within the zone, consistent with Policy 6 of the NPS-UD.
S58.111	GRZ-R2	Support	Retain GRZ-R2 as notified, with the exception that the specific provision reference is changed from GRZ to MRZ.	GRZ-R2 - Support this rule and acknowledges it is taken from the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.112	GRZ-R3	Support	Retain GRZ-R3 as notified, with the exception that the specific provision reference is changed from GRZ to MRZ	GRZ-R3 - Support the proposed amendment to this rule.
S58.113	GRZ-R5A	Support	Retain GRZ-R5A as notified, with the exception that the specific provision reference is changed from GRZ to MRZ	GRZ-R5A - Support the proposed amendment to this rule.
S58.114	GRZ-S3	Support	Retain GRZ-S3 as notified, with the exception that the specific provision reference is changed from GRZ to MRZ	GRZ-S3 Building coverage - Support this standard and acknowledges it is taken from the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.
S58.115	GRZ-S4	Support	Retain GRZ-S4 as notified, with the exception that the specific provision reference is changed from GRZ to MRZ	GRZ-S4 - Setbacks. Support this standard and acknowledges it is taken from the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.
S58.116	GRZ-S5	Oppose and seek amendment	Delete MDRS standard GRZ-S5 and replace it with a standard that requires less outdoor living space (per unit). See the submission for the requested replacement standard.	GRZ-S5 - Outdoor living space (per unit). Seek amendments to provide for greater development by specifying a lower level of outdoor living space being required in identified cases to provide for greater design flexibility.
S58.117	GRZ-S7	Support and seek amendment	Amend MDRS standard GRZ-S7 to apply a building height of '18m where located in proximity to an identified Local Centre Zone, as identified on the Planning Maps as a Height Variation Control'. See the submission for requested amendments.	GRZ-S7 - Building height. Seek amendments to this standard to provide for greater density of development within walkable catchments of a Local Centre Zone. Kāinga Ora considers it appropriate to apply an additional height control within a 400m walkable catchment of a Local Centre Zones, as shown in the maps included in Appendix 4 of this submission.
S58.118	GRZ-S8	Support and seek amendment	Amend MDRS standard GRZ-S8 to add the following standard: ' <u>For sites identified as being subject to an increase in height control around the Local Centre Zones, a</u>	GRZ-S8 - Height in relation to boundary. - Seeks amendments to provide for greater development by specifying a more generous height in relation to boundary

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<u>60° recession plane measured from a point 6m vertically above ground level for the first 22m of the side boundary as measured from the road frontage, and 60° recession plane measured from a point 4m vertically above ground level where located further than 22m from the road and along all other boundaries.'</u>	control for buildings within a walkable catchment of Local Centre Zones or Town Centre Zones.
S58.119	GRZ-S13	Support	Retain GRZ-S13 as notified with the exception that the specific provision reference is changed from GRZ to MRZ.	GRZ-S13 - Number of residential units per site. Support this standard and acknowledges it is taken from the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.
S58.120	GRZ-S14	Support	Retain GRZ-S14 as notified with the exception that the specific provision reference is changed from GRZ to MRZ.	GRZ-S14 - Outlook space (per residential unit). Support this standard and acknowledges it is taken from the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.
S58.121	GRZ-S15	Support	Retain GRZ-S15 as notified with the exception that the specific provision reference is changed from GRZ to MRZ.	GRZ-S15 - Windows to street. Support this standard and acknowledges it is taken from the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.
S58.122	GRZ-S16	Support	Retain GRZ-S16 as notified with the exception that the specific provision reference is changed from GRZ to MRZ.	GRZ-S16 - Landscaped area. Support this standard and acknowledges it is taken from the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021.
S58.123	GRZ-R11	Support and seek amendment	Amend GRZ-R11 to (1). delete references to design guides from this rule and to remove design guides from within the District Plan and	GRZ-R11 - Oppose the inclusion of design guides in the plan, which act as de facto rules to be complied with. Oppose any policy or rule approach which would require development proposals to comply with such design guidelines in the District Plan. Design guides should sit outside of the district plan and be

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>are treated as non-statutory tool, outside of the District Plan.</p> <p>(2). Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment, such as and not limited to:</p> <ul style="list-style-type: none"> i. Provides an effective public private interface; ii. Provides a well-functioning site; iii. Provides high quality buildings; iv. Responds to the natural environment. <p>(3). 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> <p>(4). Kāinga Ora seek the opportunity to review these guidelines if they are to remain a statutory document.</p>	<p>treated as a non-statutory tool. If there is content of a Design Guide that Council wants in the Plan these should be relocated within a specific rule, matter of discretion or assessment criterion.</p>
S58.124	GRZ-R11	Support and seek amendment	Amend GRZ-R11 to include a non-notification clause as follows: ' <u>i. An application for resource consent under</u>	GRZ-R11 - Seek the introduction of a non-notification clause.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>this rule which does not comply with GRZ-S4 and GRZ-S8 is precluded from being publicly notified.</u></p> <p><u>ii. An application for resource consent under this rule which does not comply with GRZ-S5, GRZ-S9, GRZ-S14, GRZS15 or GRZ-S16 is precluded from being either publicly or limited notified.'</u></p>	
S58.125	GRZ-R11	Support and seek amendment	Amend GRZ-R11 to include an exclusion for non-compliance with GRZ-R13 - Number of residential units. See submission for requested amendment.	GRZ-R11 - Seek clarification that the rule does not apply to non-compliance with GRZ-S13 Number of residential units.
S58.126	GRZ-R12	Support and seek amendment	Amend GRZ-R12 as follows: Delete Matter of Discretion (1) of rule GRZ-R12 and replace it with references to the compatibility in scale, form and appearance with the planned urban built form, and the development of safe and attractive public realm and streetscape. See submission for requested amendments.	GRZ-R12 - Oppose the inclusion of design guides in the plan, which act as de facto rules to be complied with. Oppose any policy or rule approach which would require development proposals to comply with such design guidelines in the District Plan. Design guides should sit outside of the district plan and be treated as a non-statutory tool. If there is content of a Design Guide that Council wants in the Plan these should be relocated within a specific rule, matter of discretion or assessment criterion.
S58.127	GRZ-R12	Support and seek amendment	Amend GRZ-R12 to include a non-notification clause for public or limited notification is a proposal does not comply with GRZ-S5 - Outdoor living space (per residential unit), GRZ-S9 - Hydraulic neutrality, GRZ-S14 - Outlook space (per residential unit), GRZ-S15 (Windows to street), or GRZ-S16 (Landscaped area). See the submission for requested amendments.	GRZ-R12 - Seek the introduction of a clause to provide for preclusion from limited notification, noting that many of the permitted activity standards that may not be complied with generate effects that are internal to the development, and do not warrant public or limited notification.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.128	GRZ-R12	Support and seek amendment	Amend GRZ-R12 as follows: (1) Delete Matter of Discretion (2) and replace it with 'the development contributes to a safe and attractive public realm and streetscape'. (2) Amend Matter of Discretion (3) by adding 'extent and' to the matter. (3). Delete Matter of Discretion (4) and replace it with 'the extent and effects of the development to deliver quality on-site amenity and privacy that is appropriate for its scale'. (4) Delete Matter of Discretion (5) and replace it with a reference to the extent and effects on three waters capacity - see the submission for the requested amendments. See submission for requested amendments.	GRZ-R12 - Seek general amendments to the matters of discretion under this rule to provide greater clarity to the matters that may be considered.
S58.129	GRZ-R12A	Support and seek amendment	Delete matter of discretion (1) for GRZ-R12A that refers to the Medium and High Density Design Guide, and replace it with ' <u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood.</u> '	GRZ-R12A - Seek amendments to the rule to provide greater clarity. Opposes the inclusion of Design Guides in the Plan, which act as de facto rules to be complied with. Kāinga Ora opposes any policy or rule approach which would require development proposals to comply with such design guidelines in the District Plan. Kāinga Ora alternatively seeks and supports the Design Guides sitting outside the Plan as guidance regarding best practice design outcomes. The Design Guidelines should be treated as a non-statutory tool. If there is content of a Design Guide that Council wants in the Plan, Kāinga Ora seeks that these are relocated within a specific rule, matter of discretion or assessment criterion.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.130	GRZ-R12A	Support and seek amendment	Amend GRZ-R12A by deleting matters of discretion (2), (3), (4), and (5) and replace with matters of discretion addressing: (2) the extent and effects of development to deliver quality on-site amenity and privacy that is appropriate for its scale. (3) effects on three waters infrastructure. (4) contribution to safe and attractive public realm and streetscape. (5) on-site amenity and privacy that is appropriate for its scale. See the submission for specific requested amendments.	58.130 GRZ-R12A - Seek general amendments to the matters of discretion under this rule to provide greater clarity to the matters that may be considered.
S58.131	GRZ-R12B	Support and seek amendment	Delete matter of discretion (1) for GRZ-R12B that refers to the Medium and High Density Design Guide, and replace it with ' <u>The scale, form, and appearance of the development is compatible with the planned urban built form of the neighbourhood.</u> '	GRZ-R12B - Seek amendments to the rule to provide greater clarity. Opposes the inclusion of Design Guides in the Plan, which act as de facto rules to be complied with. Kāinga Ora opposes any policy or rule approach which would require development proposals to comply with such design guidelines in the District Plan. Kāinga Ora alternatively seeks and supports the Design Guides sitting outside the Plan as guidance regarding best practice design outcomes. The Design Guidelines should be treated as a non-statutory tool. If there is content of a Design Guide that Council wants in the Plan, Kāinga Ora seeks that these are relocated within a specific rule, matter of discretion or assessment criterion.
S58.132	GRZ-R12B	Support and seek amendment	Amend GRZ-R12B by adding the following to the restriction on notification clause: An application for resource consent under this rule which does not comply with GRZ-S5, GRZ-S9, GRZ-S14, GRZS15 or GRZ-S16 is precluded from being either publicly or limited notified.	GRZ-R12B - Seeks the introduction of a clause to provide for preclusion from limited notification, noting that many of the permitted activity standards that may not be complied with generate effects that are internal to the development, and do not warrant public or limited notification.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.133	GRZ-R12B	Support and seek amendment	Amend GRZ-R12B by: 1. Deleting matters of discretion (2), (3), (5), and (7) and replace with matters of discretion addressing: (2) the extent and effects of development to deliver quality on-site amenity and privacy that is appropriate for its scale. (3) effects on three waters infrastructure. (5) contribution to safe and attractive public realm and streetscape. (7) the extent and effects of development to deliver quality on-site amenity and privacy that is appropriate for its scale. 2. Amend matter of discretion (4) by adding 'extent and'. 3. Delete matter of discretion (6). See the submission for all requested amendments.	GRZ-R12B - seek general amendments to the matters of discretion under this rule to provide greater clarity to the matters that may be considered.
S58.134	GRZ-R22	Support	Retain GRZ-R22 as notified, with the exception that the specific provision reference is changed from GRZ to MRZ.	GRZ-R22 - Support the proposed amendment to the exclusion under this rule.
S58.135	GRZ-MC1	Support and seek amendment	Amend GRZ-MC1 to refer to 'planned built form' rather than 'planned built character'.	GRZ-MC1 - Request an amendment to the proposed wording to be consistent with the terminology introduced elsewhere in the IPI.
S58.136	GRZ-MC2	Support and seek amendment	Amend GRZ-MC2 to refer to 'planned urban built form and appearance' rather than 'planned urban built character'.	GRZ-MC2 - Request an amendment to the proposed wording to be consistent with the terminology introduced elsewhere in the IPI.
S58.137	Indigenous Biodiversity Precinct	Oppose	1. Delete the GRZ – Precinct 1 chapter and replace with an Indigenous Biodiversity Overlay, with a rule framework contained within the ECO chapter.	GRZ - Precinct 1 - Indigenous Biodiversity Precinct. Seek that the Indigenous Biodiversity Precinct is renamed and provided for as an overlay, as this is considered to be the appropriate method under the National Planning Standards, particularly as it is relevant across many different parts of the urban environment.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			2. Accept the changes sought in Appendix 3 of the submission. See submission for specific requested amendments.	It is considered inappropriate for the rules relating to indigenous biodiversity to be contained within the GRZ, as it is noted that indigenous biodiversity is of relevance city wide. Considers that the objectives, policies, and rules pertaining to the overlay should be contained in the Ecosystems and Indigenous Biodiversity chapter.
S58.138	HRZ Chapter	Oppose	Rewrite the HRZ chapter to remove the need for compliance with the permitted activity rules and standards that apply to the GRZ.	Entire HRZ chapter - Oppose the requirement of the rules within the chapter to comply with the permitted activity rules, standards, matters and information requirements that apply to the General Residential Zone, unless specifically provided for in a rule table in this chapter. The relevant rules, standards, matters of discretion and information requirements should be included in the HRZ chapter to provide certainty and reduce the confusion currently presented by the current rule. These standards should be written specifically for the HRZ. Requested HRZ rules and standards are included in Appendix 2 of the submission. See submission for details.
S58.139	HRZ Chapter	Oppose and seek amendment	Amend the HRZ chapter by inserting the HRZ rules and standards into this chapter, as detailed in Appendix 2 of the submission. See Appendix 2 of the submission for details.	HRZ chapter - seeks the introduction of a rule that permits residential activities within the HRZ. Requested wording of the rule is included in Appendix 2 of the submission. See submission for details.
S58.140	LCZ	Support and seek amendment	HRZ Background text - Remove item (viii) from the list, as the High Density Residential Zone should not apply within a walkable catchment of a Local Centre Zone.	HRZ Background text - Seek the removal of reference to the HRZ applying within a walkable catchment of the Local Centre Zone. As detailed elsewhere in the submission, Kāinga Ora considers it appropriate for the MRZ to apply adjacent to the LCZ, with an increased height control within a 400m walkable catchment of the LCZ.
S58.141	HRZ-01	Support	Retain HRZ-O1 as notified.	HRZ-O1 - Support the RMA mandated objective.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.142	HRZ-02	Support	Retain HRZ-02 as notified.	HRZ - O2 - Support the RMA mandated objective.
S58.143	HRZ-03	Support	Retain HRZ-03 as notified.	HRZ-03 - Hydraulic neutrality - Generally support the objective.
S58.144	HRZ-04	Support	Retain HRZ-04 as notified.	HRZ-04 - High Density Residential Zone - Generally support the objective
S58.145	HRZ-P1	Support	Retain HRZ-P1 as notified.	HRZ-P1 - Generally support the RMA mandated policy.
S58.146	HRZ-P2	Support	Retain HRZ-P2 as notified.	HRZ-P2 - Generally support the RMA mandated policy.
S58.147	HRZ-P3	Support	Retain HRZ-P3 as notified.	HRZ-P3 - Generally support the RMA mandated policy.
S58.148	HRZ-P4	Support	Retain HRZ-P4 as notified.	HRZ-P4 - Generally support the RMA mandated policy.
S58.149	HRZ-P5	Support and seek amendment	Amend HRZ-P5 to refer to 'planned urban built form, appearance, and amenity' rather than 'planned built character'. See submission for requested amendments.	HRZ-P5 - Seek amendments to make explicit reference be made to the anticipated change to the planned urban built form, appearance, and amenity within the zone, consistent with Policy 6 of the NPS-UD.
S58.150	HRZ-P6	Oppose	Amend HRZ-P6 to remove reference to the Medium and High Density Design Guides and replace with wording to articulate the standard of urban design that is being sought.	HRZ-P6 - Oppose design guides being incorporated as statutory elements of the District Plan. Seek changes so that the wording articulates the outcomes being sought.
S58.151	HRZ-P7	Support and seek amendment	Amend HRZ-P7 to enable the following building heights within the specified walkable catchments: a. CCZ and rapid transit stops i. 0m to 400m: 43m ii. 400m to 800m: 36m iii. 800 to 1200m: 22m	HRZ-P47 - Seek provision for increase building heights where they are located within a walkable catchment of the CCZ, TCZ and rapid transit stops. The height proposed in this policy is inconsistent with the building height proposed in HRZ-S2, which provides a maximum permitted building height of 20m. Kāinga Ora considers it necessary to enable additional building height, within a walkable catchment of the CCZ and TCZ, as

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			b. TCZ i. 0m to 800m: 22m	detailed in Appendix 3 of the submission. See Appendix 3 of the submission for details.
S58.152	HRZ	Oppose	Rewrite all HRZ rules to remove the need for reference to the GRZ chapter. The HRZ should contain all rules, standards, matters of discretion and information requirements necessary to determine the activity status of an activity occurring in the HRZ.	HRZ - All Rules. Oppose the structure of the rule framework where it is necessary to rely on both the GRZ and HRZ chapters to determine the activity status for an activity in the HRZ. As these are separate zones, the rule framework should provide for the HRZ as its own separate rule framework.
S58.153	HRZ-R2	Support and seek amendment	Amend HRZ-R2 to include the following non-notification clauses: Restriction on notification: iii. An application for resource consent under this rule which does not comply with HRZ-S3 is precluded from being publicly notified. iv. An application for resource consent under this rule which does not comply with HRZ-S5 is precluded from being either publicly or limited notified. 58.158 Insert a new restricted discretionary activity and discretionary activity rules into the HRZ chapter for commercial activities on ground floor of residential areas. Requested new rules include limits on GFA, hours of operation, and matters of discretion covering design, appearance and siting of the commercial activity, noise and illumination, and	HRZ-R2 - Buildings. Seek the introduction of a non-notification clause.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			signage. See the submission for specific requested amendments.	
S58.154	HRZ-R3	Oppose	Rewrite HRZ-R3 to remove the need for compliance with the controlled activity rules, standards, matters and information requirements that apply to the GRZ.	HRZ-R3 - Oppose the requirement of the rule to comply with the controlled activity rules, standards, matters and information requirements that apply to the General Residential Zone, unless specifically provided for in the rule table.
S58.155	HRZ-R5	Oppose	Rewrite HRZ-R5 to remove the need for compliance with the discretionary activity rules that apply to the GRZ.	HRZ-R5 - Oppose the requirement of the rule to comply with the discretionary activity rules that apply to the General Residential Zone, unless specifically provided for in the rule table.
S58.156	HRZ-R6	Oppose	Rewrite HRZ-R6 to remove the need for compliance with the non-complying activity rules that apply to the GRZ.	HRZ-R6 - Oppose the requirement of the rule to comply with the non-complying activity rules that apply to the General Residential Zone, unless specifically provided for in the rule table.
S58.157	HRZ-R7	Oppose	Rewrite HRZ-R7 to remove the need for compliance with the non-complying activity rules that apply to the GRZ.	HRZ-R7 - Oppose the requirement of the rule to comply with the prohibited activity rules that apply to the General Residential Zone, unless specifically provided for in the rule table.
S58.158	HRZ	Support and seek amendment	Insert a new restricted discretionary activity and discretionary activity rules into the HRZ chapter for commercial activities on ground floor of residential areas. Requested new rules include limits on GFA, hours of operation, and matters of discretion covering design, appearance and siting of the commercial activity, noise and illumination, and signage. See the submission for specific requested amendments.	Proposes (and supports) the introduction of a new rule - Seek the introduction of a new rule applying to commercial activities to enable commercial activities on ground floor to be specifically enabled via a Restricted Discretionary Activity consent pathway. 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 incorporated to ensure such activities do not detract from the underlying residential environment.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.159	HRZ-S2	Oppose and seek amendment	Amend HRZ-S2 to provide building heights of: a. 22m; or b. 43m within 0m to 400m of the City Centre Zone or rapid transit stops. c. 36m within 400m to 800m of the edge of the City Centre Zone or rapid transit stops. d. 29m within 0m to 800m of the edge of the Town Centre Zone	HRZ-S2 - Building height. Seeks a higher permitted building height in the HRZ to provide opportunity for greater density of housing, as is provided for in the objectives and policies of the HRZ. It is noted that policy HRZ-P7 seeks to enable residential building heights of up to 26m, but this is not provided for in the HRZ rules or standards.
S58.160	HRZ-S2	Oppose and seek amendment	Amend HRZ-S2 to: 1. Remove the Design Guides from within the District Plan and are treated as non-statutory tool, outside of the District Plan. 2. Delete all references to the Design Guides, including from the matters of discretion. 3. Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion. 4. If the Council does not provide the relief sought, in deleting the design guidelines and references to such guidelines in the District Plan, Kāinga Ora seeks that the design guidelines are amended, simplified and written in a manner that is easy to follow. The outcomes sought in the guidelines should read as desired requirements with sufficient flexibility to provide for a design that fits and works on site, rather than rules that a consent holder must follow	HRZ - S2 - Building height. Oppose the inclusion of Design Guides in the Plan, which act as de facto rules to be complied with. Kāinga Ora opposes any policy or rule approach which would require development proposals to comply with such design guidelines in the District Plan. The submitter seeks the Design Guides sit outside the Plan as non-statutory guidance. Seek that if there is content of a Design Guide that Council wants in the Plan, Kāinga Ora seeks that these are relocated within a specific rule, matter of discretion or assessment criterion.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			and adhere to. The submitter seeks the opportunity to review these guidelines if they are to remain a statutory document.	
S58.161	HRZ-S2	Oppose and seek amendment	Delete all HRZ-S2 Matters of Discretion and replace them with matters of discretion as follows: <u>a. Whether topographical or other site constraints make compliance with the standard impractical.</u> <u>b. Streetscape and visual amenity effects;</u> <u>c. Dominance, privacy and shading effects on adjoining sites.</u> See the submission for the specific amendments sought.	HRZ-S2 - Building Height - Seek general amendments to the matters of discretion under this standard to provide greater clarity to the matters that may be considered.
S58.162	HRZ-S3	Oppose and seek amendment	Amend HRZ-S3 as follows: All buildings and structures must not project beyond a: <u>a) 60° recession plane measured from a point 19m vertically above ground level along the first 22m of the side boundary as measured from the road frontage;</u> <u>b) 60° recession plane measured from a point 8m vertically above ground level along all other boundaries;</u> <u>c) Except no part of any building or structure may project beyond a:</u> <u>i. 60° recession plane measured from a point 4m vertically above ground level along any boundary that adjoins a site in the Medium Density Residential Zone.</u>	HRZ-S3 - Height in Relation to Boundary - Oppose and seek a more enabling height in relation to boundary control in the HRZ to provide opportunity for greater density of housing, as is provided for in the objectives and policies of the HRZ. Also seek amendments to the situations in which it is appropriate to further restrict the HIRB at the boundary to also include interface effects at the MRZ. Kāinga Ora seeks the amended wording and standard be utilised, which is similar to that used in the Wellington City PDP.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.163	HRZ-S3	Oppose and seek amendment	<p>Amend HRZ-S3 to:</p> <ol style="list-style-type: none"> 1. Remove the Design Guides from within the District Plan and are treated as non-statutory tool, outside of the District Plan. 2. Delete all references to the Design Guides, including from the matters of discretion. 3. Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion. 4. If the Council does not provide the relief sought, in deleting the design guidelines and references to such guidelines in the District Plan, Kāinga Ora seeks that the design guidelines are amended, simplified, and written in a manner that is easy to follow. The outcomes sought in the guidelines should read as desired requirements with sufficient flexibility to provide for a design that fits and works on site, rather than rules that a consent holder must follow and adhere to. The submitter seeks the opportunity to review these guidelines if they are to remain a statutory document. 	<p>HRZ-S3 - Height in Relation to Boundary - Opposes the inclusion of Design Guides in the Plan, which act as de facto rules to be complied with. Kāinga Ora opposes any policy or rule approach which would require development proposals to comply with such design guidelines in the District Plan. The submitter seeks the Design Guides sit outside the Plan as non-statutory guidance. Seek that if there is content of a Design Guide that Council wants in the Plan, Kāinga Ora seeks that these are relocated within a specific rule, matter of discretion or assessment criterion.</p>
S58.164	HRZ-S3	Oppose and seek amendment	<p>Delete all HRZ-S3 Matters of Discretion and replace them with the submitters requested matters of discretion as follows: <u>1. Dominance, privacy, and shading effects on adjoining sites.</u> See the submission for specific requested amendments.</p>	<p>HRZ-S3 - Height in Relation to Boundary - Seeks general amendments to the matters of discretion under this standard to provide greater clarity to the matters that may be considered.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.165	HRZ-S4	Support and seek amendment	<p>Amend HRZ-S4 to:</p> <ol style="list-style-type: none"> 1. Remove the Design Guides from within the District Plan and are treated as non-statutory tool, outside of the District Plan. 2. Delete all references to the Design Guides, including from the matters of discretion. 3. Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion. 4. If the Council does not provide the relief sought, in deleting the design guidelines and references to such guidelines in the District Plan, Kāinga Ora seeks that the design guidelines are amended, simplified, and written in a manner that is easy to follow. The outcomes sought in the guidelines should read as desired requirements with sufficient flexibility to provide for a design that fits and works on site, rather than rules that a consent holder must follow and adhere to. The submitter seeks the opportunity to review these guidelines if they are to remain a statutory document. 	<p>HRZ-S4 - Building coverage. Oppose the inclusion of Design Guides in the Plan, which act as de facto rules to be complied with. Kāinga Ora opposes any policy or rule approach which would require development proposals to comply with such design guidelines in the District Plan. The submitter seeks the Design Guides sit outside the Plan as non-statutory guidance. Seek that if there is content of a Design Guide that Council wants in the Plan, Kāinga Ora seeks that these are relocated within a specific rule, matter of discretion or assessment criterion.</p>
S58.166	HRZ-S4	Support and seek amendment	<p>Delete all HRZ-S4 Matter of Discretion and replace them with the submitters requested matters of discretion as follows:</p> <ol style="list-style-type: none"> a. <u>Streetscape and visual amenity effects;</u> and b. <u>Dominance effects on adjoining properties.</u> c. <u>Whether topographical or other site</u> 	<p>HRZ-S4 - Building coverage. Seek general amendments to the matters of discretion under this standard to provide greater clarity to the matters that may be considered.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			constraints make compliance with the standard impractical. See the submission for requested amendments.	
S58.167	HRZ-S5	Oppose and seek amendment	<p>Amend HRZ-S5 to:</p> <ol style="list-style-type: none"> 1. Remove the Design Guides from within the District Plan and are treated as non-statutory tool, outside of the District Plan. 2. Delete all references to the Design Guides, including from the matters of discretion. 3. Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion. 4. If the Council does not provide the relief sought, in deleting the design guidelines and references to such guidelines in the District Plan, Kāinga Ora seeks that the design guidelines are amended, simplified, and written in a manner that is easy to follow. The outcomes sought in the guidelines should read as desired requirements with sufficient flexibility to provide for a design that fits and works on site, rather than rules that a consent holder must follow and adhere to. The submitter seeks the opportunity to review these guidelines if they are to remain a statutory document. 	HRZ-S5 - Number of Residential Units Per Site. Oppose the inclusion of Design Guides in the Plan, which act as de facto rules to be complied with. Kāinga Ora opposes any policy or rule approach which would require development proposals to comply with such design guidelines in the District Plan. The submitter seeks the Design Guides sit outside the Plan as non-statutory guidance. Seek that if there is content of a Design Guide that Council wants in the Plan, Kāinga Ora seeks that these are relocated within a specific rule, matter of discretion or assessment criterion.
S58.168	HRZ-S5	Oppose and seek amendment	Delete all HRZ-S5 Matters of Discretion and replace with the submitter's requested matters of discretion as follows: <u>1. The scale, form, and</u>	HRZ-S5 - Number of Residential Units Per Site. Seeks amendments to the matters of discretion under this standard to provide greater clarity to the matters that may be considered.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>appearance of the development is compatible with the planned urban built form of the neighbourhood;</u></p> <p><u>2. The development contributes to a safe and attractive public realm and streetscape;</u></p> <p><u>3. 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></p> <p><u>4. The degree to which the development delivers quality on-site amenity and occupant privacy that is appropriate for its scale; and</u></p> <p><u>5. The extent and effect of noncompliance with any relevant standard as specified in the associated assessment criteria for the infringed standard.</u></p>	
S58.169	HRZ-S5	Oppose and seek amendment	<p>Amend HRZ-S5 to as follows:</p> <p><u>1. Provide for building heights of 22m, or the following building heights within the specified walkable catchment of the CCZ or TCZ:</u></p> <p><u>a. CCZ</u></p> <p><u>i. 0m to 400m: 43m</u></p> <p><u>ii. 400m to 800m: 36m</u></p> <p><u>b. TCZ</u></p> <p><u>i. 0m to 800m: 29m</u></p>	HRZ-S5 - Number of Residential Units Per Site - Note: The submission does not provide any specific reasons for the relief sought.
S58.170	HRZ-R8 or HRZ-R2	Support and seek amendment	Amend HRZ-R8 or HRZ-R2 so that there is only one Restricted Discretionary Activity rule assessing buildings exceeding the	HRZ-R8 - It is unclear how this rule relates to rule HRZ-R2, as both manage buildings exceeding the permitted maximum building height. HRZ-R2 assesses buildings exceeding permitted

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			maximum permitted building height. Amend the maximum building height to be 22m.	activity standard HRZ-S2 (building height), while HRZ-R8 assesses buildings exceeding 20m. Both rules appear to seek to assess the same noncompliance.
S58.171	HRZ-R8	Support and seek amendment	Amend HRZ-R8 to: 1. Remove the Design Guides from within the District Plan and are treated as non-statutory tool, outside of the District Plan. 2. Delete all references to the Design Guides, including from the matters of discretion. 3. Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion. 4. If the Council does not provide the relief sought, in deleting the design guidelines and references to such guidelines in the District Plan, Kāinga Ora seeks that the design guidelines are amended, simplified, and written in a manner that is easy to follow. The outcomes sought in the guidelines should read as desired requirements with sufficient flexibility to provide for a design that fits and works on site, rather than rules that a consent holder must follow and adhere to. The submitter seeks the opportunity to review these guidelines if they are to remain a statutory document.	HRZ-R8 - Oppose the inclusion of Design Guides in the Plan, which act as de facto rules to be complied with. Kāinga Ora opposes any policy or rule approach which would require development proposals to comply with such design guidelines in the District Plan. The submitter seeks the Design Guides sit outside the Plan as non-statutory guidance. Seek that if there is content of a Design Guide that Council wants in the Plan, Kāinga Ora seeks that these are relocated within a specific rule, matter of discretion or assessment criterion
S58.172	NCZ	Support and seek amendment	Retain NCZ in walkable catchment of higher-order Centre as notified.	NCZ - in walkable catchment of higher-order Centre. Generally support the use of and spatial extent of the NCZ, subject to consequential amendments as detailed in the maps that form

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				part of Appendix 4 of the submission. See submission to view Appendix 4.
S58.173	NCZ - Introduction	Support and seek amendment	Amend NCZ Introduction by deleting text the submitter considers too detailed and unnecessary. See the submission for requested amendments.	NCZ - Introduction. Generally support the introduction statement to the NCZ, but consider it to be too detailed and unnecessarily repeats the objectives and policies of the NCZ.
S58.174	NCZ-O1	Support	Retain NCZ-O1 as notified.	NCZ-O1 - Purpose of the Neighbourhood Centre Zone. Generally support the stated purpose of the zone.
S58.175	NCZ-O2	Support and seek amendment	Amend NCZ-O2 to refer to 'planned urban built form', and 'surrounding residential development. Delete reference to 'anticipated built character'. See the submission for requested relief.	NCZ-O2 - Request an amendment to the wording for consistency with other zones and policy 6 of the NPS-UD.
S58.176	NCZ-O3	Support	Retain NZC-O3 as notified.	NCZ-O3 - Generally support this objective.
S58.177	NCZ-P1	Support and seek amendment	Amend NCZ-P1 to refer to the 'planned urban built form'. Delete reference to 'character'. See the submission for requested amendments.	NCZ-P1 - Seek amendments to ensure activities are appropriate for the planned urban built form of the NCZ.
S58.178	NCZ-P2	Support	Retain NCZ-P2 as notified.	NCZ-P2 - Generally support this policy.
S58.179	NCZ-P3	Support and seek amendment	Amend NCZ-P3 to refer to 'planned urban built form'. Delete reference to 'anticipated character'. See the submission for specific requested amendments.	NCZ-P3 - Generally support this policy.
S58.180	NCZ-P4	Support	Retain NCZ-P4 as notified.	NCZ-P4 - Generally support this policy.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.181	NCZ-P5	Support and seek amendment	Amend NCZ-P5 to refer to 'urban' built form. See the submission for specific requested amendments.	NCZ-P5 - Request an amendment to the wording for consistency with other zones and policy 6 of the NPSUD.
S58.182	NCZ-P6	Support	Retain NCZ-P6 as notified.	NCZ-P6 - Generally support this policy.
S58.183	NCZ-P7	Support	Retain NCZ-P7 as notified.	NCZ-P7 - Generally support this policy.
S58.184	NCZ-P8	Support and seek amendment	Amend NCZ-P8 to add 'Require', delete 'will', and add 'to'. See the submission for the specific requested amendments.	NCZ-P8 - Seek amendments to have a more consistent wording of other policies in the plan and with a best-practice approach to policy wording.
S58.185	NCZ - Rules Advice Note	Support	Retain NCZ - Rules Advice Note as notified.	NCZ - Rules Advice Note - Generally support this rule section of the plan.
S58.186	NCZ-R1	Support and seek amendment	Amend NCZ-R1 to add additional standards to the preclusion to public notification and limited notification provisions by: 1. adding NCZ-S1 - Height, and deleting NZC-S4-Active Frontages from the public notification preclusion; and 2. Adding NCZ-S4 - Active Frontages, NCZ-S9 - Water Supply, Stormwater, and Wastewater, and NCZ-S10 - Hydraulic Neutrality to the public and limited notification preclusion provisions. See the submission for specific amendments to the notification preclusion provisions.	NCZ-R1 - Buildings and Structures, including additions and alterations. Consider that there are additional standards that should also be included in the preclusions to notification, as the effects generated are technical in nature and do not warrant public or limited notification.
S58.187	NCZ-R2	Support	Retain NCZ-R2 as notified.	NCZ-R2 - Minor Structures. Generally support this rule.
S58.188	NCZ-R3	Support	Retain NCZ-R3 as notified.	NCZ-R3 - Demolition. Generally support this rule.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.189	NCZ-R4	Support and seek amendment	Amend NCZ-R4 to include reference to Local Centre Zone and the Town Centre Zone. See the submission for specific requested amendments.	NCZ-R4 - Retail Activity. Considers the matter of discretion NCZ-R4(2)(a)(iii) should be amended to refer to all higher order centres, not just the CCZ to ensure that the NCZ also does not undermine the role and function of the LCZ and TCZ.
S58.190	NCZ-R5	Support	Retain NCZ-R5 as notified.	NCZ-R5 - Generally support this rule.
S58.191	NCZ-R6	Support	Retain NCZ-R6 as notified.	NCZ-R6 - Generally support this rule.
S58.192	NCZ-R7	Support	Retain NCZ-R7 as notified.	NCZ-R7 - Generally support this rule.
S58.193	NCZ-R8	Support	Retain NCZ-R8 as notified.	NCZ-R8 - Generally support this rule.
S58.194	NCZ-R9	Support	Retain NCZ-R9 as notified.	NCZ-R9 - Generally support this rule.
S58.195	NCZ-R10	Support	Retain NCZ-R10 as notified.	NCZ-R10 - Generally support this rule.
S58.196	NCZ-R11	Support	Retain NCZ-R11 as notified.	NCZ-R11 - Generally support this rule.
S58.197	NCZ-R12	Support	Retain NCZ-R12 as notified.	NCZ-R12 - Generally support this rule.
S58.198	NCZ-R13	Support	Retain NCZ-R13 as notified.	NCZ-R13 - Generally support this rule.
S58.199	NCZ-R14	Support	Retain NCZ-R14 as notified.	NCZ-R14 - Generally support this rule.
S58.200	NCZ-R15	Support	Retain NCZ-R15 as notified.	NCZ-R15 - Generally support this rule.
S58.201	NCZ-R16	Support	Retain NCZ-R16 as notified.	NCZ-R16 - Generally support this rule.
S58.202	NCZ-R17	Support	Retain NCZ-R17 as notified.	NCZ-R17 - Generally support this rule.
S58.203	NCZ-R18	Support	Retain NCZ-R18 as notified.	NCZ-R18 - Generally support this rule.
S58.204	NCZ-R19	Support	Retain NCZ-R19 as notified.	NCZ-R19 - Generally support this rule.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.205	NCZ-R20	Support	Retain NCZ-R20 as notified.	NCZ-R20 - Generally support this rule.
S58.206	NCZ-R21	Support	Retain NCZ-R21 as notified.	NCZ-R21 - Generally support this rule.
S58.207	NCZ-R22	Support	Retain NCZ-R22 as notified.	NCZ-R22 - Generally support this rule.
S58.208	NCZ-R23	Support	Retain NCZ-R23 as notified.	NCZ-R23 - Generally support this rule.
S58.209	NCZ-R24	Support	Retain NCZ-R24 as notified.	NCZ-R24 - Generally support this rule.
S58.210	NCZ-S1	Support	Retain NCZ-S1 as notified.	NCZ-S1 - Height. Generally support this standard.
S58.211	NCZ-S2	Support and seek amendment	Amend NCZ-S2 - Height in Relation to Boundary as follows: 1. Buildings must not project beyond a: a. 60° recession plane measured from a point 4 metres vertically above ground level along all boundaries, <u>where that boundary adjoins a site zoned Medium Density Residential Zone or Open Space and Recreation Zone,</u> as shown on the following diagram, <u>or</u> b. 60° recession plane measured from a point 8m vertically above ground level along all boundaries, <u>where that boundary adjoins a site zoned High Density Residential Zone.</u> The submitter also seeks that a diagram consistent with submission point (b) above is added to this standard. See the submission for requested relief.	NCZ-S2 - Height in Relation to Boundary - Seek additional flexibility be introduced for sites located within or adjacent to the HRZ.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.212	NZC-S3	Oppose	Delete NZC-S3.	NCZ-S3 - Setback. The standard is considered unnecessary and will unduly constrain built development opportunities on smaller NCZ sites.
S58.213	NZC-S4	Support	Retain NZC-S4 as notified.	NCZ-S4 - Active Frontages. Generally support this standard.
S58.214	NCZ-S5	Support and seek amendment	Amend NCZ-S5 to change standard 1(b) to refer to 'Pedestrian access to a residential unit does not', rather than 'They do not'. See the submission for specific requested relief.	NCZ-S5 - Location of Residential Units. Seeks an amendment to the exclusions for clarify.
S58.215	NCZ-S6	Support	Retain NCZ-S6 as notified.	NCZ-S6 - Noise and Ventilation. Generally support this standard.
S58.216	NCZ-S7	Support and seek amendment	Delete NCZ-S7 and replace it with the submitter's requested version that provides for reduced minimum outdoor living space. See the submission for the specific requested amendments.	NCZ-S7 - Outdoor Living Space. Support the intent of this standard and acknowledges it is taken from the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. Kāinga Ora seeks amendments to provide for greater development by specifying a lower level of outdoor living space being required in identified cases to provide for greater design flexibility.
S58.217	NCZ-S8	Support	Retain NCZ-S8 as notified.	NCZ-S8 - Screening and Landscaping of Service Areas, Outdoor Storage Areas, and Parking Areas. Generally support this standard.
S58.218	NCZ-S9	Support	Retain NCZ-S9 as notified.	NCZ-S9 - Water Supply, Stormwater and Wastewater. Generally support this standard.
S58.219	NCZ-S10	Support and seek amendment	Amend NCZ-S10 refer to the defined term and delete requirements specifying the performance requirements for hydraulic neutrality including the 10% and 1% Annual Exceedance Probability events. See the submission for requested relief.	NCZ-S10 - Hydraulic Neutrality. Seeks amendments as Hydraulic Neutrality is defined in the plan. Amendments are consistent with the relief sought on the definition for Hydraulic neutrality.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.220	NCZ-SSC-R1	Oppose	Delete NCZ-SSC-R1.	NCZ-SSC-R1 - Oppose this rule framework as it is considered that the NCZ standards provide the rule framework to manage development and effects should be based on their merits at time of application. (Note the submission states 'support', but this appears to be an error).
S58.221	NCZ-SSC-R2	Oppose	Delete NCZ-SSC-R2.	NCZ-SSC-R2 - Oppose this rule framework as it is considered that the NCZ standards provide the rule framework to manage development and effects should be based on their merits at time of application. (Note the submission states 'support', but this appears to be an error).
S58.222	NCZ-SSC-S1 to NCZ-SSC-S4	Oppose	Delete NCZ-SSC-S1 to NCZ-SSC-S4.	NCZ-SSC-S1 to NCZ-SSC-S4 – Site Specific Controls. Oppose this rule framework as it is considered that the NCZ standards provide the rule framework to manage development and effects should be based on their merits at time of application. (Note the submission states 'support', but this appears to be an error).
S58.223	LCZ	Support and seek amendment	Amend the spatial extent of the LCZ as shown in Appendix 4 of the submission including the spatial extent of Wallaceville LCZ and Trentham North LCZ. See Appendix 4 of the submission for specific requested mapping amendments. If the relief sought in this submission point and Appendix 4 are not granted, the following relief is sought: a. Wallaceville LCZ – amendments consistent with the height variation control sought for the HRZ within a walkable catchment of the CCZ, including 36m height variation on the east side of Ward St.	LCZ - Local Centres Zone - spatial extent. Request amendments to the areas mapped as LCZ to provide opportunity for greater density development and servicing of the surrounding residential environment.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.224	LCZ	Support and seek amendment	<p>Amend the spatial extent of the LCZ as shown in Appendix 4 of the submission including removal of the Blue Mountain Campus as a LCZ and changed to MUZ. See Appendix 4 of the submission for specific requested mapping amendments. (1). If the relief sought in this submission point and Appendix 4 are not granted, the following relief is sought:</p> <ul style="list-style-type: none"> a. Blue Mountain Campus – amendments consistent with the rest of the submission on the LCZ. (2). Where a LCZ falls within the walkable catchment of a higher order centre, amend heights as consistent with the heights enabled in the surrounding residential zone and as consistent with height variations shown and sought in Appendix 4 of the submission and this submission point, including applying: <ul style="list-style-type: none"> a. Height variation control of 36m to spatial expansion of Wallaceville LCZ on East side of Ward St (walkable catchment of CCZ). b. Height variation control of 36m to LCZ on Fergusson Dr at Whakatiki St. (walkable catchment of CCZ) c. Height Variation control of 29m to Silverstream LCZ on Fergusson Dr at Stream Grove (walkable catchment of TCZ). d. Height variation control of 29m to Trentham LCZ on Fergusson Dr at Islington 	<p>LCZ-Local Centres Zones - spatial extent. Oppose inclusion of Blue Mountain Campus as LCZ as it does not appear to meet the requirements for a LCZ in terms of role and location with respect to the surrounding residential environment. The Blue Mountain Campus would more appropriately be zoned as Mixed Urban Zone (MUZ) site.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			St (walkable catchment of proposed TCZ). (3). Consequential amendments may be required to give effect to the changes sought. See the submission and its Appendix 4 for further details.	
S58.225	LCZ - Introduction	Support	Retain LCZ - Local Centres Zone - Introduction text as notified.	LCZ - Local Centres Zone - Introduction text. Generally support the introduction statement.
S58.226	LCZ-O1	Support	Retain LCZ-O1 as notified.	LCZ-O1 - Purpose of the Local Centre Zone. Generally support this objective.
S58.227	LCZ-O2	Support and seek amendment	Amend LCZ-O2 to replace reference to 'character and amenity values' with 'planned urban built form'. See the submission for specific requested amendments.	LCZ-O2 - Character and Amenity Values of the Local Centre Zone. Requests an amendment to the wording for consistency with other zones and policy 6 of the NPS-UD.
S58.228	LCZ-O3	Support and seek amendment	Amend LCZ-O3 by deleting reference to 'anticipated character' and inserting 'urban' built form. See the submission for specific requested amendments.	LCZ-O3 - Managing Effects at the Zone Interface. Request an amendment to the wording for consistency with other zones and policy 6 of the NPS-UD.
S58.229	LCZ-O4	Support	Retain LCZ-O4 as notified.	LCZ-O4 - Hydraulic Neutrality. Generally support this objective.
S58.230	LCZ-P1	Support	Retain LCZ-P1 as notified.	LCZ-P1 - Appropriate Activities. Generally support this policy.
S58.231	LCZ-P2	Support	Retain LCZ-P2 as notified.	LCZ-P2 - Residential Activity. Generally support this policy.
S58.232	LCZ-P3	Support	Retain LCZ-P3 as notified.	LCZ-P3 - Other Activities. Generally support this policy.
S58.233	LCZ-P4	Support	Retain LCZ-P4 as notified.	LCZ-P4 - Inappropriate Activities. Generally support this policy.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.234	LCZ-P5	Support and seek amendment	Amend LCZ-P5 by inserting 'urban' into point 1. See the submission for specific requested amendment.	LCZ-P5 - Built Development. Request an amendment to the wording for consistency with other zones and policy 6 of the NPSUD.
S58.235	LCZ-P6	Support	Retain LCZ-P6 as notified.	LCZ-P6 - Public Space Interface and Active Street Frontages. Generally support this policy.
S58.236	LCZ-P7	Support	Retain LCZ-P7 as notified.	LCZ-7 - Interface with Residential Zones and Open Space and Recreation Zones. Generally support this policy
S58.237	LCZ-P8	Support	Retain LCZ-P8 as notified.	LCZ-P8 - Hydraulic Neutrality. Generally support this policy
S58.238	LCZ rule table	Support	Retain LCZ rule table as notified.	LCZ - Rules. Generally support the rule table.
S58.239	LCZ-R1	Support and seek amendment	Amend the notification preclusion of rule LCZ-R1 to add LCZ-S1 (Height) and delete LCZ-S4 (Active Frontage) from the public notification preclusion clause, and add LCZ-S4 (Active Frontage), LCZ-S9 (Water Supply, Stormwater and Wastewater), and LCZ-S10 (Hydraulic Neutrality) to the public notification and limited notification preclusion clause.	LCZ-R1 - Generally supports this rule framework and associated preclusions to notification but considers that there are additional standards that should also be included in the preclusions to notification, as the effects generated are technical in nature and do not warrant public or limited notification.
S58.240	LCZ-R2	Support	Retain LCZ-R2 as notified.	LCZ-R2 - Minor structure. Generally support this rule.
S58.241	LCZ-R3	Support	Retain LCZ-R3 as notified.	LCZ-R3 - Demolition. Generally support this rule.
S58.242	LCZ-R4	Support	Retain LCZ-R4 as notified.	LCZ-R4 - Retail activity. Generally support this rule.
S58.243	LCZ-R5	Support	Retain LCZ-R5 as notified.	LCZ-R5 - Commercial Service Activity. Generally support this rule.
S58.244	LCZ-R6	Support	Retain LCZ-R6 as notified.	LCZ-R6 - Food and Beverage Activity. Generally support this rule.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.245	LCZ-R7	Support	Retain LCZ-R7 as notified.	LCZ-R7 - Community Facility. Generally support this rule.
S58.246	LCZ-R8	Support	Retain LCZ-R8 as notified.	LCZ-R8 - Healthcare Activity. Generally support this rule.
S58.247	LCZ-R9	Support	Retain LCZ-R9 as notified.	LCZ-R9 - Education Facility. Generally support this rule.
S58.248	LCZ-R10	Support	Retain LCZ-R10 as notified.	LCZ-R10 - Office Activity. Generally support this rule.
S58.249	LCZ-R11	Support	Retain LCZ-R11 as notified.	LCZ-R11 - Visitor Accommodation. Generally support this rule.
S58.250	LCZ-R12	Support and seek amendment	Amend LCZ-R12 to: (1) Delete standard 1.(a) that limits the number of residential units to 6 per site. (2) Delete Standard 2.(a) that specifies the matters of discretion that apply where compliance with standard 1.(a) is not achieved. 3. Make consequential amendments. See the submission for specific requested amendments.	LCZ-R12 - Residential Activity. Support the preclusion to both limited and public notification in this rule framework, Kāinga Ora does not consider it necessary for a limit on the number of residential units in the zone and therefore seeks amendment to remove a maximum threshold on the number of permitted residential units.
S58.251	LCZ-R13	Support	Retain LCZ-R13 as notified.	LCZ-R13 - Supermarket. Generally support this rule.
S58.252	LCZ-R14	Support	Retain LCZ-R14 as notified.	LCZ-R14 - Emergency Service Facility. Generally support this rule.
S58.253	LCZ-R15	Support	Retain LCZ-R15 as notified.	LCZ-R15 - Entertainment Facility. Generally support this rule.
S58.254	LCZ-R16	Support	Retain LCZ-R16 as notified.	LCZ-R16 - Sport and Active Recreation. Generally support this rule.
S58.255	LCZ-R17	Support	Retain LCZ-R17 as notified.	LCZ-R17 - Large Format Retail Activity, excluding Supermarkets. Generally support this rule.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.256	LCZ-R18	Support	Retain LCZ-R18 as notified.	LCZ-R18 - Drive-through Activity. Generally support this rule.
S58.257	LCZ-R19	Support	Retain LCZ-R19 as notified.	LCZ-R19 - Retirement Village. Generally support this rule.
S58.258	LCZ-R20	Support	Retain LCZ-R20 as notified.	LCZ-R20 - Any activity not otherwise listed as permitted, restricted discretionary, discretionary or non-complying. Generally support this rule.
S58.259	LCZ-R21	Support	Retain LCZ-R21 as notified.	LCZ-R21 - Industrial Activity. Generally support this rule.
S58.260	LCZ-R22	Support	Retain LCZ-R22 as notified.	LCZ-R22 - Yard Sale Activity / Trade Supplier. Generally support this rule.
S58.261	LCZ-R23	Support	Retain LCZ-R23 as notified.	LCZ-R23 - Motorised Recreation. Generally support this rule.
S58.262	LCZ-R24	Support	Retain LCZ-R24 as notified.	LCZ-R24 - Rural Industry. Generally support this rule.
S58.263	LCZ-R25	Support	Retain LCZ-R25 as notified.	LCZ-R25 - Primary Production. Generally support this rule.
S58.264	LCZ-S1	Support	Retain LCZ-S1 as notified.	LCZ-S1 - Height. Generally support this standard.
S58.265	LCZ-S2	Support and seek amendment	Amend LCZ-S2 by: (1) deleting the reference to the Open Space and Recreation Zone. (2). Amend the recession plane standard 1.(a) by limiting its applicability to where the boundary adjoins a site zoned Medium Density Residential Zone. (3). Insert a new clause (b) to standard 1. as follows: <u>b. 60° recession plane measured from a point 8m vertically above ground level along all boundaries, where that boundary adjoins a site zoned High Density Residential Zone.</u> The submission seeks that a diagram consistent with this	LCZ-S2 - Height in Relation to Boundary. Seek additional flexibility be introduced for sites located within or adjacent to the HRZ.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			requested new clause be added to the standard - no diagram is provided by the submitter. See the submission for specific requested amendments.	
S58.266	LCZ-S3	Support	Retain LCZ-S3 as notified.	LCZ-S3 - Setback. Generally support this standard.
S58.267	LCZ-S4	Support	Retain LCZ-S4 as notified.	LCZ-S4 - Active Frontages. Generally support this standard.
S58.268	LCZ-S5	Support and seek amendment	Amend LCZ-S5 - Location of Residential Units, by adding the following to the standard: Along active frontages identified on the planning maps all residential units must be located above ground floor level, <u>except that residential units may be located on the ground floor where pedestrian access to a residential unit does not interrupt or prevent an active frontage as required by LCZ-S4.</u>	LCZ-S5 - Location of Residential Units. Seek provision for residential units to be provided at the rear of sites, consistent with what is proposed under NCZ-S5 in the Neighbourhood Centre Zone.
S58.269	LCZ-S6	Support	Retain LCZ-S6 as notified.	LCZ-S6 - Noise and Ventilation. Generally support this standard.
S58.270	LCZ-S7	Support and seek amendment	Delete LCZ-S7 and replace it with the submitter's requested wording that provides for smaller outdoor living spaces. See the submission for the specific requested amendments.	LCZ-S7 - Outdoor Living Space. Acknowledges it is taken from the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. Kāinga Ora seeks amendments to provide for greater development by specifying a lower level of outdoor living space being required in identified cases to provide for greater design flexibility.
S58.271	LCZ-S8	Support	Retain LCZ-S8 as notified.	LCZ-S8 - Screening and Landscaping of Service Areas, Outdoor Storage Areas and Parking Areas. Generally support this standard.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.272	LCZ-S9	Support	Retain LCZ-S9 as notified.	LCZ-S9 - Water Supply, Stormwater and Wastewater. Generally support this standard.
S58.273	LCZ-S10	Support and seek amendment	Amend LCZ-S10 to insert 'hydraulic neutrality' and delete the hydraulic neutrality performance requirements as follows: New buildings and development must be designed to achieve <u>Hydraulic Neutrality</u> . ensure that the stormwater runoff from all new impermeable surfaces will be disposed of or stored on-site and released at a rate that does not exceed the peak stormwater runoff when compared to the pre-development situation for the 10% and 1% rainfall Annual Exceedance Probability event.	LCZ-S10 - Hydraulic Neutrality. Seek amendments as Hydraulic Neutrality is defined in the plan. Amendments are consistent with the relief sought on the definition for Hydraulic neutrality.
S58.274	MUZ	Support and seek amendment	Amend the spatial extent and Application of the MUZ on the planning maps as shown in Appendix 4 of the submission. See the submission for details.	MUZ - Spatial Extent and Application of Zone. Generally support the use of the MUZ but does not agree with spot rezoning to MUZ, particularly on sites in proximity to the CCZ.
S58.275	MUZ	Support and seek amendment	Rezone Blue Mountain Campus to Mixed Use Zone, as shown in Appendix 4 pf the submission. See the submission for details.	MUZ - Spatial Extent and Application of Zone. Generally support the use of the MUZ but does not agree with spot rezoning to MUZ, particularly on sites in proximity to the CCZ.
S58.276	MUZ	Support	Retain MUZ - Introduction as notified.	MUZ - Introduction. Generally support the introduction statement.
S58.277	MUZ-O1	Support	Retain MUZ-O1 as notified.	MUZ-O1 Purpose of the Mixed Use Zone. Generally support the objective.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.278	MUZ-O2	Support	Retain MUZ-O2 as notified.	MUZ-O2 - Character and Amenity Values of the Mixed Use Zone Generally support the objective.
S58.279	MUZ-O3	Support	Retain MUZ-O3 as notified.	MUZ-O3 - Managing Effects at the Zone Interface. Generally support the objective.
S58.280	MUZ-O4	Support	Retain MUZ-O4 - Hydraulic neutrality as notified.	MUZ-O4 - Hydraulic neutrality. Generally support this objective.
S58.281	MUZ-P1	Support	Retain MUZ-P1 - Appropriate Activities as notified.	MUZ-P1 - Appropriate Activities. Generally support this policy.
S58.282	MUZ-P2	Support	Retain MUZ-P2 - Residential Activities as notified.	MUZ-P2 - Residential Activities. Generally support this policy.
S58.283	MUZ-P3	Support	Retain MUZ-P3 - Other Activities as notified.	MUZ-P3 - Other Activities. Generally support this policy.
S58.284	MUZ-P4	Support	Retain MUZ-P4 - Inappropriate Activities as notified.	MUZ-P4 - Inappropriate Activities. Generally support this policy.
S58.285	MUZ-P5	Support and seek amendment	Amend MUZ-P5 to insert reference to planned 'urban' built form. See submission for requested amendment.	MUZ-P5 - Built Development. Requests an amendment to the wording for consistency with other zones and policy 6 of the NPSUD.
S58.286	MUZ-P6	Support	Retain MUZ-P6 as notified.	MUZ-P6 - Public Space Interface. Generally support this policy.
S58.287	MUZ-P7	Support	Retain MUZ-P7 as notified.	MUZ-P7 - Interface with Residential and Open Space and Recreation Zones. Generally support this policy.
S58.288	MUZ-P8	Support	Retain MUZ-P8 as notified.	MUZ-P8 - Hydraulic Neutrality. Generally support this policy.
S58.289	MUZ - rule table	Support	Retain MUZ - rule table as notified.	MUZ - Rules. Generally support the rules table.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.290	MUZ-R1	Support and seek amendment	Amend MUZ-R1 to add MUZ-S1 - Height to the preclusion from public notification clause, and add MUZ-S7 - Water Supply, Stormwater, and Wastewater, and MUZ-S8 - Hydraulic Neutrality to the preclusion from public or limited notification clause. See the submission for requested amendments.	MUZ-R1 - Buildings and structures, including additions and alterations. Consider that there are additional standards that should also be included in the preclusions to notification, as the effects generated are technical in nature and do not warrant public or limited notification.
S58.291	MUZ-R3	Support	Retain MUZ-R3 as notified	UZ-R2 - Minor Structures. Generally support this rule.
S58.292	MUZ-R3	Support	Retain MUZ-R3 as notified	MUZ-R3 - Demolition. Generally support this rule.
S58.293	MUZ-R4	Support	Retain MUZ-R4 as notified.	MUZ-R4 - Retail Activity and Large Format Retailing. Generally support this rule.
S58.294	MUZ-R5	Support	Retain MUZ-R5 as notified.	MUZ-R5 - Commercial Service Activity. Generally support this rule.
S58.295	MUZ-R6	Support	Retain MUZ-R6 as notified.	MUZ-R6 - Food and Beverage Activity. Generally support this rule.
S58.296	MUZ-R7	Support	Retain MUZ-R7 as notified.	MUZ-R7 - Community Facility. Generally support this rule.
S58.297	MUZ-R8	Support	Retain MUZ-R8 as notified.	MUZ-R8 - Healthcare Activity. Generally support this rule.
S58.298	MUZ-R9	Support	Retain MUZ-R9 as notified.	MUZ-R9 - Educational Facility. Generally support this rule.
S58.299	MUZ-R10	Support	Retain MUZ-R10 as notified.	MUZ-R10 - Entertainment Facility. Generally support this rule.
S58.300	MUZ-R11	Support	Retain MUZ-R11 as notified.	MUZ-R11 - Sport and Active Recreation.
S58.301	MUZ-R12	Support	Retain MUZ-R12 as notified.	MUZ-R12 - Office activity. Generally support this rule.
S58.302	MUZ-R14	Support	Retain MUZ-R14 as notified.	MUZ-R14 - Drive-through Activity. Generally support this rule.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.303	MUZ-R15	Support	Retain MUZ-R15 as notified.	MUZ-R15 - Visitor Accommodation. Generally support this rule.
S58.304	MUZ-R16	Support and seek amendment	Amend MUZ-R16 to: (A) delete Standard 1.a. to remove the permitted activity limit of 6 residential units per site. (B) Delete Standard 2.a. and b. to remove the matters of discretion that relate to the residential use. (C) add 'or limited' notification to the notification preclusion clause. (D) Make consequential referencing amendments. See the submission for requested amendments.	MUZ-R16 - Residential Activities. supports the preclusion to public notification in this rule framework, Kāinga Ora does not consider it necessary for a limit on the number of residential units in the zone and therefore seeks amendment to remove a maximum threshold on the number of permitted residential units. Kāinga Ora also consider that it is appropriate for this rule to provide for a preclusion to limited notification, consistent with the same rules in the NCZ and LCZ.
S58.305	MUZ-R17	Support	Retain MUZ-R17 as notified.	MUZ-R17 - Retirement Village. Generally support this rule.
S58.306	MUZ-R18	Support	Retain MUZ-R18 as notified.	MUZ-R18 - Light Industrial Activities. Generally support this rule.
S58.307	MUZ-R19	Support	Retain MUZ-R19 as notified.	MUZ-R19 - Emergency Service Facility. Generally support this rule.
S58.308	MUZ-R20	Support	Retain MUZ-R20 as notified.	MUZ-R20 - Warehouses. Generally support this rule.
S58.309	MUZ-R21	Support	Retain MUZ-R21 as notified.	MUZ-R21 - Yard Based Activity / Trade Supplier. Generally support this rule.
S58.310	MUZ-R22	Support	Retain MUZ-R22 as notified.	MUZ-R22 - Motorised Recreation. Generally support this rule.
S58.311	MUZ-R23	Support	Retain MUZ-R23 as notified.	MUZ-R23 -Any activity not otherwise listed as permitted, restricted discretionary, discretionary or non-complying. Generally support this rule.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.312	MUZ-R24	Support	Retain MUZ-R24 as notified.	MUZ-R24 - Industrial Activity, excluding Light Industrial Activities and Warehouses. Generally support this rule.
S58.313	MUZ-R25	Support	Retain MUZ-R25 as notified.	MUZ-R25 - Rural Industry. Generally support this rule.
S58.314	MUZ-R26	Support	Retain MUZ-R26 as notified.	MUZ-R26 - Primary Production. Generally support this rule.
S58.315	MUZ-S1	Support	Retain MUZ-S1 as notified.	MUZ-S1 - Height. Generally support this standard.
S58.316	MUZ-S2	Support	Retain MUZ-S2 as notified.	MUZ-S2 -Height in Relation to Boundary. Generally support this standard.
S58.317	MUZ-S3	Support	Retain MUZ-S3 as notified.	MUZ-S3 - Setback. Generally support this standard.
S58.318	MUZ-S4	Support	Retain MUZ-S4 as notified.	MUZ-S4 - Noise and Ventilation. Generally support this standard.
S58.319	MUZ-S5	Support and seek amendment	Delete MUZ-S5 and replace it with the submitters requested outdoor living space standards, which generally provides for smaller outdoor living areas. See the submission for specific requested amendments.	MUZ-S5 – Outdoor Living Space. Support the intent of this standard and acknowledges it is taken from the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. Seek amendments to provide for greater development by specifying a lower level of outdoor living space being required in identified cases to provide for greater design flexibility.
S58.320	MUZ-S6	Support	Retain MUZ-S6 as notified.	MUZ-S6 - Screening and Landscaping of Service Areas, Outdoor Storage Areas and Parking Areas. Generally support this standard.
S58.321	MUZ-S7	Support	Retain MUZ-S7 as notified.	MUZ-S7 - Water Supply, Stormwater and Wastewater. Generally support this standard.
S58.322	MUZ-S8	Support	Retain MUZ-S8 as notified.	MUZ-S8 - Hydraulic Neutrality. Generally support this standard.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.323	TCZ	Support and seek amendment	Amend the TCZ spatial extent as shown in Appendix 4 to the submission. If the relief sought is not granted, the following relief is sought: a. Silverstream TCZ – height variation control of 29m to HRZ. Consequential amendments may be required to give effect to the changes sought in this submission. See the submission and its Appendix 4 for details.	TCZ- Spatial Extent and Application of Zone. Consider that the spatial extent of the Silverstream TCZ does not provide for the level of intensification required to serve the surrounding residential environment. Seek amendments to the areas mapped as TCZ to provide opportunity for greater density development and servicing of the surrounding residential environment.
S58.324	Trentham LCZ	Support and seek amendment	Amend Trentham LCZ to become TCZ, as shown in Appendix 4 of the submission. If the relief sought is not granted, the following relief is sought: a. Trentham as a TCZ – no variation to outcomes sought consistent with rest of submission b. Spatial Extent of Trentham TCZ – height variation of 29m to HRZ. Consequential amendments may be required to give effect to the changes sought in this submission. See the submission and its Appendix 4 for details.	TCZ - Spatial Extent and Application of Zone. Seeks that the proposed Trentham LCZ is expanded spatially and zoned as a Town Centre Zone. Consider that the Trentham centre is suitable to provide for a wider spatial extent of residential areas to enable people to access a range of larger range of commercial amenity and community services and provide for the future role and function of the centre within the context of anticipated residential development.
S58.325	TCZ	Support and seek amendment	Amend the TCZ - Introduction to: (1) delete references to Silverstream Centre. (2) Add reference to Trentham as a town centre zone in the Zone provisions.	TCZ - Introduction. Seek removal of specific mention of Silverstream as the submitter considers that other areas should be zoned TCZ, as shown in the planning maps in Appendix 4 of the submission.
S58.326	TCZ-O1	Support	Retain TCZ-O1 as notified.	TCZ-O1 - Purpose of the Town Centre Zone. Generally support this objective.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.327	TCZ-O2	Support	Retain TCZ-O2 as notified.	TCZ-O2 - Character and Amenity Values of the Town Centre Zone. Generally support this objective.
S58.328	TCZ-O3	Support	Retain TCZ-O3 as notified.	TCZ-O3 -Managing Effects at the Zone Interface. Generally support this objective
S58.329	TCZ-O4	Support	Retain TCZ-O4 as notified.	TCZ-O4 - Hydraulic Neutrality. Generally support this objective.
S58.330	TCZ-P1	Support	Retain TCZ-P1 as notified.	TCZ-P1 - Appropriate Activities. Generally support this policy.
S58.331	TCZ-P2	Support	Retain TCZ-P2 as notified.	TCZ-P2 - Residential Activity. Generally support this policy.
S58.332	TCZ-P3	Support	Retain TCZ-P3 as notified.	TCZ-P3 - Other activities. Generally support this policy.
S58.333	TCZ-P4	Support	Retain TCZ-P4 as notified.	TCZ-P4 - Inappropriate Activities. Generally support this policy.
S58.334	TCZ-P5	Support	Retain TCZ-P5 as notified.	TCZ-P5 - Built Development. Generally support this policy.
S58.335	TCZ-P6	Support	Retain TCZ-P6 as notified.	TCZ-P6 - Public Space Interface and Active Street Frontages. Generally support this policy.
S58.336	TCZ-P7	Support	Retain TCZ-P7 as notified.	TCZ-P7 - Interface with Residential Zones and Open Space and Recreation Zones. Generally support this policy.
S58.337	TCZ-P8	Support	Retain TCZ-P8 as notified.	TCZ-P8 - Hydraulic Neutrality. Generally support this policy.
S58.338	TCZ rule table	Support	Retain TCZ rule table as notified.	TCZ - Rules. Generally support the rule table.
S58.339	TCZ-R1	Support and seek amendment	Amend TCZ-R1 to: (1) TCZ-S1 - Height to the public notification preclusion clause. (2) Amend the notification preclusion clause so TCZ-S4 - Active Frontages is	TCZ-R1 - Buildings and structures, including additions and alterations. Consider that there are additional standards that should also be included in the preclusions to notification, as the effects generated are technical in nature and do not warrant public or limited notification.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			precluded from limited and public notification. (3) Add TCZ-S9 - Water Supply, Stormwater and Wastewater), and TCZ-S10 - Hydraulic Neutrality to the public and limited notification preclusion clause.	
S58.340	TCZ-R2	Support	Retain TCZ-R2 as notified.	TCZ-R2 - Minor Structures. Generally support this rule.
S58.341	TCZ-R3	Support	Retain TCZ-R3 as notified.	TCZ-R3 – Demolition. Generally support this rule.
S58.342	TCZ-R4	Support	Retain TCZ-R4 as notified.	TCZ-R4 - Retail Activity not exceeding 500m ² gross floor area. Generally support this rule. Generally support this rule.
S58.343	TCZ-R5	Support	Retain TCZ-R5 as notified.	TCZ-R5 - Commercial Service Activity. Generally support this rule.
S58.344	TCZ-R6	Support	Retain TCZ-R6 as notified.	TCZ-R6 - Food and Beverage Activity. Generally support this rule.
S58.345	TCZ-R7	Support	Retain TCZ-R7 as notified.	TCZ-R7 - Community Facility. Generally support this rule.
S58.346	TCZ-R8	Support	Retain TCZ-R8 as notified.	TCZ-R8 - Healthcare Activity. Generally support this rule.
S58.347	TCZ-R9	Support	Retain TCZ-R9 as notified.	TCZ-R9 - Educational Facility. Generally support this rule.
S58.348	TCZ-R10	Support	Retain TCZ-R10 as notified.	TCZ-R10 - Office activity. Generally support this rule.
S58.349	TCZ-R11	Support and seek amendment	Amend TCZ-R11 to add TCZ-R11-2.c to the public notification preclusion clause. See the submission for specific requested amendments.	TCZ-R11 - Visitor Accommodation. Seek that the public notification preclusion is extended to TCZ-R11-2.c, consistent with other rules in this Chapter.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.350	TCZ-R12	Support and seek amendment	Amend TCZ-R12 by: (1) deleting standard 1.a that restricts the number of permitted activity residential units per site to 6. (2). Delete the matters of discretion under 2.a that address the effects of residential activities. (3). Delete the public notification preclusion clause. (4). Amend the public and limited notification preclusion clause by deleting reference to LCZ-S7. (5) Make consequential amendments. See the submission for specific requested amendments.	TCZ-R12 - Residential Activities. The submitter does not consider it necessary for a limit on the number of residential units in the zone and therefore seeks amendment to remove a maximum threshold on the number of permitted residential units. The submitter also considers that it is appropriate for this rule to provide for a preclusion to limited notification, consistent with the same rules in the NCZ and LCZ.
S58.351	TCZ-R13	Support	Retain TCZ-R13 as notified.	TCZ-R13 – Supermarket. Generally support this rule.
S58.352	TCZ-R14	Support	Retain TCZ-R14 as notified.	TCZ-R14 – Emergency Service Facility. Generally support this rule.
S58.353	TCZ-R15	Support	Retain TCZ-R15 as notified.	TCZ-R15 - Sport and Active Recreation. Generally support this rule.
S58.354	TCZ-R16	Support	Retain TCZ-R16 as notified.	TCZ-R16 – Entertainment Facility. Generally support this rule.
S58.355	TCZ-R17	Support	Retain TCZ-R17 as notified.	TCZ-R17 - Large Format Retail Activity, excluding Supermarkets. Generally support this rule.
S58.356	TCZ-R18	Support	Retain TCZ-R18 as notified.	TCZ-R18 - Drive-through Activity. Generally support this rule.
S58.357	TCZ-R19	Support	Retain TCZ-R19 as notified.	TCZ-R19 - Retirement Village. Generally support this rule.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.358	TCZ-R20	Support	Retain TCZ-R20 as notified.	TCZ-R20 - Any activity not otherwise listed as permitted, restricted discretionary, discretionary or noncomplying. Generally support this rule.
S58.359	TCZ-R21	Support	Retain TCZ-R21 as notified.	TCZ-R21 - Industrial Activity. Generally support this rule.
S58.360	TCZ-R22	Support	Retain TCZ-R22 as notified.	TCZ-R22 - Yard Sale Activity / Trade Supplier. Generally support this rule.
S58.361	TCZ-R23	Support	Retain TCZ-R23 as notified.	TCZ-R23 - Motorised Recreation. Generally support this rule.
S58.362	TCZ-R24	Support	Retain TCZ-R24 as notified.	TCZ-R24 - Rural Industry. Generally support this rule.
S58.363	TCZ-R25	Support	Retain TCZ-R25 as notified.	TCZ-R25 - Primary Production. Generally support this rule.
S58.364	TCZ-S1	Support and seek amendment	Amend TCZ-S1 - Height to increase maximum permitted building height from 26 metres to 36 metres. See submission for requested amendment.	TCZ-S1 - Height. Seek an increase in the height to 36m in recognition of the prominent commercial areas which the TCZ should apply to and their capacity for future development.
S58.365	TCZ-S2	Support and seek amendment	Amend TCZ-S2 to: (1) delete reference to 'or Open Space and Recreation Zone'. (2) Insert a reference into standard 1.a. so it only applies to the Medium Density Residential Zone (which the submitter is seeking the creation of under a separate submission point). (3). Insert a new height in relation to boundary standard of 60 degrees measured from a point 8m vertically above boundaries that adjoin a site zoned High Density Residential Zone. See submission for requested amendments.	TCZ-S2 - Height in Relation to Boundary. Seek amendments to provide for more flexibility where the TCZ is adjacent to HRZ.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.366	TCZ-S3	Support	Retain TCZ-S3 as notified.	TCZ-S3 - Setback. Generally support this standard.
S58.367	TCZ-S4	Support	Retain TCZ-S4 as notified.	TCZ-S4 - Active Frontages. Generally support this standard.
S58.368	TCZ-S5	Support and seek amendment	Amend TCZ-S5 to include the following exclusion to the active frontage standard: Along active frontages identified on the planning maps all residential units must be located above ground floor level, <u>except that residential units may be located on the ground floor where pedestrian access to a residential unit does not interrupt or prevent an active frontage as required by LCZ-S4.</u>	TCS-S5 - Location of Residential Units. Seeks provision for residential units to be provided at the rear of sites, consistent with what is proposed under NCZ-S5 in the Neighbourhood Centre Zone.
S58.369	TCZ-S6	Support	Retain TCZ-S6 as notified.	TCZ-S6 - Noise and Ventilation. Generally support this standard.
S58.370	TCZ-S7	Support and seek amendment	Amend TCZ-S7 to amend the outdoor living space requirements to generally reduce the requirements. See the submission for the specific requested amendments.	TCZ-S7 - Outdoor Living Space. Support the intent of this standard and acknowledges it is taken from the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. The submitter seeks amendments to provide for greater development by specifying a lower level of outdoor living space being required in identified cases to provide for greater design flexibility.
S58.371	TCZ-S8	Support	Retain TCZ-S8 as notified.	TCZ-S8 - Screening and Landscaping of Service Areas, Outdoor Storage Areas and Parking Areas. Generally support this standard.
S58.372	TCZ-S9	Support	Retain TCZ-S9 as notified.	TCZ-S9 - Water Supply, Stormwater and Wastewater. Generally support this standard.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.373	TCZ-S10	Support and seek amendment	Amend TCZ-S10 to delete the performance measures for hydraulic neutrality and replace with a reference to the defined term 'hydraulic neutrality'.	TCZ-S10 - Hydraulic Neutrality. Seeks amendments as Hydraulic Neutrality is defined in the plan. Amendments are consistent with the relief sought on the definition for Hydraulic neutrality.
S58.374	CCZ	Support and seek amendment	Amend the CCZ spatial extent as follows: 1. Accept the changes the submitter requests to the planning maps as shown in Appendix 4 of the submission to expand the extents of the City Centre zone. 2. If the relief sought in this submission point and Appendix 4 of the submission are not granted, the following relief is sought: a. Expansion of CCZ as proposed in this submission – height variation control of 45m to HRZ. 3. Consequential amendments may be required to give effect to the changes sought in this submission.	CCZ-City Centre Zone - spatial extent. Generally supports the continued use of the CCZ but considers that the spatial extent of the CCZ does not provide for the level of intensification required to serve the surrounding residential environment.
S58.375	CCZ	Support	Retain CCZ Background text as notified.	CCZ - Background text. Generally support the amendments to the background text.
S58.376	CCZ-O1	Support	Retain CCZ-O1 as notified.	CCZ-O1 - Purpose of the CCZ- City Centre Zone. Generally support this amended objective.
S58.377	CCZ-O2	Support	Retain CCZ-O2 as notified.	CCZ-O2 - Character and Qualities of the CCZ- City Centre Zone. Generally support this amended objective.
S58.378	CCZ-O3	Support	Retain CCZ-O3 as notified.	CCZ-O3 - Interface with Residential or Open Space and Recreation Zones. Generally support this amended objective.
S58.379	CCZ-O4	Support	Retain CCZ-O4 as notified.	CCZ-O4 - Hydraulic Neutrality. Generally support this objective.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.380	CCZ-P1	Support and seek amendment	Amend CCZ-P1 to delete reference to 'character' and insert reference to 'planned urban built form'. See the submission for requested amendments.	CCZ-P1 - Appropriate Activities. Seek amendments consistent with the rest of the submission on centre zones and consistent with other similar policies proposed in the IPI.
S58.381	CCZ-P2	Support and seek amendment	<p>Amend CCZ-P2 as follows:</p> <p>(1) Remove the Design Guidelines from within the District Plan and treat them as a non-statutory tool, outside of the District Plan. Add a note added where reference is made to such guidelines as follows: <u>Note: Best practice urban design guidance is contained within the Council's Design Guidelines.</u></p> <p>(2) Delete all references to the Design Guidelines.</p> <p>(3) Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment, such as and not limited to: <u>i. Provides an effective public private interface;</u> <u>ii. Provides a well-functioning site;</u> <u>iii. Provides high quality buildings.</u> <u>iv. Responds to the natural environment.</u></p> <p>(4) If the requested relief is not provided the submitter 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</p>	CCZ-P2 - Residential Activity. Oppose the reference to a statutory design guide and seeks the relevant assessment matters instead be directly articulated in the relevant provision/matter of discretion. The submitter would support the use of non-statutory design guides as a tool to inform assessment.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			rules that a consent holder must follow and adhere to. The submitter requests the opportunity to review these guidelines if they are to remain a statutory document.	
S58.382	CCZ-P1	Support and seek amendment	Amend CCZ-P1 - 1a. to state: Residential units are located above ground floor <u>or at ground floor where located to the rear of buildings where not accessed from an active frontage;</u>	CCZ-P2 - Residential Activity. Seek reference to residential units being able to be located at the rear of buildings where not accessed from an active frontage.
S58.383	CCZ-P3	Support	Retain CCZ-P3 as notified.	CCZ-P3 – Other Activities. Generally support this amended policy.
S58.384	CCZ-P4	Support and seek amendment	Amend CCZ-P4 as follows: (1) Remove the Design Guidelines from within the District Plan and treat them as a non-statutory tool, outside of the District Plan. Add a note added where reference is made to such guidelines as follows: <u>Note: Best practice urban design guidance is contained within the Council’s Design Guidelines.</u> (2) Delete all references to the Design Guidelines. (3) Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment, such as and not limited to: <u>i. Provides an effective public private interface;</u> <u>ii. Provides a well-functioning site;</u> <u>iii. Provides high quality buildings.</u>	CCZ-P4 - Built Development. Oppose the reference to a statutory design guide and seeks the relevant assessment matters instead be directly articulated in the relevant provision/matter of discretion. The submitter would support the use of non-statutory design guides as a tool to inform assessment.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>iv. <u>Responds to the natural environment.</u> (4). If the requested relief is not provided the submitter 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. The submitter requests the opportunity to review these guidelines if they are to remain a statutory document.</p>	
S58.385	CCZ-P5	Support and seek amendment	<p>Amend CCZ-P5 as follows: (1) Remove the Design Guidelines from within the District Plan and treat them as a non-statutory tool, outside of the District Plan. Add a note added where reference is made to such guidelines as follows: <u>Note: Best practice urban design guidance is contained within the Council’s Design Guidelines.</u> (2) Delete all references to the Design Guidelines. (3) Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment, such as and not limited to: i. <u>Provides an effective public private interface;</u> ii. <u>Provides a well-functioning site;</u> iii. <u>Provides high quality buildings.</u></p>	<p>CCZ-P5 - Public Space Interface and Active Street Frontages. Oppose the reference to a statutory design guide and seeks the relevant assessment matters instead be directly articulated in the relevant provision/matter of discretion. The submitter would support the use of non-statutory design guides as a tool to inform assessment.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			iv. Responds to the natural environment. (4). If the requested relief is not provided the submitter 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. The submitter requests the opportunity to review these guidelines if they are to remain a statutory document.	
S58.386	CCZ-P6	Support	Retain CCZ-P6 as notified.	CCZ-P6 - Inappropriate Activities. Generally support this amended policy.
S58.387	CCZ-P7	Support	Retain CCZ-P7 as notified.	CCZ-P7- Interface with Residential or Open Space and Recreation Zones. Generally support this policy.
S58.388	CCZ-P8	Support	Retain CCZ-P8 as notified.	CCZ-P8 - Hydraulic Neutrality. Generally support this policy.
S58.389	CCZ- Rule table	Support	Retain CCZ- Rule table as notified.	CCZ- Rules. Generally support the rule table.
S58.390	CCZ-R1	Support	Retain CCZ-R1 as notified.	CCZ-R1 – Commercial Service Activity. Generally support this rule.
S58.391	CCZ-R2	Support	Retain CCZ-R2 as notified.	CCZ-R2 – Retail Activities. Generally support this rule.
S58.392	CCZ-R3	Support	Retain CCZ-R3 as notified.	CCZ-R3 – Office Activity. Generally support this rule.
S58.393	CCZ-R4	Support	Retain CCZ-R4 as notified.	CCZ-R4 – Visitor Accommodation. Generally support this rule.
S58.394	CCZ-R5	Support	Retain CCZ-R5 as notified.	CCZ-R5 – Community Facility. Generally support this rule.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.395	CCZ-R6	Support and seek amendment	<p>Amend CCZ-R6 as follows:</p> <p>(1) Remove the Design Guidelines from within the District Plan and treat them as a non-statutory tool, outside of the District Plan. Add a note added where reference is made to such guidelines as follows: <u>Note: Best practice urban design guidance is contained within the Council’s Design Guidelines.</u></p> <p>(2) Delete all references to the Design Guidelines.</p> <p>(3) Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment, such as and not limited to:</p> <ul style="list-style-type: none"> <u>i. Provides an effective public private interface;</u> <u>ii. Provides a well-functioning site;</u> <u>iii. Provides high quality buildings.</u> <u>iv. Responds to the natural environment.</u> <p>(4). If the requested relief is not provided the submitter 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. The submitter requests the opportunity to review these guidelines if they are to remain a statutory document.</p>	<p>CCZ-R6 - Residential Activity. Oppose the reference to a statutory design guide and seeks the relevant assessment matters instead be directly articulated in the relevant provision/matter of discretion. The submitter would support the use of non-statutory design guides as a tool to inform assessment.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.396	CCZ-R6	Support and seek amendment	Amend CCZ-R6 non-notification clause under CCZ-R6(2) and CCZ-R6(3) as follows: Notification: An application under this rule is precluded from being publicly or limited notified in accordance with section 95A of the RMA.	CCZ-R6 - Residential Activity. The submitter considers that the Restricted Discretionary Activity under this rule should be provided for without the need for public or limited notification, noting that the non-compliance would generate effects relating to internal amenity and active edges, both of which are technical in nature and would not benefit from public or limited notification.
S58.397	CCZ-R7	Support and seek amendment	Amend CCZ-R7 standard 1.2.a, and 2.3.a. to delete reference to CCZ-R14 and replace it with CCZ-R7. See submission for requested amendment.	CCZ-R7 - Erection, Construction and Development of Additions to Existing Buildings. Note there is incorrect reference to R14.
S58.398	CCZ-R7	Support and seek amendment	Amend CCZ-R7 as follows: (1) Remove the Design Guidelines from within the District Plan and treat them as a non-statutory tool, outside of the District Plan. (2) Delete all references to the Design Guidelines. (3) Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment, such as and not limited to: <u>i. Provides an effective public private interface;</u> <u>ii. Provides a well-functioning site;</u> <u>iii. Provides high quality buildings.</u> <u>iv. Responds to the natural environment.</u> (4) If the requested relief is not provided the submitter seeks that the design guidelines are amended, simplified and written in a manner that is easy to follow.	CCZ-R7 - Erection, Construction and Development of Additions to Existing Buildings. Consistent with its broader submission, Kāinga Ora opposes the reference to a statutory design guide and seeks the relevant assessment matters instead be directly articulated in the relevant provision/matter of discretion. Kāinga Ora would support the use of non-statutory design guides as a tool to inform assessment.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			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. The submitter requests the opportunity to review these guidelines if they are to remain a statutory document.	
S58.399	CCZ-R8	Support	Retain CCZ-R8 as notified.	CCZ-R8 - Entertainment Activity. Generally support this rule.
S58.400	CCZ-R9	Support and seek amendment	<p>Amend CCZ-R9 as follows:</p> <p>(1) Remove the Design Guidelines from within the District Plan and treat them as a non-statutory tool, outside of the District Plan.</p> <p>(2) Delete all references to the Design Guidelines.</p> <p>(3) Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment, such as and not limited to:</p> <ul style="list-style-type: none"> i. <u>Provides an effective public private interface;</u> ii. <u>Provides a well-functioning site;</u> iii. <u>Provides high quality buildings.</u> iv. <u>Responds to the natural environment.</u> <p>(4) If the requested relief is not provided the submitter 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</p>	CCZ-R9 - Large Format Retail. Consistent with its broader submission, Kāinga Ora opposes the reference to a statutory design guide and seeks the relevant assessment matters instead be directly articulated in the relevant provision/matter of discretion. Kāinga Ora would support the use of non-statutory design guides as a tool to inform assessment.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			rules that a consent holder must follow and adhere to. The submitter requests the opportunity to review these guidelines if they are to remain a statutory document.	
S58.401	CCZ-S1	Support	Retain CCZ-S1 as notified.	CCZ-S1 - Fences and Standalone Walls. Generally support this standard.
S58.402	CCZ-S2	Support	Retain CCZ-S2 as notified.	CCZ-S2 - Setback. Generally support this standard.
S58.403	CCZ-S3	Support and seek amendment	Amend CCZ-S3 and replace with the submitter's requested amendments as follows: All residential units must be located above ground floor level. <u>Along active frontages identified on the planning maps all residential units must be located above ground floor level, except that residential units may be located on the ground floor where pedestrian access to a residential unit does not interrupt or prevent an active frontage as required by CCZ-S8.</u>	CCZ-S3 - Location of Residential Units. Seek an amendment to allow residential units to be located at ground floor level if located at the rear of a building, consistent with the NCZ.
S58.404	CCZ-S4	Support and seek amendment	Delete CCZ-S4 and replace with the submitter's requested amendments as follows: <u>Buildings and structures must not project beyond a:</u> <u>a. For boundaries with the High Density Residential Zone:</u> <u>i. 60° recession plane measured from a point 19m vertically above ground level along the first 20m of the side boundary as measured from the road frontage;</u> <u>ii. 60° recession plane measured from a</u>	CCZ-S4 - Height in Relation to Boundary. The submitter considers the standard restrains development to a greater degree than should occur in the CCZ. Kāinga Ora seeks deletion of the current wording and replacement with alternative wording that provides greater development capacity.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>point 8m vertically above ground level along all other boundaries;</u> <u>Where the boundary forms part of a legal right of way, entrance strip, access site, or pedestrian access way, the height in relation to boundary applies from the farthest boundary of that legal right of way, entrance strip, access site, or pedestrian access way.</u> <u>c. Residential chimneys, electricity transmission towers, masts, radio, television and telecommunication antenna and aerials.</u></p>	
S58.405	CCZ-S5	Support	Retain CCZ-S5 as notified.	CCZ-S5 - Noise and Ventilation. Generally support this standard.
S58.406	CCZ-S6	Support	Retain CCZ-S6 as notified.	CCZ-S6 - Water Supply, Stormwater and Wastewater. Generally support this standard.
S58.407	CCZ-S7	Support and seek amendment	<p>Amend CCZ-S7 as follows:</p> <p>(1) Remove the Design Guidelines from within the District Plan and treat them as a non-statutory tool, outside of the District Plan.</p> <p>(2) Delete all references to the Design Guidelines.</p> <p>(3) Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment, such as and not limited to:</p> <p><u>i. Provides an effective public private interface;</u> <u>ii. Provides a well-functioning site;</u></p>	<p>CCZ-S7 - Service Areas, Outdoor Storage Areas and Parking Areas. Consistent with its broader submission, the submitter opposes the reference to a statutory design guide and seeks the relevant assessment matters instead be directly articulated in the relevant provision/matter of discretion. The submitter would support the use of non-statutory design guides as a tool to inform assessment.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>iii. Provides high quality buildings.</u> <u>iv. Responds to the natural environment.</u> (4). If the requested relief is not provided the submitter 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. The submitter requests the opportunity to review these guidelines if they are to remain a statutory document.</p>	
S58.408	CCZ-S8	Support and seek amendment	<p>Amend CCZ-S8 as follows: (1) Remove the Design Guidelines from within the District Plan and treat them as a non-statutory tool, outside of the District Plan. (2) Delete all references to the Design Guidelines. (3) Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment, such as and not limited to: <u>i. Provides an effective public private interface;</u> <u>ii. Provides a well-functioning site;</u> <u>iii. Provides high quality buildings.</u> <u>iv. Responds to the natural environment.</u> (4). If the requested relief is not provided the submitter seeks that the design guidelines are amended, simplified and written in a manner that is easy to follow.</p>	<p>CCZ-S8 - Active Frontages. Consistent with its broader submission, the submitter opposes the reference to a statutory design guide and seeks the relevant assessment matters instead be directly articulated in the relevant provision/matter of discretion. The submitter would support the use of non-statutory design guides as a tool to inform assessment.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			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. The submitter requests the opportunity to review these guidelines if they are to remain a statutory document.	
S58.409	CCZ-S9	Support and seek amendment	Amend CCZ-S9 by deleting the performance criteria for hydraulic neutrality and replacing it with a reference to the defined term for hydraulic neutrality. See the submission for requested amendments.	CCZ-S9 - Hydraulic Neutrality. Generally supports this standard, but seeks amendments as Hydraulic Neutrality is defined in the plan. Amendments are consistent with the relief sought on the definition for Hydraulic neutrality.
S58.410	CCZ-R10	Support	Retain CCZ-R10 as notified.	CCZ-R10 – Food and Beverage Activity. Generally support this rule.
S58.411	CCZ-R11	Support	Retain CCZ-R11 as notified.	CCZ-R11 – Healthcare Activity. Generally support this rule.
S58.412	CCZ-R12	Support	Retain CCZ-R12 as notified.	CCZ-R12 – Demolition. Generally support this rule.
S58.413	CCZ-R13	Support and seek amendment	Amend CCZ-R13 as follows: (1) Remove the Design Guidelines from within the District Plan and treat them as a non-statutory tool, outside of the District Plan. (2) Delete all references to the Design Guidelines. (3) Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment, such as and not limited to:	CCZ-R13 - Redevelopment, Alteration and Repair of Existing Buildings. Consistent with its broader submission, the submitter opposes the reference to a statutory design guide and seeks the relevant assessment matters instead be directly articulated in the relevant provision/matter of discretion. The submitter would support the use of non-statutory design guides as a tool to inform assessment.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>i. <u>Provides an effective public private interface;</u> ii. <u>Provides a well-functioning site;</u> iii. <u>Provides high quality buildings.</u> iv. <u>Responds to the natural environment.</u> (4). If the requested relief is not provided the submitter 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. The submitter requests the opportunity to review these guidelines if they are to remain a statutory document.</p>	
S58.414	CCZ-R15	Support	Retain CCZ-R15 as notified.	CCZ-R15 – Educational Facility. Generally support this rule.
S58.415	CCZ-R16	Support and seek amendment	<p>Amend CCZ-R16 as follows: (1) Remove the Design Guidelines from within the District Plan and treat them as a non-statutory tool, outside of the District Plan (2) Delete all references to the Design Guidelines. (3) Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment, such as and not limited to: i. <u>Provides an effective public private interface;</u> ii. <u>Provides a well-functioning site;</u></p>	CCZ-R16 - New Buildings and Structures. Consistent with its broader submission, the submitter opposes the reference to a statutory design guide and seeks the relevant assessment matters instead be directly articulated in the relevant provision/matter of discretion. The submitter would support the use of non-statutory design guides as a tool to inform assessment.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>iii. Provides high quality buildings.</p> <p>iv. Responds to the natural environment.</p> <p>(4). If the requested relief is not provided the submitter 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. The submitter requests the opportunity to review these guidelines if they are to remain a statutory document.</p>	
S58.416	CCZ-R17	Support	Retain CCZ-R17 as notified.	CCZ-R17 - Emergency Service Facility. Generally support this rule.
S58.417	CCZ-R18	Support	Retain CCZ-R18 as notified.	CCZ-R18 – Sport and Active Recreation. Generally support this rule.
S58.418	CCZ-R19	Support	Retain CCZ-R19 as notified.	CCZ-R19 – Retirement Village. Generally support this rule.
S58.419	CCZ-R20	Support	Retain CCZ-R20 as notified.	CCZ-R20 – Drive-through Activity. Generally support this rule.
S58.420	CCZ-R21	Support	Retain CCZ-R21 as notified.	CCZ-R21 - Any activity not otherwise listed as permitted, restricted discretionary, discretionary, or non-complying. Generally support this rule.
S58.421	CCZ-R22	Support	Retain CCZ-R22 as notified.	CCZ-R22 - Industrial Activity. Generally support this rule.
S58.422	CCZ-R23	Support	Retain CCZ-R23 as notified.	CCZ-R23 - Yard Sale Activity / Trade Supplier. Generally support this rule.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S58.423	CCZ-R24	Support	Retain CCZ-R24 as notified.	CCZ-R24 - Motorised Recreation. Generally support this rule.
S58.424	CCZ-R25	Support	Retain CCZ-R25 as notified.	CCZ-R25 - Primary Production. Generally support this rule.
S58.425	CCZ-R26	Support	Retain CCZ-R26 as notified.	CCZ-R26 - Rural Industries. Generally support this rule.
S58.426	Design Guidelines	Oppose	<p>The submitter seeks following:</p> <p>(1) Remove the Design Guidelines from within the District Plan and treat them as a non-statutory tool, outside of the District Plan.</p> <p>(2) Delete all references to the Design Guidelines.</p> <p>(3) Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment, such as and not limited to:</p> <p><u>i. Provides an effective public private interface;</u></p> <p><u>ii. Provides a well-functioning site;</u></p> <p><u>iii. Provides high quality buildings.</u></p> <p><u>iv. Responds to the natural environment.</u></p> <p>(4). If the requested relief is not provided the submitter 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</p>	<p>Appendix 1 – Medium and High Density Design Guide. The submitter opposes the inclusion of Design Guides in the Plan, which act as de facto rules to be complied with. The submitter opposes any policy or rule that requires development proposals to be consistent with such design guidelines in the District Plan. The submitter alternatively seeks and supports the design guidelines for residential subdivision, multi-unit development and residential development in commercial centres sitting outside the Plan as guidance regarding best practice design outcomes. The Design Guides should be treated as a non-statutory tool. If there is content of a Design Guide that Council wants in the Plan, the submitter seeks that these are relocated within a specific rule, matter of discretion or assessment criterion. Where particular design outcomes are to be achieved, these should be specified in matters of discretion or assessment. The submitter seeks all necessary consequential changes to give effect to the relief sought.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			and adhere to. The submitter requests the opportunity to review these guidelines if they are to remain a statutory document. See the submission for full reasoning and requested amendments.	
S58.427	Design Guidelines	Oppose	<p>The submitter seeks following:</p> <p>(1) Remove the Design Guidelines from within the District Plan and treat them as a non-statutory tool, outside of the District Plan.</p> <p>(2) Delete all references to the Design Guidelines.</p> <p>(3) Where particular design outcomes are to be achieved, these should be specifically stated in matters of discretion or assessment, such as and not limited to:</p> <ul style="list-style-type: none"> <u>i. Provides an effective public private interface;</u> <u>ii. Provides a well-functioning site;</u> <u>iii. Provides high quality buildings.</u> <u>iv. Responds to the natural environment.</u> <p>(4). If the requested relief is not provided the submitter 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. The submitter requests the opportunity to review these guidelines if they are to remain a statutory document.</p>	Appendix 2 – City Centre Design Guide. The submitter opposes the inclusion of Design Guides in the Plan, which act as de facto rules to be complied with. The submitter opposes any policy or rule that requires development proposals to be consistent with such design guidelines in the District Plan. The submitter alternatively seeks and supports the design guidelines for residential subdivision, multi-unit development and residential development in commercial centres sitting outside the Plan as guidance regarding best practice design outcomes. The Design Guides should be treated as a non-statutory tool. If there is content of a Design Guide that Council wants in the Plan, the submitter seeks that these are relocated within a specific rule, matter of discretion or assessment criterion. Where particular design outcomes are to be achieved, these should be specified in matters of discretion or assessment. The submitter seeks all necessary consequential changes to give effect to the relief sought.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			See the submission for full reasoning and requested amendments.	
Submitter 59: Kevin von Keisenberg				
S59.1	Entire IPI	Not stated	More consultation and information are required.	There is obviously a need for more housing. However, if the proposed as it stands goes ahead it will have a detrimental effect on the Silverstream/Pinehaven area. The park and ride area at Silverstream Station is at full capacity every weekday at present.
Submitter 60: John A Sutton				
S60.1	Entire IPI	Oppose	Adopt the same, sensible level of courage and democratic resolve displayed by the Christchurch City Council's Mayor and Councillors and join them in formally objecting to the imposition of the NPS-UD levels of intensification and convey this to the Minister for the Environment	<p>My residential street - Heretaunga Square - is within the High Density Residential Zone set out in the proposed IPI dated July 2022.</p> <p>Despite the raft of proposed new Objectives, new Policies and new Rules set out in the IPI, every one of my objections to the changes proposed last year under Plan Change 50 and which I formally submitted to you in September 2021 remain relevant and continue as strong objections to the July 2022 IPI.</p> <p>Changes providing for carefully planned growth and reasonable intensification of residential land use up to a maximum of 3 storeys would be acceptable to me and welcomed but only when this intensification includes mandatory off street car parking for each residential unit, and only when the height in relation to boundary is far less permissive than proposed, and only when the removal of any existing trees, native or otherwise, is specifically consulted upon with all proximate residential neighbours prior to consent being issued.</p> <p>The utter madness of the standard 20 metre/discretionary 26 metre height provision which will allow up to 8 storey residential buildings in Heretaunga Square, and the resulting loss of privacy, sun, green space, shelter, and the destruction of the well-functioning character of the existing one and two</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>storey homes in Heretaunga Square that will result. This will defeat the NPS-UD 2020 Objective 1 of: “providing a well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future”.</p> <p>The proposed intensification provisions are strongly objected to because they will not, despite your utterances in the IPI to the contrary, deliver “a well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future” (UFD-01)</p> <p>My submission also relates to, and strongly objects to, the intensification that will accompany the St Patrick’s Estate Precinct.</p> <p>In respect of the St Patrick’s Estate Precinct, I submit my similarly strong objection to this being a High Density Residential Zone because:</p> <ol style="list-style-type: none"> a. You have provided no detailed analysis of, or mitigation for, the detrimental effect this density in this area will have on traffic congestion and flow; b. The intensification proposed is unacceptable as it will create slums and an eyesore at the entrance to Fergusson Drive, and will destroy the current well-functioning urban environment, not create one as is required under NPS-UD <p>I continue to submit, as I did in my submission last year, that all elements of your proposed intensification for my street, Heretaunga Square, are unacceptable because the social and environmental impact of this level of intensification gives no weight whatsoever to, and will destroy, the liveability, amenity,</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>social well-being, and the well-functioning environment that I, and fellow residents of my street, currently enjoy</p> <p>Your refusal under this IPI - as was your refusal under last year's PC 50 – to understand the devastating ghetto outcome of cars littering residential streets because you will not require off street parking as a critical element of the intensification you propose really beggars' belief and is, again, utterly unacceptable.</p>
S60.2	Entire IPI	Oppose	<p>Tell the Minister for the Environment that the unplanned wholesale haphazard intensification of Upper Hutt under the NPS-UD will destroy Upper Hutt's current well-functioning urban environment, not create one as is required under NPS-UD and that this level of intensification gives no weight whatsoever to liveability or amenity and is unacceptable to Upper Hutt City Council</p>	<p>First, rather than purposefully burying on your website your PDF that summarised last year's submissions and which shows that the majority of submitters did not support the PC 50 residential proposed changes, why don't you have the democratic spine to: a) clearly let us know that result; and b) what, if anything, it has led you to reconsider in the proposed IPI, and if not why not?</p> <p>The 26 metre height level of intensification will do nothing other than create physical, social, and psychological silos which will destroy the very community fabric of my street – which both defeats NPS-UD 2020 Objective 1 and to which I strongly object.</p> <p>Up to 8 storey residential buildings among our one and two storey homes in Heretaunga Square will destroy our existing building form and style and the community that is unique to living in a "residential square" – again defeating NPS-UD 2020 under its Objective 1</p> <p>I continue to submit, as I did in my submission last year, that all elements of your proposed intensification for my street, Heretaunga Square, are also unnecessary to meet your population growth projections because, as I carefully explained and analysed in my submission last year, the high level of your growth projections for Upper Hutt is flawed and simply wrong</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S60.3	Entire IPI	Oppose	Be prepared to risk being bullied by a government that uses the instrument of the NPS-UD to shackle you into haphazard and socially unacceptable levels of residential intensity, that are simply not necessary for Upper Hutt	<p>Secondly, I note that when it suits you are prepared to confront central government and physically turn up to Parliament to reject the current 3 Waters proposal, yet you continue to fawn to central government's NPS-UD by taking no stand against it and thus ignoring the majority of submissions already in your hands that do not support the levels of intensification proposed. This inconsistency in your behaviour is shameful and utterly unacceptable.</p> <p>The proposed IPI new Rules for compliance in respect of: building height (HRZ-S2), height in relation to boundary (HRZ-S3), building coverage (HRZ-S4), and number of units per site (HRZ-S5) are demonstrably too permissive and will result in the destruction of the liveability, amenity value and quality of life that I and residents of my street currently enjoy</p>
S60.4	Entire IPI	Oppose	Develop an Intensification Plan to submit to government (and residents!) that is not driven by flawed population growth projections, nor driven by haphazard intensification, nor driven by the lunacy of the current NPS-UD, but that respects the current levels of amenity, privacy, sunlight, and green space enjoyed in Upper Hutt while at the same time allowing for carefully planned and reasonable intensification of residential land use up to a maximum of 3 storeys provided any intensification includes mandatory off street car parking for each residential unit and with boundary height restrictions that are sensibly restrictive	The proposed High Density Residential Rules, which continue to parrot the intensification madness of NPS-UD 2020, are all objected to.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			rather than the unacceptable proposed level of permissiveness	
Submitter 61: Pru Keisenberg				
S61.1	Rezoning and Precincts	Not stated	Cease the development of the Pinehaven Hills (Guilford). The potential for flooding and erosion is vast. The infrastructure cannot support this development.	<p>The Pinehaven Hills are not suitable to sustain intensive development as proposed. The potential for ongoing slips and erosion is massive as is the flooding of areas that are already developed below and that feed into the Silverstream stream and Hutt River.</p> <p>The number of sections on the St Pats Estate to remain within stated numbers only.</p>
Submitter 62: Silverstream Land Holdings Limited				
S62.1	Rezoning	Seek amendment	Amend the zoning of the St Patrick's Estate Precinct to Mixed Use Zone. The submission includes a considerable amount of reasoning and justification for all the requested amendments as a suite. See the submission for full reasoning and justification for these requested amendments.	Amend the zoning of the Pt Patrick's Estate Precinct from High Density Residential Zone to Mixed Use Zone. The submitter considers that the MUZ, described as providing for a 'wide range of activities' that include residential, retail, commercial, recreational, and entertainment activities provides the greatest range of options for the site in a manner that is consistent with the existing range of activities provided for the site currently provided by the district plan. The submitter considers the change in zoning would not preclude residential development on the site as provided for by the HDRZ. Moreover, the bulk and density standards provided for by the MUZ mirror that of the HDRZ meaning that the change in zoning does not foreclose residential development opportunities, or density of development, as provided for the HDRZ. MUZ zoning provides the greatest level of flexibility for the future development opportunities for the strategically important development site.
S62.2	Precincts	Support and seek amendment	Move the proposed St Patrick's Estate Precinct provisions into the MUZ chapter.	Retain the Precinct approach proposed for the St Patrick's Estate site but transfer the Precinct provisions into the MUZ Chapter.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S62.3	Fix errors and consistency of language / Consequential amendments	Seek amendment	Amend via either of the following three options: (1). Combine the St Patrick's College and St Patrick's Urban Precincts into a single St Patrick's Estate Precinct.	The reference to the 'St Patrick's Estate Precinct' is inconsistent between the District Plan text and the proposed mapping. The mapping does not refer to the St Patrick's Estate Precinct, but rather the St Patrick's Urban Precinct and the St Patrick's College Precinct. Together they are understood to make up the St Patrick's Estate Precinct. This inconsistency should be corrected, and any consequential changes made to give effect to the correction.
S62.4	Precincts	Seek amendment	Amend the St Patrick's Estate Precinct by : (1). Inserting the following text: The St Patrick's Estate is strategically located in proximity to State Highway 2, provides a regionally significant development opportunity, and is within ...; (2). Delete reference to 'high density residential development' and replace it with 'a range of activities'; (3). Delete references to 'High Density Residential Zone' and replace with 'Mixed Use Zone'; (4). Make consequential amendments. See the submission for requested amendments.	An existing Precinct description is included within the HDRZ chapter. It is requested this be moved to the MUZ chapter. Amendments are also sought to the description of the St Patrick's Estate Precinct to better recognise the strategic importance of the site, its development potential. and the range of activities that could occur on it commensurate with the MUZ.
S62.5	Precincts	Seek amendment	Amend the St Patrick's Estate Precinct objective so it refers to the 'Mixed Use Zone', delete reference to 'High Density Residential Zone'.	The proposed St Patrick's Estate Precinct objective refers to the objectives and policies of the underlying zone. A consequential change is required to reflect the requested change of zoning to MUZ.
S62.6	MUZ-PREC2-O2	Seek amendment	Insert the following new objective into the St Patrick's Estate Precinct provisions: 'MUZ-PREC2-O2 - St Patrick's Estate Precinct. The St Patrick's Estate Precinct is	Request a St Patrick's Estate Precinct-specific objective to support the precinct.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			recognised as a development site of regional significance and a wide range of activities are enabled on the site through the Mixed Use Zone.'	
S62.7	Precincts	Seek amendment	Make consequential amendments to the St Patrick's Estate Precinct policy to reflect the requested rezoning to MUZ. See the submission for specific requested amendments.	Make consequential amendments to the St Patrick's Estate Precinct policy to reflect the requested rezoning to MUZ.
S62.8	HRZ-PREC2-R1	Seek amendment	Make consequential amendments to HRZ-PREC2-R1 - resulting from the requested rezoning of the St Patrick's Estate Precinct to MUZ. See the submission for requested amendments.	HRZ-PREC2-R1 - Permitted Activities. Make consequential amendments resulting from the requested rezoning of the St Patrick's Estate Precinct to MUZ.
S62.9	HRZ-PREC2-R2	Seek amendment	Make consequential amendments to HRZ-PREC2-R2 - resulting from the requested rezoning of the St Patrick's Estate Precinct to MUZ. See the submission for requested amendments.	HRZ-PREC2-R2 - Controlled Activities. Make consequential amendments resulting from the requested rezoning of the St Patrick's Estate Precinct to MUZ.
S62.10	HRZ-PREC2-R3	Seek amendment	Make consequential amendments to HRZ-PREC2-R3 - resulting from the requested rezoning of the St Patrick's Estate Precinct to MUZ. See the submission for requested amendments.	HRZ-PREC2-R3 - Restricted Discretionary Activities. Make consequential amendments resulting from the requested rezoning of the St Patrick's Estate Precinct to MUZ.
S62.11	HRZ-PREC2-R5	Seek amendment	Make consequential amendments to HRZ-PREC2-R5 - resulting from the requested rezoning of the St Patrick's Estate Precinct to MUZ. See the submission for requested amendments.	HRZ-PREC2-R5 - Discretionary Activities. Make consequential amendments resulting from the requested rezoning of the St Patrick's Estate Precinct to MUZ.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S62.12	HRZ-PREC2-R6	Seek amendment	Make consequential amendments to HRZ-PREC2-R7 - resulting from the requested rezoning of the St Patrick's Estate Precinct to MUZ. See the submission for requested amendments.	HRZ-PREC2-R7 - Prohibited Activities. Make consequential amendments resulting from the requested rezoning of the St Patrick's Estate Precinct to MUZ.
S62.13	HRZ-PREC2-R7	Seek amendment	Make consequential amendments to HRZ-PREC2-R7 - resulting from the requested rezoning of the St Patrick's Estate Precinct to MUZ. See the submission for requested amendments.	HRZ-PREC2-R7 - Prohibited Activities. Make consequential amendments resulting from the requested rezoning of the St Patrick's Estate Precinct to MUZ.
S62.14	MUZ - Mixed Use Zone	Seek amendment	Amend the MUZ Introduction text to remove the restriction of residential on ground floor. Alternatively, amend the introduction to the MUZ chapter to clarify that residential at ground floor is envisaged within the St Patrick's Estate Precinct.	Mixed Use Zone Chapter Introduction. The introduction states that the MUZ provides for a range of activities including residential over commercial. However, the provisions do not include any restriction of residential on ground level. An amendment to the introduction text is requested to make it consistent with the provisions. Alternatively, in the event that the introduction reflects the intention of the provisions, that being the restriction of residential development on ground level, the submitter requests specific provision for ground level residential be provided for the St Patrick's Estate Precinct.
S62.15	MUZ - Mixed Use Zone	Seek amendment	Amend the introduction to the Mixed Use Zone by adding the following amended text from the HDRZ chapter: "Within the High Density Residential Zone Mixed Use Zone, development within the St Patrick's Estate Precinct will maintain and enhance linkages to the e Hutt River walkway and Silverstream Railway Station."	Mixed Use Zone Chapter Introduction. Move the proposed Introduction to the HDRZ that refers to development within the St Patrick's Estate Precinct to the MUZ chapter as a consequential amendment.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S62.16	MUZ-O1	Seek amendment	Amend MUZ-O1 by deleting reference to "surrounding". See the submission for specific requested amendment.	MUZ-O1. Given the range of activities that the zone provides for, including large format retailing, commercial development, entertainment and recreational activities, the submitter notes the activities may ultimately service a wider catchment area than "surrounding residential catchments". The submitter considers the use of the term "surrounding" creates uncertainty, and requests it be deleted from the objective.
S62.17	MUZ-P1	Seek amendment	Amend MUZ-P1 by deleting reference to "surrounding from clause 2 of the submission". See the submission for specific requested amendment.	MUZ-P1. Given the range of activities that the zone provides for, including large format retailing, commercial development, entertainment and recreational activities, the submitter notes the activities may ultimately service a wider catchment area than "surrounding residential catchments". The submitter considers the use of the term "surrounding" creates uncertainty, and requests it be deleted from the policy.
S62.18	MUZ-P2	Support	Retain MUZ-P2 as notified.	MUZ-P2. The policy appropriately provides for residential development in the MUZ.
S62.19	MUZ-P5	Support	Retain MUZ-P5 as notified.	MUZ-P5. The policy appropriately provides for built development in the MUZ.
S62.20	MUZ-R1	Support	Retain MUZ-R1 as notified.	MUZ-R1. The rule appropriately controls buildings and structures in the MUZ.
S62.21	MUZ-R4	Support	Retain MUZ-R4 as notified.	MUZ-R4. The rule provides for retain activity and large format retailing as a permitted activity subject to compliance with a landscaping and screening standard. The submitter considers this is appropriate.
S62.22	MUZ-PREC1-R1 – New rule	Seek amendment	Include a new rule MUZ-PREC1-R1 to provide for garden centres as a permitted activity within the St Patrick's Estate	MUZ - New rule. The submitter requests that 'garden centre' be specifically provided for to avoid the possibility they are not caught by the provisions and definitions for 'retailing' and/or 'large format retailing'.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			Precinct; OR provide for garden centres as a permitted activity across the MUZ.	
S62.23	MUZ - New rule	Seek amendment	Provide for supermarkets as a permitted activity within the St Patrick's Estate Precinct; OR clarify as part of the existing definition of 'large format retail' that it is inclusive of supermarkets.	MUZ - New rule. While the definitions of 'retail activity' and 'large format retail' are broad, the submitter notes the district plan includes a separate definition for 'supermarket'. The submitter seeks that 'supermarket activity' is provided for directly to avoid doubt.
S62.24	MUZ - New rule	Seek amendment	Amend the proposed St Patrick Estate Precinct provisions, as transferred to the MUZ, to provide for the educational activity functions of the St Patrick's College site as a permitted activity.	MUZ - New rule. The St Patrick's College within the St Patrick's Estate Precinct operates without the benefit of a designation to provide for its educational activity functions. The proposed HDRZ provisions would make educational activities a discretionary activity. Under the proposed MUZ provisions educational activities are provided for as a permitted activity but are limited to 500m ² gross floor area per facility. The submitter seeks that the educational activity functions of the existing St Patrick's College are provided for as a permitted activity.
S62.25	MUZ - Mixed Use Zone	Seek amendment	Amend the MUZ subdivision provisions by including, as necessary, subdivision provisions from the HDRZ relevant to the St Patrick's Estate Precinct.	Subdivision Chapter. The submitter is comfortable with the proposed changes to the subdivision provisions for the HDRZ and specific provisions for the St Patrick's Estate Precinct, however the requested rezoning of the Precinct to MUZ will require changes to the relevant subdivision provisions.
Submitter 63: Alex Stopforth				
S63.1	MDRS	Seek amendment	Council should consider specific rules stating that a three storey residential building cannot be built with any of its living, or dining spaces (indoor or outdoor) adjacent to or overlooking any neighbour's living, dining or outdoor spaces such as lawns, gardens or patios	Not stated

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			(but not driveways, or garages). I don't know if this conflicts with the new medium density standards but presume it's possible to develop some additional rules like this which preserve privacy while not interfering with the new medium density standards.	
Submitter 64: Retirement Villages Association of New Zealand				
S64.1	New Definition	Support and seek amendment	Add the following definition: 'retirement unit'. Retirement Unit means <u>any unit within a retirement village that is used or designed to be used for a residential</u>	'Retirement unit' definition is required to acknowledge the differences from typical residential activities in terms of layout and amenity needs.
S64.2	UFD-O1	Support	Retain Objective UFD-O1 as notified.	Support UFD-O1 as it aligns with Objective 1 of the MDRS.
S64.3	UFD-O2	Support	Retain Objective UFD-O2 as notified.	Support UFD-O2 as it aligns with Objective 2 of the MDRS.
S64.4	UFD-O3	Support and seek amendment	Amend UFD-O3 as follows: 1. Identified housing needs and demand.	Support UFD-O3 as it aligns with Policy 3 of the NPSUD. However, it opposes the need for housing needs and demand to be 'identified' as it is unclear what this entails and is contrary to Policy 3.
S64.5	UFD-OX – New objective	Seek amendment	Insert a new objective that provides for the housing and care needs of the ageing population as follows: <u>UFD-Ox Ageing population: Recognise and enable the housing and care needs of the ageing population.</u>	An ageing population specific objective should be included that recognises and enables the housing and care needs of the ageing population.
S64.6	UFD-P1	Oppose	Expressly exclude retirement villages from UFD-P1.	Oppose UFD-P1, as the Medium and High Density Design Guide makes no specific reference to retirement villages, with no guidance as to why the same requirements applying to non-retirement village activities also apply to retirement villages

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				(despite retirement villages being a unique activity with substantially differing functional and operational needs).
S64.7	UFD-P2	Support	Retain UFD-P2 as notified.	Support UFD-P2 as it aligns with the urban environment intensification provisions sought by the NPS-UD and enables heights and densities of the urban built form that will facilitate increased intensification in the City's urban environments.
S64.8	Strategic Direction – Urban Form and Development – Residential Explanation	Oppose	Amend the Residential Explanation as follows: ...and will be a matter of discretion for medium and high density residential development that requires a resource consent (<u>except for retirement villages</u>).	Oppose the use of the Medium and High Density Design Guide as guidance for design outcomes and / or a matter of discretion for all medium and high density residential developments. Seek that retirement villages are excluded from the applicability of the Medium and High Density Design Guide and instead assessed against any built form standards they infringe. Retirement villages can be 'well-designed' without being consistent with design guidelines.
S64.9	CMU-O1	Support	Retain CMU-O1 as notified.	Supports CMU-O1 as it aligns with Objective 1 of the MDRS.
S64.10	CMU-O4	Oppose and seek amendment	Amend CMU-O4 to provide for residential activities in the Neighbourhood Centre Zone.	Support CMU-O4 and the provision for residential activities in the City Centre Zone, the Silverstream Town Centre and Local Centre Zones. However, the seek to amend the objective to also include the provision for residential activities in the Neighbourhood Centre Zone (consistent with Policy 3 of the NPSUD).
S64.11	CMU-O5	Support	Retain CMU-O5 as notified.	Support CMU-O5 and the provision for residential activities in the Mixed Use Zone.
S64.12	Financial contributions	Oppose and seek amendment	Seek amendments to: a) Ensure the dual financial and development contributions regimes will not result in double dipping;	Concerned that Chapter 12 as proposed will result in 'double dipping' under the dual financial and development contribution regimes as both financial contribution and development contributions cover water, wastewater, stormwater, and transport infrastructure. Also concerned that Chapter 12 does

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>b) Provide certainty as to the financial contributions that will be required to be paid;</p> <p>c) Ensure the calculation methodology takes into account cost of works undertaken as part of development; and)</p> <p>Provide a retirement village-specific regime for retirement villages that takes into account their substantially lower demand profile compared to standard residential developments.</p>	not clearly set out the financial contributions that will be required, particularly for offsetting environmental effects of residential intensification activities, or recognise the bespoke demand characteristics of retirement villages or works carried out as part of development.
S64.13	SIGN-R3 and SIGN-S2	Oppose and seek amendment	Amend SIGN-R3 and SIGN-S2 and other related standards to provide for two signs of up to 3m2 per site as a permitted activity for retirement villages.	Supports permitted activity status for signs in SIGN-R3, but considers the applicable standards are too restrictive. For example, under SIGN-S2 a retirement village would be restricted to one sign of less than 1.5 m2. This provision is not sufficient for wayfinding to a village.
S64.14	All Zones - Policies	Support and seek amendment	<p>Seek a new policy is included in all zones that recognises the intensification opportunities provided by larger sites:</p> <p><u>Larger sites: Recognise the intensification opportunities provided by larger sites within all residential zones by providing for more efficient use of those sites.</u></p>	<p>In addition to the current policies, a new policy regarding the intensification opportunities provided by larger sites should be included in the District Plan.</p> <p>The Enabling Housing Act is not limited to residential zones and councils are required to ensure district plans provide for intensification in urban non-residential zones. The RVA considers policy support for retirement villages in the non-residential zones is required.</p>
S64.15	All Commercial Zones -Policies	Support and seek amendment	<p>Seek a new policy is added in all commercial zones as follows - <u>Density standards: Enable the density standards to be utilised as a baseline for the assessment of the effects of development.</u></p>	The Enabling Housing Act is not limited to residential zones and councils are required to ensure district plans provide for intensification in urban non-residential zones. The RVA considers policy support for retirement villages in the non-residential zones is required.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>The City Centre Zone should provide for retirement village activities as a permitted activity with the construction of the retirement village being a restricted discretionary activity. Their construction should have their own set of focused matters of discretion (so to provide for and acknowledge the differences that they have from other residential activities). Seek that a retirement village should be precluded from public notification in all cases, and where it is compliant with the relevant standards should also be precluded from limited notification.</p>
S64.16	All Zones - Policies	Support and seek amendment	<p>Seek a new policy is included in all zones, as follows: <u>Provision of housing for an ageing Population:</u></p> <ol style="list-style-type: none"> <u>1. Provide for a diverse range of housing and care options that are suitable for the particular needs and characteristics of older persons in Medium Density Residential Areas, such as retirement villages.</u> <u>2. Recognise the functional and operational needs of retirement villages, including that they:</u> <ol style="list-style-type: none"> <u>a. May require greater density than the planned urban built character to enable efficient provision of services.</u> <u>b. Have a unique layout and internal amenity needs to cater for the requirements of residents as they age.</u> <p>Delete or amend other Commercial Zone objectives and policies for consistency.</p>	<p>In addition to the current policies for the Residential Zones, a policy to provide for and acknowledge the following should be integrated into the District Plan:</p> <ul style="list-style-type: none"> - The diverse range of housing and care options that are suitable for the particular needs and characteristics of older persons; and - The functional and operational needs of retirement villages. <p>The Enabling Housing Act is not limited to residential zones and councils are required to ensure district plans provide for intensification in urban non-residential zones. Policy support for retirement villages in the Neighbourhood Centre Zone is required.</p> <p>The City Centre Zone should provide for retirement village activities as a permitted activity with the construction of the retirement village being a restricted discretionary activity. Their construction should have their own set of focused matters of discretion (so to provide for and acknowledge the differences that they have from other residential activities). Seek that a retirement village should be precluded from public notification in all cases, and where it is compliant with the relevant standards should also be precluded from limited notification.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S64.17	GRZ-P11, HRZ-P8, NCZ-P8, LCZ-P8, MUZ-P8, TCZ-P8, CCZ-P8 - Policies	Support and seek amendment	Amend GRZ-P11, HRZ-P8, NCZ-P8, LCZ-P8, MUZ-P8, TCZ-P8, and CCZ-P8 - Policies, as follows: New buildings and development are <u>encouraged to</u> will be designed to achieve hydraulic neutrality.	The achievement of hydraulic neutrality in should be encouraged rather than required, noting that in some instances there may be sufficient capacity in the downstream system and / or the effects of increased water flows can be managed effectively.
S64.18	NCZ-O4, LCZ-O4, MUZ-O4, TCZ-O4, CCZ-O4 - Objectives	Support and seek amendment	Amend NCZ-O4, LCZ-O4, MUZ-O4, TCZ-O4, and CCZ-O4 so that hydraulic neutrality is not required (but encouraged) where there is sufficient capacity in the downstream system and / or the effects of increased water flows can be managed effectively.	The achievement of hydraulic neutrality should be encouraged rather than required, noting that in some instances there may be sufficient capacity in the downstream system and / or the effects of increased water flows can be managed effectively.
S64.19	GRZ and HRZ - Policies	Support and seek amendment	Seek a new policy is added in the GRZ and HRZ zones as follows: <u>Changing communities: To provide for the diverse and changing residential needs of communities, recognise that the existing character and amenity of the residential zones will change over time to enable a variety of housing types with a mix of densities.</u>	A policy is required that recognises the diverse and changing residential needs of communities, and that the existing character and amenity of the residential zones will change over time to enable a variety of housing types with a mix of densities.
S64.20	GRZ - General Residential Zone – ‘Background’ MDRS	Support and seek amendment	Seek the following changes to the General Residential Zone background text: - Expressly exclude retirement villages from the applicability of the Medium and High Density Design Guide; and - Specifically acknowledge that retirement villages and / or accommodation for the ageing population is anticipated /	Support the integration of acknowledgement that the character, densities and style of residential development will develop and change over time in response to the diverse and changing needs of the community and future generations. Considers the Medium and High Density Design Guide to all residential development is not appropriate for retirement villages and reference to the Design Guide should be removed or amended to expressly exclude retirement villages, which can be ‘well designed’ without being consistent with the design guidelines.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			provided for in the General Residential Zone.	Oppose the encouragement for new development to make a 'positive contribution'. It is unclear what this would entail, and a well-functioning urban environment already covers positive matters. Considers that specific acknowledgement of retirement villages is required in the introductory text given the important role retirement villages have.
S64.21	GRZ-O1	Oppose	Delete GRZ-O1 or amend for consistency with the MDRS.	Oppose GRZ-O1, which covers matters addressed by the MDRS policies and unnecessarily introduces new, undefined concepts such as "acknowledging" the physical character of residential areas. It is unclear how a 'high quality residential environment' differs from a 'well-functioning urban environment.'
S64.22	GRZ-O2	Support	Retain GRZ-O2 as written.	Support GRZ-O2 as it aligns with Objective 1 of the MDRS.
S64.23	GRZ-O3	Support	Retain GRZ-O3 as notified.	Supports GRZ-O3 as it aligns with Objective 2 of the MDRS.
S64.24	GRZ-P1A	Support	Retain GRZ-P1A as notified.	Support GRZ-P1A as it aligns with Policy 1 of the MDRS.
S64.25	GRZ-P1B	Support	Retain GRZ-P1B as notified.	Support GRZ-P1B as it aligns with Policy 2 of the MDRS.
S64.26	GRZ-P1C	Support	Retain GRZ-P1C as notified.	Support GRZ-P1C as it aligns with Policy 3 of the MDRS.
S64.27	GRZ-P1D	Support	Retain GRZ-P1D as notified.	Support GRZ-P1D as it aligns with Policy 4 of the MDRS.
S64.28	GRZ-P1E	Support	Retain GRZ-P1E as notified.	Support GRZ-P1E as it aligns with Policy 5 of the MDRS.
S64.29	GRZ-P1	Support and seek amendment	Amend GRZ-P1 as follows: To provide for a range of building densities within the residential areas that <u>respond to</u> are compatible in form and scale with the neighbourhood's planned built form and character which takes into account the capacity of the infrastructure.	Support GRZ-P1 as it provides for a range of building densities. Seek to amend GRZ-P1 to ensure it aligns with Objective 2 of the MDRS. Oppose the linkage between building density and infrastructure capacity as infrastructure challenges can be overcome through innovative design and in some cases local works. It is not necessary to control density as a proxy for managing infrastructure constraints.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S64.30	GRZ-P2	Support and seek amendment	Amend GRZ-P2 as follows: To ensure that the scale, appearance and siting of buildings, structures and activities respond to are compatible in form and scale with the neighbourhood's planned built form and character.	Support the intention of GRZ-P2 but suggest an amendment to align with Objective 2 of the MDRS.
S64.31	GRZ-P4	Oppose	Delete GRZ-P4.	Considers the amendment to GRZ-P4 is insufficient to avoid conflict with the MDRS. This policy continues to refer to existing residential amenity and is therefore inconsistent with the expectation for significant change that may detract from amenity values.
S64.32	GRZ-P5	Oppose	Delete GRZ-P5.	Oppose GRZ-P5 as the reference to a 'pleasant and coherent' residential appearance is vague and subjective. It is also not necessarily given GRZ-P1C addresses attractive streets.
S64.33	GRZ-P9	Support and seek amendment	Amend GRZ-P9 as follows: To promote high-quality residential development with a high level of amenity and ensure that it has adequate access to infrastructural requirements, while recognising that amenity values develop and change over time.	Supports the intention of the amendment to GRZ-P9 to recognise that amenity values may change over time to reflect the neighbourhood's planned built form but suggests the reference to a 'high level of amenity' is unclear and inconsistent with the MDRS.
S64.34	General Residential Zones - Policies	Support and seek amendment	Seeks that a new policy is inserted as follows: <u>GRZ-Px Role of density standards</u> <u>Enable the density standards to be utilised as a baseline for the assessment of the effects of developments.</u>	In addition to the current policies for the General Residential Zone, the RVA considers that it is appropriate for the density standards to be utilised as a baseline for the assessment of the effects of developments.
S64.35	GRZ-R3	Support and seek amendment	<u>Seek that GRZ-R11 is amended as follows: (a) Council will restrict its discretion to, and may impose conditions on: ... (b) For</u>	Support rule GRZ-R3 and the construction of buildings as permitted, and the triggering of restricted discretionary activity status based on non-compliance with the relevant permitted

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>the construction of buildings associated with a retirement village, council will restrict its discretion to, and may impose conditions on: 1) The effects arising from exceeding any of the following standards: GRZ-S3, GRZ-S4, GRZ-S5, GRZ-S7, GRZ-S8, GRZ-S14, GRZ-S15 and GRZS16. 2) The effects of the retirement village on the safety of adjacent streets or public open spaces; 3) The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces; 4) The extent to which articulation, modulation and materiality addresses adverse visual dominance effects associated with building length; 5) When assessing the matters in 1 – 4, consider: a) The need to provide for efficient use of larger sites; and b) The functional and operational needs of the retirement village. 6) The positive effects of the construction, development and use of the retirement village. For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p> <p><u>Notification status: An application for resource consent for a restricted discretionary activity under this rule is precluded from being publicly notified. An application for resource consent for a restricted discretionary activity under this rule that complies with GRZ-S3, GRZ-S4,</u></p>	<p>activity standards (Rule GRZ-R11). Retirement villages typically infringe the number of residential units per site standard (GRZ-S13), and so are likely to be a restricted activity under this rule. Retirement villages should be a permitted activity in the General Residential Zone, and only the construction of a retirement village should be assessed as a restricted discretionary activity with a focussed set of matters of discretion that appropriately provide for / support the efficient use of larger sites for retirement villages, and the functional and operational needs of the retirement village. In accordance with Schedule 3A(5) of the Act, seek that a retirement village should be precluded from public notification in all cases, and where it is compliant with the relevant standards should also be precluded from limited notification.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<u>GRZ-S7 and GRZ-S8 is precluded from being limited notified.</u>	
S64.36	GRZ-R5A	Support and seek amendment	Seek to insert a new rule to provide for retirement villages as a permitted activity in the General Residential Zone <u>GRZ-X Retirement Villages PER.</u>	Support Rule GRZ-R5A and the provision for residential activities as a permitted activity. However, consider that the General Residential Zone should include a retirement village specific rule that provides for retirement village activities as a permitted activity, recognising that retirement villages provide substantial benefit including enabling older people to remain in familiar community environments for longer, and freeing up a number of local dwellings.
S64.37	GRZ-S3	Support	Retain GRZ-S3 as notified.	Support GRZ-S3 and the building coverage provisions as they reflect the building coverage standard of the MDRS.
S64.38	GRZ-S4	Support	Retain GRZ-S4 as notified.	Support GRZ-S4 and the setback provisions as they reflect the setback standards of the MDRS.
S64.39	GRZ-S5	Oppose and seek amendment	Amend GRZ-S5 as follows: ... <u>3. For retirement units, clauses 1 and 2 apply with the following modifications: a. the outdoor living space may be in whole or in part grouped cumulatively in 1 or more communally accessible location(s) and/or located directly adjacent to each retirement unit; and b. a retirement village may provide indoor living spaces in one or more communally accessible locations in lieu of up to 50% of the required outdoor living space.</u>	Acknowledge that GRZ-S5 and the outdoor living space provisions reflect the outdoor living space standard of the MDRS. However, it is considered that as a result of retirement villages providing a range of private and communal outdoor areas, amendments should be made to GRZ-S5 that enable the communal areas to count towards the amenity standard.
S64.40	GRZ-S7	Support	Retain GRZ-S7 as notified.	Supports GRZ-S7 and the building height provisions as they reflect the building height standards of the MDRS.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S64.41	GRZ-S8	Support and seek amendment	Amend GRZ-S8 as follows:c. Site boundaries where there is an existing common wall between two buildings on adjacent sites or where a common wall is proposed: <u>d. Boundaries adjoining open space and recreation zones, rural zones, commercial and mixed use zones, industrial zones and special purpose zones.</u>	Support GRZ-S8 in principle as it reflects the height in relation to boundary standards of the MDRS. However, it is considered that additional exclusions should be integrated with the standard to reflect that some developments may occur adjacent to less sensitive zones.
S64.42	GRZ-S9	Oppose and seek amendment	Amend GRZ-S9 to address reasons.	The standards should be amended to recognise that in some instances there may be sufficient capacity in the downstream system and / or the effects of increased water flows can be managed effectively without achieving hydraulic neutrality.
S64.43	GRZ-S13	Support	Retain GRZ-S13 as notified.	Support GRZ-S13 and the number of residential units per site provisions which reflect the number of residential units per site standard of the MDRS.
S64.44	GRZ-S14	Support and seek amendment	Amend GRZ-S14 as follows: <u>1. ... 10. For retirement units, clauses 1 – 9 apply with the following modification: The minimum dimensions for a required outlook space are 1 metre in depth and 1 metre in width for a principal living room and all other habitable rooms.</u>	Support GRZ-S14 and the outlook space provisions in principle which reflect the outlook space standards of the MDRS, however in a retirement village environment (that has multiple communal spaces available for residents), the standard is not directly relevant. Consider amendments should be made to GRZ-S14 to provide for outlook space requirements that are appropriate for retirement villages
S64.45	GRZ-S15	Support and seek amendment	Amend GRZ-S15 as follow: (a) Any retirement unit <u>or retirement unit facing the a public street</u> must have a minimum of 20% of the street-facing façade in glazing. This can be in the form of windows or doors.	Support GRZ-S15 and the windows to street provisions in principle which reflect the windows to street standard of the MDRS, however the standard should be amended to provide for retirement units facing the street.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S64.46	GRZ-S16	Support and seek amendment	Amend GRZ-S16 as follows: 1. A residential unit or <u>retirement unit</u> at ground floor level has a landscaped area of a minimum of 20% of a developed site with grass or plants and can include the canopy of trees regardless of the ground treatment below them. 2. The landscaped area may be located on any part of the development site and does not need to be associated with each residential unit or <u>retirement unit</u> .	Support GRZ-S16 and the landscaped area provisions in principle which reflect the landscaped area standard of the MDRS. However, the standard should be amended to provide for retirement units.
S64.47	High Density Zone - Background Text	Support	Retain background text for high density zones as notified.	Supports the provision for predominantly residential activities with high concentration and bulk of buildings in the High Density Residential Zone, which gives effect to policies 3(c) and (d) of the NPSUD.
S64.48	HRZ-O1	Support	Retain HRZ-O1 as notified.	Support HRZ-O1 as it aligns with Objective 1 of the MDRS.
S64.49	HRZ-O2	Support	Retain HRZ-O2 as notified.	Support HRZ-O2 as it aligns with Objective 2 of the MDRS.
S64.50	HRZ-O3	Oppose and seek amendment	Amend HRZ-O3 to address submission.	Consider that in some instances there may be sufficient capacity in the downstream stormwater system and / or the effects of increased water flows can be managed effectively without achieving hydraulic neutrality.
S64.51	HRZ-O4	Support	Retain HRZ-O4 as notified.	Support HRZ-O4 and the planned built urban form of the High Density Residential Zone which is greater than that of the General Residential Zone.
S64.52	HRZ-P1	Support	Retain HRZ-P1 as notified.	Support HRZ-P1 as it aligns with Policy 2 of the MDRS.
S64.53	HRZ-P2	Support	Retain HRZ-P2 as notified.	Support HRZ-P2 as it aligns with Policy 3 of the MDRS.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S64.54	HRZ-P3	Support	Retain HRZ-P3 as notified.	Support HRZ-P3 as it aligns with Policy 4 of the MDRS.
S64.55	HRZ-P4	Support	Retain HRZ-P4 as notified.	Support HRZ-P4 as it aligns with Policy 5 of the MDRS.
S64.56	HRZ-P5	Support and seek amendment	Amend HRZ-P5 as follows: To provide for a range of building densities within the residential areas that <u>respond to</u> are compatible in form and scale with the neighbourhood's planned built character.	Support the intention of HRZ-P5 to provide for a range of building densities within the High Density Residential Zone, but suggests amendments are required to align with Objective 2 of the MDRS.
S64.57	HRZ-P6	Oppose	Seek that retirement villages are expressly excluded from having to apply Council's Medium and High Density Design Guide.	Opposes HRZ-P6. The Medium and High Density Design Guide makes no specific reference to retirement villages, and there is no guidance as to why the requirements that are applicable to non-retirement village activities apply in the same manner to retirement villages (despite retirement villages being a unique activity with substantially differing functional and operational needs).
S64.58	HRZ-P7	Support	Retain HRZ-P7 as notified.	Support HRZ-P7 and it enabling of residential building heights up to 26 metres.
S64.59	HRZ-R1	Support and seek amendment	Amend as shown below: Where: a. Compliance is achieved with all permitted activity rules and standards that apply to the General Residential Zone <u>(excluding building height, height in relation to boundary, and building coverage)</u> .	Support Rule HRZ-R1 and the applicability of the provisions in the High Density Residential Zone unless otherwise stated, but an amendment to HRZ-R1(1) is required to clarify that the building height, height in relation to boundary and building coverage standards are excluded. Seek that retirement villages are provided for as a permitted activity in the General Residential Zone, meaning they would therefore provide for as a permitted activity under Rule HRZ-R1 in the High Density Residential Zone.
S64.60	HRZ-R2	Support and seek amendment	Amend HRZ-R2 is as follows: <u>3. Activity status: Restricted discretionary</u> Where: a) <u>Compliance is not achieved with one or</u>	Support Rule HRZ-R2 in general. However, retirement villages will typically infringe the number of residential units per site standard in the GRZ, meaning the construction of retirement

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>more of the standards under HRZ-R2.1.a, and the activity is for the construction of buildings associated with a retirement village.</u></p> <p><u>Matters of discretion are restricted to:</u></p> <p><u>(1) The effects arising from exceeding any of the following High Density Residential Zone standards: HRZ-S2, HRZ-S3 and HRZ-S4.</u></p> <p><u>(2) The effects arising from exceeding any of the following General Residential Zone standards: GRZ-S4, GRZ-S5, GRZ-S14, GRZ-S15 and GRZ-S16.</u></p> <p><u>(3) The effects of the retirement village on the safety of adjacent streets or public open spaces;</u></p> <p><u>(4) The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces;</u></p> <p><u>(5) The extent to which articulation, modulation and materiality addresses adverse visual dominance effects associated with building length;</u></p> <p><u>(6) When assessing the matters in 1 – 4, consider: (a) The need to provide for efficient use of larger sites; and (b) The functional and operational needs of the retirement village.</u></p> <p><u>(7) The positive effects of the construction, development and use of the retirement village.</u></p>	<p>villages are likely to be a restricted activity under this rule. The construction of retirement villages should be a permitted activity in the high density residential zone and only the construction should be assessed as a restricted discretionary activity against a focused set of matters of discretion which appropriately provide for / support the efficient use of larger sites for retirement villages and their functional and operational needs (which differ from other residential activities). In accordance with Schedule 3A(5) of the Act, seek that a retirement village should be precluded from public notification in all cases, and where it is compliant with the relevant standards should also be precluded from limited notification.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p> <p><u>Notification status: An application for resource consent for a restricted discretionary activity under this rule is precluded from being publicly notified. An application for resource consent for a restricted discretionary activity under this rule that complies with HRZ-S2, HRZ-S3, HRZ-S4 and GRZ-S4 is precluded from being limited notified.</u></p>	
S64.61	HRZ-S2	Support and seek amendment	<p>Amend HRZ-S2 the matters of discretion for HRZ-S2 to exclude retirement villages as follows:</p> <p>...</p> <p>Matters of Discretion where Permitted Activity Standard(s) are not met</p> <p>Matters of discretion are restricted to:</p> <p>...</p> <p>6. The matters contained in the Medium and High Density Design Guide in Appendix 1.</p> <p><u>7. For retirement villages, the matters of discretion under HRZ-R2(3)(a)(1)-(7) apply.</u></p>	<p>Support HRZ-S2 and the building height provisions. However, not all of the matters of discretion under HRZ-S2 are appropriate for all activities, such as the requirement for retirement villages to consider the matters contained in the Medium and High Density Design Guide (as discussed above in response to UFD-P1). Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out under the response to HRZ-R2 above.</p>
S64.62	HRZ-S3	Support and seek amendment	<p>Amend to exclude retirement villages as follows: (5). HRZ-S3 Height in relation to boundary ... Matters of Discretion where Permitted Activity Standard(s) are not met</p> <p>(a) Matters of discretion are restricted to: ... <u>5. (b) For retirement villages, the</u></p>	<p>Support HRZ-S3, however, not all of the matters of discretion under HRZ-S3 are appropriate for all activities, such as the requirement for retirement villages to consider the matters contained in the Medium and High Density Design Guide (as discussed above in response to UFD-P1). Seek that only the focused matters of discretion for retirement villages apply</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<u>matters of discretion under HRZ-R2(3)(a)(1)-(7) apply.</u>	where the permitted activity standard is not met, as set out under the response to HRZ-R2 above.
S64.63	HRZ-S4	Support and seek amendment	Amend the matters of discretion for HRZ-S4 to exclude retirement villages as follows... Matters of Discretion where Permitted Activity Standard(s) are not met (a) Matters of discretion are restricted to:5. The matters contained in the Medium and High Density Design Guide in Appendix 1. (b) For retirement villages, the matters of discretion <u>under HRZ-R2(3)(a)(1)-(7) apply.</u>	Support HRZ-S4 and the building coverage provisions. However, not all of the matters of discretion under HRZ-S4 are appropriate for all activities, such as the requirement for retirement villages to consider the matters contained in the Medium and High Density Design Guide (as discussed above in response to UFD-P1). Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out under the response to HRZ-R2 above.
S64.64	HRZ-S5	Support and seek amendment	Amend the matters of discretion for HRZ-S5 to exclude retirement villages as follows... Matters of Discretion where Permitted Activity Standard(s) are not met (a) Matters of discretion are restricted to:5. The matters contained in the Medium and High Density Design Guide in Appendix 1. (b) <u>For retirement villages, the matters of discretion under HRZ-R2(3)(a)(1)-(7) apply.</u>	Support HRZ-S5 and the number of residential units per site provisions. However, not all of the matters of discretion under HRZ-S4 are appropriate for all activities, such as the requirement for retirement villages to consider the matters contained in the Medium and High Density Design Guide (as discussed above in response to UFD-P1). Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out under the response to HRZ-R2 above.
S64.65	HRZ-R8	Support and seek amendment	Amend the matters of discretion for HRZ-R8 to exclude retirement villages as follows... Matters of Discretion where Permitted Activity Standard(s) are not met (a) Matters of discretion are restricted to:6. The matters contained in the Medium and High Density Design Guide in Appendix 1.	Support HRZ-R8 and buildings that exceed 20 metres in height being a restricted discretionary activity. However, not all of the matters of discretion under HRZ-S4 are appropriate for all activities, such as the requirement for retirement villages to consider the matters contained in the Medium and High Density Design Guide (as discussed above in response to UFD-P1). Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out under the response to HRZ-R2 above.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			(b) For retirement villages, the matters of <u>discretion under HRZ-R2(3)(a)(1)-(7) apply.</u>	
S64.66	NCZ - Neighbourhood Centre Zone	Support and seek amendment	Amended Neighbourhood Centre introduction as follows: NCZ – Neighbourhood Centre Zone The Neighbourhood Centre Zone provides for a range of small scale commercial activities that service the day-to-day needs of the immediate residential neighbourhood. Neighbourhood Centres accommodate a range of commercial, retail, and community services, and <u>residential activities</u> , and provide a limited range of services, and employment and living opportunities Residential activities units are located either above the ground floor <u>or towards the rear of the site or at ground floor where appropriate.</u>	Support the acknowledgement for the provision of living opportunities within the Neighbourhood Centre Zone. However, as the Enabling Housing Act is not limited to residential zones and requires councils to ensure district plans provide for the intensification of urban non-residential zones. Seek that residential activities are provided for at a level that is not 'limited', residential activities (not just residential units) are enabled, and residential activities at ground floor can be considered when appropriate.
S64.67	NCZ-O1	Support	Retain NCZ-O1 as notified.	Support NCZ-O1.
S64.68	NCZ-O2	Support and seek amendment	Amend NCZ-O2 as follows: Built development in the Neighbourhood Centre Zone is of medium density and reflects <u>responds</u> to the anticipated built character of the surrounding residential neighbourhood. It is well-designed and contributes positively to the residential environment.	Support the recognition in NCZ-O2 that the built development of the Neighbourhood Centre Zone is of medium density and reflects the built character of the surrounding residential neighbourhood, however it suggests the wording should be amended to reflect the MDRS as drafted in the Enabling Housing Act. Reference to built development being 'well-designed' and 'contributing positively' introduces undefined concepts and it is not clear whether these concepts are additional requirements to a 'well-functioning' urban environment or what they would entail.

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S64.69	NCZ-P2	Oppose and seek amendment	Amend NCZ-P2 as follows: NCZ-P2 Residential Activity Provide for residential activity where: 1. The residential units or retirement units are located either above ground floor or to the rear of a commercial activity, <u>or above ground floor where appropriate...</u>	Support NCZ-P2 in principle and the provision for residential activities, however, oppose limitations on ground level residential activities. Consider that such requirements need to be determined on a case-by-case basis, with consideration given to individual site characteristics and environments and seek that retirement units to also be provided for in NCZ-P2.
S64.70	NCZ-P4	Oppose and seek amendment	Amend NCZ-P4 to clarify that activities covered by NCZ-P2 are compatible.	Oppose NCZ-P4, as it is unclear what activities are “incompatible” with the Zone.
S64.71	NCZ-R1	Support and seek amendment	Seek that NCZ-R1 is amended as follows <u>4..... Activity status: Restricted discretionary Where: b) Compliance is not achieved with NCZ-R1-1.a or NCZ-R1-1.b, or compliance is not achieved with NCZ-R1-1.c, and the activity is for the construction of buildings for a retirement village. Matters of discretion are restricted to: (1) The effects arising from exceeding any of the following standards: NCZ-S1, NCZ-S2, NCZ-S3 and NCZ-S7. (2) The effects of the retirement village on the safety of adjacent streets or public open spaces; (3) The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces; (4) When assessing the matters in 1 – 3, consider: (a) The need to provide for efficient use of larger sites; and (b) The functional and operational needs of the retirement village. (5) The positive effects of the construction, development and use of the</u>	Support NCZ-R1 in general. However, retirement villages will typically infringe the gross floor area standards and may infringe the location of residential units standard and so are likely to be a restricted activity under this rule. Retirement villages as an activity should be a permitted activity and only the construction of a retirement village should be assessed as a restricted discretionary activity with bespoke matters of discretion to provide for the differences of retirement villages compared to other residential activity. The matters of discretion for retirement villages need to appropriately provide for / support the efficient use of larger sites for retirement villages, and the functional and operational needs. Only these matters of discretion should apply to the construction of retirement villages, not the matters of discretion currently set out under NCZ-S1, NCZ-S2, NCZ-S3 and NCZ-S7. In accordance with Schedule 3A(5) of the Act, seek that a retirement village should be precluded from public notification in all cases, and where it is compliant with the relevant standards should also be precluded from limited notification.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>retirement village. For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village. Notification status: An application for resource consent for a restricted discretionary activity under this rule is precluded from being publicly notified. An application for resource consent for a restricted discretionary activity under this rule that complies with NCZ-S1, NCZ-S2 and NCZ-S3 is precluded from being limited notified.</u></p>	
S64.72	NCZ-R18	Oppose and seek amendment	Amend NCZ-R18 as follows: NCZ-R18 Retirement Village 1. Activity status: <u>Discretionary Permitted</u>	Support the inclusion of a retirement village specific rule NCZ-R18, however considers that discretionary activity status is not appropriate in this zone, The zone should provide for retirement village activities as a permitted activity (with the construction of the retirement village being a restricted discretionary activity), recognising that retirement villages provide substantial benefits including enabling older people to remain in familiar community environments for longer and freeing up a number of dwellings located in surrounding suburbs.
S64.73	NCZ-S1	Support and seek amendment	Amend NCZ-S1 to exclude retirement villages from the matters of discretion.	Support NCZ-S1 in general but seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out under our response to NCZ-R2.
S64.74	NCZ-S2	Support and seek amendment	<p>Amend standard NCZ-S2 to exclude retirement villages from the matters of discretion.</p> <p>Amend standard NCZ-S2 as follows: Where the side or rear boundary of a site</p>	Support NCZ-S2 in principle as it largely reflects the height in relation to boundary standards of the MDRS. However, the Open Space and Recreation Zone should also be excluded from the standard (as it is a less sensitive zone), with the height in relation to boundary standards only applying where a site adjoins a Residential Zone. The RVA seeks that only the focused

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			adjoins a Residential Zone or Open Space and Recreation Zone the following Height in Relation to Boundary standard applies: ...	matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out in our response to NCZ-R2.
S64.75	NCZ-S4	Oppose and seek amendment	Amend standard NCZ-S4 to exclude retirement villages for the matters of discretion.	Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out under the response to NCZ-R2 above.
S64.76	NCZ-S5	Oppose and seek amendment	Amend NCZ-S5 to remove restrictions on ground level residential activities and provide for consideration of ground level residential activities on a case-by-case basis, and to provide for retirement units. NCZ-S5 Location of Residential Units 1. All residential units <u>and / or retirement units</u> must be located above ground floor level..... a. No part of the residential unit <u>and / or retirement unit</u> fronts onto a public open space, including roads; and b. They do not interrupt or prevent an active frontage as required by NCZ-S4; and c. <u>When taking into account individual site characteristics and environments residential units and / or retirement units may be appropriate on the ground floor.</u> Also amend standard to exclude retirement villages from the matters of discretion.	Oppose limitations on ground level residential activities. Such requirements need to be determined on a case-by-case basis, with consideration given to individual site characteristics and environments. NCZ-S5 should refer to retirement units as well as residential units. Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out in our response to NCZ-R2.
S64.77	NCZ-S7	Support and seek amendment	Amend NCZ-S7 as follows:... <u>4. For retirement units, clauses 1 and 2 apply with the following modifications: a) the outdoor living space may be in whole or in part grouped cumulatively in 1 or more</u>	The NCZ-S7 and the outdoor living space provisions reflect the outdoor living space standards of the MDRS (with additional standards related to multi-unit housing). However, as a result of retirement villages providing a range of private and communal outdoor areas, amendments should be made to NCZ-S7 that

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>communally accessible location(s) and/or located directly adjacent to each retirement unit; and b) a retirement village may provide indoor living spaces in one or more communally accessible locations in lieu of up to 50% of the required outdoor living space.</u></p> <p>Also amend standard to exclude retirement villages from the matters of discretion.</p>	enable the communal areas of retirement villages to count towards the amenity standard. Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out in our response to NCZ-R2.
S64.78	LCZ - Local Centre Zone - Introduction	Support and seek amendment	Seek to provide for residential activities (including retirement villages) at the ground floor level if site characteristics / environmental circumstance is deemed to be appropriate (i.e. to be determined on a case-by-case basis).	Seek amendments to the Local Centres Zone Introduction. Support the provision for residential opportunities / activities in the zone and the recognition provided for the anticipated change and intensification of the scale and density of buildings over time., however, residential activities should not be limited to being located above ground floor on identified street frontages.
S64.79	NCZ-O1	Support	Retain NCZ-O1 as notified.	Support LCZ-O1 and the provision for residential activities in the Local Centre Zone.
S64.80	LCZ-O2	Support and seek amendment	Amend LCZ-O2 as follows: Local Centres are <u>well-functioning safe and attractive</u> urban environments. The built environment is of a scale	Support the intention of LCZ-O2 but suggests amendments are necessary to reflect Policy 1 of the NPSUD. It is not clear how a 'safe and attractive' urban environment is different from a 'well-functioning' urban environment as set out under the NPSUD.
S64.81	LCZ-P2	Oppose and seek amendment	The RVA seeks to amend LCZ-P2 to remove restrictions on ground level residential activities, and to provide for retirement units: LCZ-P2 Residential activity Provide for residential activity and development where:	Support LCZ-P2 in principle and the provision for residential activities, however, oppose limitations on ground level residential activities, and requirements need to be determined on a case-by-case basis, with consideration given to individual site characteristics and environments. Seek for retirement units to also be provided for in LCZ-P2.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			1) The residential units <u>or retirement units</u> are located above ground floor, where located along an active frontage identified on the planning maps, <u>or above ground floor where appropriate...</u>	
S64.82	LCZ-P4	Oppose and seek amendment	Amend LCZ-P4 to clarify that activities covered by LCZ-P2 are compatible.	Oppose LCZ-P4, as it is unclear what activities are “incompatible” with the Zone.
S64.83	LCZ-P5(4)	Support and seek amendment	Amend LCZ-P5(4) as follows: Provide for medium-density development that ... 4. is well designed and contributes to an <u>attractive a well-functioning</u> urban environment.	Supports LCZ-P5 and its provision for medium to high density development but oppose the requirement for development that contributes to an ‘attractive urban environment’. It is not clear what this term means in relation to a ‘well-functioning urban environment’ and whether or not it adds additional requirements.
S64.84	LCZ-R1	Support and seek amendment	Amend LCZ-R1 as follows: ... <u>5. Activity status: Restricted discretionary Where: c) Compliance is not achieved with LCZ-R1-1.a or LCZ-R1-1.b, or compliance is not achieved with one or more of the standards under LCZ-R1-1.c, and the activity is for the construction of buildings for a retirement village. Matters of discretion are restricted to: (1) The effects arising from exceeding any of the following standards: LCZ-S1, LCZ-S2, LCZ-S3 and LCZ-S7. (2) The effects of the retirement village on the safety of adjacent streets or public open spaces; (3) The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces; (4) When assessing the matters in</u>	Support LCZ-R1 in general, however, retirement villages will typically infringe the gross floor area standards and may infringe the location of residential units standards, therefore the construction of retirement villages are likely to be a restricted activity under this rule. The construction of retirement villages should have a bespoke set of matters of discretion (to provide for and acknowledge the differences they have from other residential activities). Retirement villages as an activity should be a permitted activity in this zone and only the construction should be assessed as a restricted discretionary activity. The matters of discretion need to appropriately provide for / support the efficient use of larger sites for retirement villages, and their functional and operational needs. Only these matters of discretion should apply to the construction of retirement villages, not the matters of discretion under LCZ-S1, LCZ-S2, LCZ-S3 and LCZ-S7. In accordance with Schedule 3A(5) of the Act, a retirement village should be precluded from public notification

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>1 – 3, consider: (a) The need to provide for efficient use of larger sites; and (b) The functional and operational needs of the retirement village. (5) The positive effects of the construction, development and use of the retirement village. For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village. Notification status: An application for resource consent for a restricted discretionary activity under this rule is precluded from being publicly notified. An application for resource consent for a restricted discretionary activity under this rule that complies with LCZ-S1, LCZ-S2 and LCZ-S3 is precluded from being limited notified.</u></p>	<p>in all cases, and where it is compliant with the relevant standards should also be precluded from limited notification.</p>
S64.85	LCZ-R19	Oppose and seek amendment	<p>Amend LCZ-R19 as follows: LCZ-R19 Retirement Village 1. Activity status: Discretionary <u>Permitted</u>.</p>	<p>Support the inclusion of a retirement village specific rule LCZ-R19, however discretionary activity status is not appropriate in this Zone. The Local Centre Zone should provide for retirement village activities as a permitted activity (with the construction of the retirement village being a restricted discretionary activity), recognising that retirement villages provide substantial benefits including enabling older people to remain in familiar community environments for longer and freeing up a number of dwellings located in surrounding suburbs.</p>
S64.86	LCZ-S1	Support and seek amendment	<p>Amend standard LCZ-S1 to exclude retirement villages from the matters of discretion.</p>	<p>Support LCZ-S1 enables greater building heights as required under the NPSUD. Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out in our response to LCZ-R1 above.</p>

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S64.87	LCZ-S2	Support and seek amendment	Amend LCZ-S2 as follows: Where the side or rear boundary of a site adjoins a Residential Zone or Open Space and Recreation Zone the following Height in Relation to Boundary standard applies: Also amend standard to exclude retirement villages from the matters of discretion.	64.94 Support LCZ-S2 in principle as it largely reflects the height in relation to boundary standards of the MDRS However, the Open Space and Recreation Zone should also be excluded from the standard (as it is a less sensitive zone), with the height in relation to boundary standards only applying where a site adjoins a Residential Zone. Also seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as per our response to LCZ-R1 above.
S64.88	LCZ-S3	Support and seek amendment	Amend standard LCZ-S3 to exclude retirement villages from the matters of discretion.	Support LCZ-S3 as they reflect the side and rear setback standards of the MDRS. Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out under our response to LCZ-R1.
S64.89	LCZ-S4	Support and seek amendment	Amend standard LCZ-S4 to exclude retirement villages from the matters of discretion.	Seeks that for standards LCZ-S4 only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out in our response to LCZ-R1.
S64.90	LCZ-S5	Oppose and seek amendment	Amend LCZ-S5 as follows: 1. Along active frontages identified on the planning maps all residential units <u>and / or retirement units</u> must be located above ground floor level, <u>except that residential units and / or retirement units may be located on the ground floor where:</u> a. <u>When taking into account individual site characteristics and environments residential units and / or retirement units may be appropriate on the ground floor.</u> Also amend standard to exclude retirement villages from the matters of discretion.	Oppose limitations on ground level residential activities in rule LCZ-S5 and consider that such requirements need to be determined on a case-by case basis, with consideration given to individual site characteristics and environments. LCZ-S5 should refer to retirement units as well as residential units. Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out under our response to LCZ-R1.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S64.91	LCZ-S7	Support and seek amendment	Amend LCZ-S7 as follows to..... <u>5. For retirement units, clauses 1 and 2 apply with the following modifications: a) the outdoor living space may be in whole or in part grouped cumulatively in 1 or more communally accessible location(s) and/or located directly adjacent to each retirement unit; and b) a retirement village may provide indoor living spaces in one or more communally accessible locations in lieu of up to 50% of the required outdoor living space.</u> Also amend standard to exclude retirement villages from the matters of discretion.	LCZ-S7 and the outdoor living space provisions reflect the outdoor living space standards of the MDRS, however, as a result of retirement villages providing a range of private and communal outdoor areas, amendments should be made to LCZ-S7 that enable the communal areas to count towards the amenity standard. Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out under our response to LCZ-R1.
S64.92	MUZ - Mixed Use Zone - Introduction	Support and seek amendment	Seek that the Mixed Use Zone introduction is amended to remove the limitation of the provision of residential activities to above commercial activities, and to include retirement villages in the list of activities that are enabled in the Mixed Use Zone. Seek a definition of definition of a 'well-functioning urban environment' as provided under the NPSUD to covers these matters.	Support the provision for residential opportunities / activities in the Mixed Use Zone, however residential activities should not be limited to being located "over" commercial activities, and specific mention should be given to the enabling of residential activities such as retirement villages. The Introduction could be amended to align better with the direction in the NPSUD. It is also unclear what a 'safe, vibrant, and attractive' environment means.
S64.93	MUZ-O1	Support and seek amendment	Amend MUZ-O1 so that "compatible" applies to light industrial activities only and not to residential activities.	Support MUZ-O1 and the provision for residential activities in the Mixed Use Zone, however, oppose the qualifier "compatible" applying to residential activities.
S64.94	MUZ-O2	Support and seek amendment	Amend MUZ-O2 as follows: Mixed Use Zones are <u>well-functioning vibrant,</u>	Support the intention of MUZ-O2 to recognise that the built development of the Mixed Use Zone is generally of a medium to

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			attractive and safe urban environments. The built environment is well-designed, reflects the wide mix of activities and is generally of a medium to high scale and density.	high scale and density. However, it suggests that it MUZ-O2 should be amended to refer to a 'well-functioning' urban environment.
S64.95	MUZ-P2	Support and seek amendment	Amend MUZ-P2 as follows: Provide for residential activity where any residential units <u>or retirement units</u> are designed to: <ol style="list-style-type: none"> 1. Achieve adequate indoor noise and ventilation levels for occupants; 2. Provide a high level of amenity for occupants; and 3. Minimise reverse sensitivity effects on non-residential activities. 	Supports MUZ-P2 in principle and the provision for residential activities but seek for retirement units to also be provided for in MUZ-P2.
S64.96	MUZ-P4	Oppose and seek amendment	Amend MUZ-P4 to clarify that activities covered by LCZ-P2 are compatible.	The RVA opposes MUZ-P4, as it is unclear what activities are "incompatible" with the Zone.
S64.97	MUZ-P5	Oppose and seek amendment	Amend MUZ-P5 as follows:..... <ol style="list-style-type: none"> 3. <u>contributes to a well-functioning urban environment.</u> 3. Is well designed; and 4. Contributes to an attractive and safe urban environment. 	Amendments are required to MUZ-P5 to reflect the wording of the NPSUD more accurately. Oppose the requirement for development that contributes to an 'attractive and safe urban environment' and is 'well-designed'. It is not clear what this term means in relation to a 'well-functioning urban environment' and whether or not it adds additional requirements.
S64.98	MUZ-R1	Support and seek amendment	Amend MUZ-R1 as follows: ... <ol style="list-style-type: none"> 3. <u>Activity status: Restricted discretionary</u> <u>Where:</u> <ol style="list-style-type: none"> a) <u>Compliance is not achieved with one or more of the standards under MUZ-R1-1.a, and the activity is for the construction of buildings associated with a retirement</u> 	Support MUZ-R1 in general, however, where the construction of a retirement village is a restricted discretionary activity, they should have their own set of focused matters of discretion (so to provide for and acknowledge them from other residential activities). As noted in our response to MUZ-R17 retirement villages as an activity should be a permitted activity in the Mixed Use Zone, and only the construction of a retirement village assessed as a restricted discretionary activity. The matters of

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p><u>village. Matters of discretion are restricted to:</u></p> <p><u>(1) The effects arising from exceeding any of the following standards: MUZ-S1, MUZ-S2, MUZ-S3 or MUZ-S5;</u></p> <p><u>(2) The effects of the retirement village on the safety of adjacent streets or public open spaces;</u></p> <p><u>(3) The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces;</u></p> <p><u>(4) When assessing the matters in 1 – 3, consider:</u></p> <p><u>(a) The need to provide for efficient use of larger sites; and</u></p> <p><u>(b) The functional and operational needs of the retirement village.</u></p> <p><u>(5) The positive effects of the construction, development and use of the retirement village.</u></p> <p><u>For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p> <p><u>Notification status: An application for resource consent for a restricted discretionary activity under this rule is precluded from being publicly notified. An application for resource consent for a restricted discretionary activity under this rule that complies with MUZ-S1, MUZ-S2 and MUZ-S3 is precluded from being limited notified.</u></p>	<p>discretion applicable to retirement villages need to appropriately provide for / support the efficient use of larger sites for retirement villages, and their functional and operational needs. Only these matters of discretion should apply to the construction of retirement villages, not the matters of discretion currently set out under MUZ-S1, MUZ-S2, MUZ-S3 and MUZ-S7. In accordance with Schedule 3A(5) of the Act, seek that retirement village should be precluded from public notification in all cases, and where it is compliant with the relevant standards should also be precluded from limited notification.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S64.99	MUZ – Mixed Use Zone	Oppose and seek amendment	Amend the activity status of retirement villages activities to be a permitted activity in the Mixed Use Zone and subsequently delete the existing matters of discretion for retirement village activities.	Support the inclusion of a retirement village specific rule. However, the Enabling Housing Act is not limited to residential zones, with councils required to ensure district plans provide for intensification of urban non-residential zones. Therefore, the Mixed Use Zone should provide for retirement village activities as a permitted activity, with only the construction of the retirement village being a restricted discretionary activity. This permitted activity status would recognise that retirement villages provide substantial benefits including enabling older people to remain in familiar community environments and freeing up a number of dwellings located in surrounding suburbs.
S64.100	MUZ-R17	Oppose	The RVA seeks to amend the activity status of retirement villages activities to be a permitted activity in the Mixed Use Zone and subsequently delete the existing matters of discretion for retirement village activities.	The RVA supports the inclusion of a retirement village specific rule. However, enabling Housing Act is not limited to residential zones. The Mixed Use Zone should provide for retirement village activities as a permitted activity (not a restricted discretionary activity with the construction of the retirement village being a restricted discretionary activity. This would recognise that retirement villages provide substantial benefits including enabling older people to remain in familiar community environments for longer, whilst also freeing up a number of dwellings located in surrounding suburbs.
S64.101	MUZ-S1	Support and seek amendment	Amend MUZ-S1 to exclude retirement villages from the matters of discretion.	Support MUZ-S1 which enables greater building heights as required under the NPSUD. The RVA seeks that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out under our response to MUZ-R1.
S64.102	MUZ-S2	Support and seek amendment	Amend MUZ-S2 as follows: Where the side or rear boundary of a site adjoins a Residential Zone or Open Space	Support MUZ-S2 in principle as it largely reflects the height in relation to boundary standards of the MDRS. However, the Open Space and Recreation Zone should also be excluded from the standard (as it is a less sensitive zone), with the height in

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			and Recreation Zone the following Height in Relation to Boundary standard applies: ... Amend standard to exclude retirement villages from the matters of discretion.	relation to boundary standards only applying where a site adjoins a Residential Zone. Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out in our response to MUZ-R1.
S64.103	MUZ-S3	Support and seek amendment	Amend MUZ-S3 to exclude retirement villages from the matters of discretion	Support MUZ-S3 as it reflects the side and rear setback standards of the MDRS. Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out in our response to MUZ-R1.
S64.104	MUZ-S5	Support and seek amendment	Amend MUZ-S5 as follows: <u>4. For retirement units, clauses 1 and 2 apply with the following modifications:</u> <u>a) the outdoor living space may be in whole or in part grouped cumulatively in 1 or more communally accessible location(s) and/or located directly adjacent to each retirement unit; and</u> <u>b) a retirement village may provide indoor living spaces in one or more communally accessible locations in lieu of up to 50% of the required outdoor living space.</u> <u>(d) Amend standard to exclude retirement villages from the matters of discretion.</u>	MUZ-S5 reflects the outdoor living space standards of the MDRS (with additional standards related to multi-unit housing). However, as t a result of retirement villages providing a range of private and communal outdoor areas, amendments should be made that enable the communal areas to count towards the amenity standard. Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out in our response to MUZ-R1.
S64.105	TCZ – Town Centre Zone	Support and seek amendment	Seek that the Town Centre Zone Introduction is amended to provide for residential activities at the ground level where appropriate (including retirement villages).	Supports the provision for residential opportunities / activities in the Town Centre Zone, however residential activities should not be limited to being located above ground floor on identified street frontages.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S64.106	TCZ-O1	Support	Retain TCZ-O1 as notified.	Support TCZ-O1 and the provision for residential activities in the Town Centre Zone.
S64.107	TCZ-O2	Support and seek amendment	Amend TCZ-O2 as follows: The Town Centre Zone is a <u>well-functioning vibrant, attractive and safe</u> urban environment that is characterised by high-density urban development, well-designed buildings and high quality public spaces	Support the intention of TCZ-O2. However, suggest that TCZ-O2 should be amended to refer to a 'well-functioning' urban environment.
S64.108	TCZ-P2	Oppose and seek amendment	Amend TCZ-P2 to remove limitations on ground level residential activities: Provide for medium to high density residential development and activity where: 1) The residential units are located above ground floor, <u>where located along an active frontage identified on the planning maps, or at ground floor where assessed as appropriate on a case by case basis;</u> 2) It does not interrupt or preclude an attractive frontage that provides a positive interface with the public space; ...	Support TCZ-P2 in principle, however, oppose limitations on ground level residential activities.
S64.109	TCZ-P4	Oppose	Amend TCZ-P4 to clarify that activities covered by LCZ-P2 are compatible.	Oppose TCZ-P4, as it is unclear what activities are "incompatible" with the Zone.
S64.110	TCZ-P5	Oppose and seek amendment	Amend TCZ-P5 as follows:.....4. Is well designed and contributes to a well functioning an attractive urban environment; and.....	Amendments are required to TCZ-P5 to reflect the wording of the NPSUD more accurately. Oppose the requirement for development that contributes to an 'attractive and safe urban environment' and is 'well-designed'. It is not clear what this term means in relation to a 'well-functioning urban environment' and whether or not it adds additional requirements.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S64.111	TCZ-R1	Support and seek amendment	<p>Amend TCZ-R1 as follows: ... <u>3. Activity status: Restricted discretionary</u> Where: <u>d) Compliance is not achieved with LCZ-R1-1.a or LCZ-R1-1.b, or compliance is not achieved with one or more of the standards under LCZ-R1-1.c, and the activity is for the construction of buildings for a retirement village.</u> <u>Matters of discretion are restricted to: (1) The effects arising from exceeding any of the following standards: LCZ-S1, LCZ-S2, LCZ-S3 and LCZ-S7.</u> <u>(2) The effects of the retirement village on the safety of adjacent streets or public open spaces;</u> <u>(3) The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces;</u> <u>(4) When assessing the matters in 1 – 3, consider:</u> <u>(a) The need to provide for efficient use of larger sites; and (b) The functional and operational needs of the retirement village.</u> <u>(5) The positive effects of the construction, development and use of the retirement village.</u> For clarity, <u>no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village.</u></p>	<p>Supports TCZ-R1 in general but where the construction of a retirement village is a restricted discretionary activity, they should have their own set of focused matters of discretion (so to provide for and acknowledge the differences they have from other residential activities). Only these matters of discretion should apply to the construction of retirement villages, not the matters of discretion currently set out under TCZ-S1, TCZ-S2, TCZ-S3 and TCZ-S7. As noted in our response to TCZ-R19 villages as an activity should be a permitted activity in the Town Centre Zone, and only the construction of a retirement village assessed as a restricted discretionary activity, and the matters of discretion applicable to retirement villages need to appropriately provide for / support the efficient use of larger sites for retirement villages, and their functional and operational needs. In accordance with Schedule 3A(5) of the Act seek that a retirement village should be precluded from public notification in all cases, and where it is compliant with the relevant standards should also be precluded from limited notification.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<u>Notification status: An application for resource consent for a restricted discretionary activity under this rule is precluded from being publicly notified. An application for resource consent for a restricted discretionary activity under this rule that complies with LCZ-S1, LCZ-S2 and LCZ-S3 is precluded from being limited notified.</u>	
S64.112	TCZ-R19	Oppose and seek amendment	Amend the activity status in TCZ-R19 of retirement villages to be a permitted activity in the Town Centre Zone.	Support the inclusion of a retirement village specific rule in TCZ-R19, however, discretionary activity status is not appropriate in this Zone. The Enabling Housing Act is not limited to residential zones, with councils required to ensure district plans provide for intensification of urban non-residential zones. The Town Centre Zone should provide for retirement village activities as a permitted activity (with the construction of the retirement village being a restricted discretionary activity), as retirement villages provide substantial benefits including enabling older people to remain in familiar community environments for longer and freeing up a number of dwellings located in surrounding suburbs.
S64.113	TCZ-S1	Support and seek amendment	Amend TCZ-S1 to exclude retirement villages from the matters of discretion.	Support TCZ-S1 which enables greater building heights as required under the NPSUD. Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out in our response to TCZ-R1.
S64.114	TCZ-S2	Support and seek amendment	The RVA seeks to amend TCZ-S2 as follows: Where the side or rear boundary of a site adjoins a Residential Zone or Open Space and Recreation Zone the following Height in Relation to Boundary	Support TCZ-S2 and the height in relation to boundary provisions in principle as it largely reflects the height in relation to boundary standards of the MDRS. However, the Open Space and Recreation Zone should also be excluded from the standard (as it is a less sensitive zone), with the height in relation to

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			standard applies: ... Amend standard to exclude retirement villages from the matters of discretion.	boundary standards only applying where a site adjoins a Residential Zone. Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out in our response to TCZ-R1.
S64.115	TCZ-S3	Support and seek amendment	Amend standard to exclude retirement villages from the matters of discretion.	Support TCZ-S3 as they reflect the side and rear setback standards of the MDRS (where the side of rear boundary of a site in the Town Centre Zone adjoins a Residential Zone or Open Space and Recreation Zone). Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out in our response to TCZ-R1.
S64.116	TCZ-S4	Oppose and seek amendment	Seek to amend TCZ-S4 to integrate consideration of individual site characteristics / circumstances. Amend standard to exclude retirement villages from the matters of discretion.	In regard to TCZ-S4 seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out in our response to TCZ-R1 above.
S64.117	TCZ-S5	Oppose and seek amendment	Amend TCZ-S5 as follows: 1. Along active frontages identified on the planning maps <u>encourage</u> all residential units <u>and / or retirement units</u> to be located above ground floor level, or allow residential units <u>and / or retirement units to be located on the ground floor where: a. <u>When taking into account individual site characteristics and environments residential units and / or retirement units may be appropriate on the ground floor.</u></u> Amend standard to exclude retirement villages from the matters of discretion.	In regards to rule TCZ-S5 oppose limitations on ground level residential activities, such requirements need to be determined on a case-by case basis, with consideration given to individual site characteristics and environments. The RVA considers TCZ-S5 should refer to retirement units as well as residential units. The RVA seeks that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out under the response to TCZ-R1 above.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S64.118	TCZ-S7	Support and seek amendment	<p>Amend TCZ-S7 as follows:..... 4. For <u>retirement units, clauses 1 and 2 apply with the following modifications:</u></p> <p><u>a) the outdoor living space may be in whole or in part grouped cumulatively in 1 or more communally accessible location(s) and/or located directly adjacent to each retirement unit; and</u></p> <p><u>b) a retirement village may provide indoor living spaces in one or more communally accessible locations in lieu of up to 50% of the required outdoor living space.</u></p> <p>Amend standard to exclude retirement villages from the matters of discretion</p>	<p>TCZ-S7 reflects the outdoor living space standards of the MDRS (with additional standards related to multi-unit housing). However, as a result of retirement villages providing a range of private and communal outdoor areas, amendments should be made to TCZ-S7 that enable the communal areas to count towards the amenity standard. Seek that only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out in our response to TCZ-R1 above.</p>
S64.119	CCZ – City Centre Zone	Support and seek amendment	<p>Amend City Centre Zone introduction as follows: High-density development and intensification is enabled and encouraged, <u>recognising that the urban environment, while maintaining and improving</u> including amenity values, <u>will develop and change over time in response to the diverse and changing needs of people and communities. especially in the public realm.....</u> New buildings and development are well designed and reflect the <u>well-functioning high quality</u> urban environment of the City Centre Zone.....substantial additions and alterations to existing buildings will allow for an assessment of the proposal to ensure that any new development is well designed and of a high quality <u>and consistent with the City Centre Design</u></p>	<p>Support the provision for residential opportunities / activities in the City Centre Zone, however the residential activities should not be limited to being located above ground floor along active frontages. Amendments should be made to ensure that development is not required to “improve” amenity values in the public realm, as new developments should not have to account for the effects of historic development. Amendments should be made to recognise that amenity values will change over time, in accordance with Objective 4 of the NPSUD. The reference to a ‘high quality’ urban environment must be replaced with ‘well-functioning’. Oppose requirement for new buildings to be consistent with the City Centre Design Guide, they make no reference to retirement villages (which have substantially differing functional and operational needs), and provide no guidance as to why the requirements that are applicable to non-retirement village activities apply in the same manner to retirement villages, which can be ‘well-designed’ and of a ‘high standard’ without being consistent with the design guidelines.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			Guide..... Residential units need to be located above ground floor along identified active frontages <u>unless residential activity at ground floor is appropriate assessed on a case by case basis</u>	
S64.120	CCZ-O1	Support and seek amendment	Amend CCZ-O1 as follows:...It is a <u>well-functioning</u> urban environment vibrant and attractive and accommodates a wide range of commercial, community, recreational and residential activities.	Support CCZ-O1 and the provision for residential activities in the City Centre Zone. However, it suggests that CCZ-O1 should be amended to refer to a 'well-functioning' urban environment.
S64.121	CCZ-O2	Support	Retain CCZ-O2 as notified.	Support CCZ-O2 and its recognition that the built form of the City Centre Zone reflects a high density urban environment.
S64.122	CCZ-P1	Oppose and seek amendment	Amend CCZ-P1 as follows: 1. Enable a wide range of activities that are compatible with the anticipated purpose, <u>and character and amenity values</u> of the CCZ- City Centre Zone.	Amendments are required to CCZ-P1 to better align with Policy 6 of the NPSUD.
S64.123	CCZ-P2	Oppose and seek amendment	Amend CCZ-P2 as follows: 1) Provide for high-density residential activity and development where: a) Residential units are located above ground floor, <u>unless ground floor residential activity is assessed to be appropriate on a case by case basis</u> ; b) Residential units and / or retirement units are designed to i. d) It is consistent with the City Centre Design Guide. 2) Only allow for the location of residential units <u>and / or retirement units</u>	Support CCZ-P2 in principle, however, oppose limitations on ground level residential activities. It is also not appropriate for high density residential activity and development (including retirement villages) to only be provided where it is consistent with the City Centre Design Guide. The City Centre Design Guide makes no specific reference to retirement villages (which have substantially differing functional and operational needs), with no guidance as to why the requirements that are applicable to non-retirement village activities apply in the same manner to retirement villages.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>on the ground floor where: a) It is not located along an Active Street Frontage identified on the planning maps b). It does not preclude a positive interface with the public space; c. It will not compromise amenity values for residents ... <u>f. When taking into account individual site characteristics and environments it is considered that residential units and / or retirement units are appropriate on the ground floor.</u> 4) Avoid the location of residential units on the ground floor along Active Street Frontages identified on the planning maps.</p>	
S64.124	CCZ-P4	Oppose and seek amendment	<p>Amend CCZ-P4 as follows Provide for and encourage high-density and high quality built development that: ... 6. Is consistent with the City Centre Design Guide.</p>	<p>Support provision for as much development capacity as possible which aligns with the NPSUD, however, oppose clause 6 of CCZ-P4. The City Centre Design Guide makes no specific reference to retirement villages (which have substantially differing functional and operational needs), and there is no guidance as to why the requirements that are applicable to non-retirement village activities apply in the same manner to retirement villages. Consider that retirement villages should be assessed against any built form standards they do not comply with. The City Centre Design Guide does not align with the NPSUD.</p>
S64.125	CCZ-P5	Oppose and seek amendment	<p>Amend CCZ-P5 as follows:... Where located along identified active frontages, require new built development and activities to: 2. Be consistent with the City Centre Design Guide. Avoid new built development and activities that prevent or interrupt a continuous active street frontage along identified active frontages.</p>	<p>Policy CCZ-P5. Do not consider that new built development and activities (including retirement villages) should be required to be consistent with the City Centre Design Guide. As per our response to TCZ-S4, do not consider that active frontage requirements need to be determined on a case-by-case basis with consideration given to individual site characteristics and environments. An 'avoid' requirement is contrary to the purpose of the NPSUD to enable intensification in this Zone.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<u>Encourage new built development and activities to provide a continuous active street frontage along identified active frontages, whilst considering the individual site characteristics and environment.</u>	
S64.126	CCZ-P6	Oppose	Amend CCZ-P6 to clarify that activities covered by CCZ-P2 are compatible.	Oppose CCZ-P6 as it is unclear what activities are “incompatible” with the Zone.
S64.127	Local Centre Zone	Oppose and seek amendment	<u>Amend rules to provide a permitted activity rule for retirement villages and to provide the following matters of discretion: <u>Matters of discretion are restricted to: (1) The effects arising from exceeding any of the following standards: LCZ-S1, LCZ-S2, LCZ-S3 and LCZ-S7. (2) The effects of the retirement village on the safety of adjacent streets or public open spaces; (3) The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces; (4) When assessing the matters in 1 – 3, consider: (a) The need to provide for efficient use of larger sites; and (b) The functional and operational needs of the retirement village. (5) The positive effects of the construction, development and use of the retirement village. For clarity, no other rules or matters of discretion relating to the effects of density apply to buildings for a retirement village. Notification status: An application for resource</u></u>	The City Centre Zone should provide for retirement village activities as a permitted activity with the construction of the retirement village being a restricted discretionary activity. Their construction should have their own set of focused matters of discretion (so to provide for and acknowledge the differences that they have from other residential activities). Seek that a retirement village should be precluded from public notification in all cases, and where it is compliant with the relevant standards should also be precluded from limited notification.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<u>consent for a restricted discretionary activity under this rule is precluded from being publicly notified. An application for resource consent for a restricted discretionary activity under this rule that complies with LCZ-S1, LCZ-S2 and LCZ-S3 is precluded from being limited notified.</u>	
S64.128	CCZ-S2	Support	Retain CCZ-S2 as notified.	Support CCZ-S2 and the setback provisions as they reflect the side and rear setback standards of the MDRS.
S64.129	CCZ-S3	Oppose	Seek CCZ-S3 to be amended to acknowledge that ground level residential units and / or retirement units can be provided if deemed to be appropriate when considering the individual site characteristics and environment.	Oppose limitations on ground level residential activities.
S64.130	CCZ-S4	Support and seek amendment	Amend CCZ-S4 as follows: Where the side or rear boundary of a site adjoins a High Density Residential Zone, or General Residential Zone, or Open Space and Recreation Zone , the following Height in Relation to Boundary standard applies: ...	Support CCZ-S4 in principle as it largely reflects the height in relation to boundary standards of the MDRS (where the side or rear boundary of a site in the City Centre Zone adjoins a High Density Residential Zone, General Residential Zone or Open Space and Recreation Zone). However, consider that the Open Space and Recreation Zone should also be excluded from the standard (as it is a less sensitive zone), with the height in relation to boundary standards only applying where a site adjoins a High Density Residential Zone or General Residential Zone.
S64.131	CCZ-S8	Oppose and seek amendment	Amend CCZ-S8 to integrate consideration of individual site characteristics / circumstances. Seek to also exclude retirement villages from the applicability of the City Centre Design Guide. Amend	Oppose the minimum ground floor frontage requirements (that at least 55% of the ground floor building frontage must be display windows or transparent glazing). Given the requirements of the Enabling Housing Act to provide for intensification of urban non-residential zones consider that such

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>CCZ-S8 as follows: Active Frontages Matters of discretion are restricted to: ... 4) Consistency with the City Centre Design Guide. <u>This matter of discretion does not apply to retirement villages.</u></p> <p>Also amend standard to exclude retirement villages from the matters of discretion.</p>	<p>requirements need to be determined on a case-by-case basis, with consideration given to individual site characteristics and environments. Do not consider that retirement villages should be assessed against the City Centre Design Guide. Seek to exclude retirement villages from matter of discretion (4) for CCZ-S8, with a retirement village specific set of matters of discretion in our proposed changes to Rule CCZ-R16 applying instead. Only the focused matters of discretion for retirement villages apply where the permitted activity standard is not met, as set out in our response to CCZ-R6 above.</p>
S64.132	CCZ-R16	Oppose and seek amendment	<p>Amend CCZ-R16 as follows:... <u>3. Activity status: Restricted discretionary Where: a) Compliance is not achieved with one or more of the standards under CCZ-R16-1.a, and the activity is for the construction of buildings associated with a retirement village. Matters of discretion are restricted to: (1) The effects arising from exceeding any of the following standards: CCZ-S2 and CCZS4; (2) The effects of the retirement village on the safety of adjacent streets or public open spaces; (3) The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces; (4) When assessing the matters in 1 – 3, consider: (a) The need to provide for efficient use of larger sites; and (b) The functional and operational needs of the retirement village. (5) The positive effects of the construction, development and use of the retirement village. For clarity, no other rules or matters of discretion</u></p>	<p>Unlike the other zones, the construction of new buildings and structures in the City Centre Zone are provided for as a restricted discretionary activity under CCZ-R16 when complying with the relevant activity standards (rather than a permitted activity). Where the construction of retirement village buildings is a restricted discretionary activity (when activity standards are infringed), a focused set of retirement village matters of discretion should apply (so to provide for and acknowledge the differences they have from other residential activities). As noted in response our to CCZ-R19, the consider that retirement villages as an activity should be a permitted activity in the City Centre Zone, and only the construction of a retirement village that is assessed as a restricted discretionary activity. The matters of discretion applicable to retirement villages need to appropriately provide for / support the efficient use of larger sites for retirement villages, and their functional and operational needs.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<u>relating to the effects of density apply to buildings for a retirement village.</u> <u>Notification status: An application for resource consent for a restricted discretionary activity under this rule is precluded from being publicly notified. An application for resource consent for a restricted discretionary activity under this rule that complies with CCZ-S2 and CCZ-S4 is precluded from being limited notified.</u>	
S64.133	CCZ-R19	Oppose and seek amendment	Amend CCZ-R19 for retirement villages to be a permitted activity in the City Centre Zone.	Support the inclusion of a retirement village specific CCZ-R19 but oppose the discretionary activity status. Recognising that the Enabling Housing Act is not limited to residential zones, with councils required to ensure district plans provide for intensification of urban non-residential zones, consider that the City Centre Zone should provide for retirement village activities as a permitted activity (with the construction of the retirement village being a restricted discretionary activity). They provide substantial benefits including enabling older people to remain in familiar community environments for longer and freeing up a number of dwellings located in surrounding suburbs.
S64.134	Entire IPI	Oppose	Seeks that retirement villages are expressly excluded from having to apply the Medium and High Density Design Guide.	Oppose the Medium and High Design Guide which make no specific reference to retirement villages. There is no guidance as to why the requirements that are applicable to non-retirement village activities apply in the same manner to retirement villages, which have different functional and operational needs.
S64.135	Entire IPI	Oppose	Seek that retirement villages are expressly excluded from having to apply the City Centre Zone Design Guide.	Oppose the City Centre Design Guide which make no specific reference to retirement villages. There is no guidance as to why the requirements that are applicable to non-retirement village activities apply in the same manner to retirement villages, which have different functional and operational needs.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S64.136	Entire IPI	Seek amendment	Seek that the IPI addresses the critical need for and shortage of retirement accommodation and aged care. Submit proposed amendments to address and / or any alternative or consequential relief to address the matters addressed in this submission.	The critical need for and shortage of retirement accommodation and aged care, with demand for suitable accommodation that enhances wellbeing continuing to grow, and that there is a clear and consistent regime for retirement villages needs to be addressed. HUD identifies the ageing population as a key challenge, and over 65's are likely to make up a fifth of the population by 2034. It is important that potential effects from retirement villages are managed proportionately and efficiently with the least regulation and prescription necessary. The significant benefits of retirement villages, including employment opportunities, as well as their different build pattern with a greater demand for a 'continuum of care' in one location, also need to be given appropriate weight.
S64.137	Entire IPI	Seek amendment	Submit proposed amendments to address and / or any alternative or consequential relief to address the matters addressed in this submission.	Seek national consistency in the planning regimes for retirement villages through the intensification planning instruments required under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (Enabling Housing Act).
S64.138	Entire IPI	Seek amendment	Seek that the IPI is amended to provide a retirement-village specific framework as follows: <ul style="list-style-type: none"> • Adoption of the MDRS, as a number of provisions as notified dilute, conflict with or overlap with the MDRS; • The relief sought in relation to specific provisions to make sure that they are workable for retirement villages including: <ol style="list-style-type: none"> 1. The directiveness of the MDRS and the direction of the NPSUD is not diluted through the addition of new, 	The IPI is a major opportunity to better enable the provision of a diverse range of retirement housing and care option and give effect to the NPSUD, specifically that well-functioning urban environments, as well as enabling all people and communities to provide for their wellbeing, health, and safety. A "variety of homes" are needed to meet the "needs of different households". Retirement villages will not be permitted activities under the MDRS because of the "no more than 3 residential units per site" density standard. However, retirement villages require "the construction and use of 4 or more residential units on a site". The IPI must include a restricted discretionary activity rule for retirement villages in all relevant residential zones.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>undefined concepts such as a ‘high quality residential environment’ or a ‘pleasant and coherent’</p> <ol style="list-style-type: none"> 2. Objectives and policies that appropriately recognise the acute need for retirement housing and care in all relevant residential zones 3. Rules to enable retirement villages in the GRZ and HRZ. 4. Tailored matters of discretion for retirement villages 5. Proportionate notification 6. Clear, targeted, and appropriate development standards 7. Providing for retirement villages in commercial zones 8. A clear and transparent regime for financial contributions <ul style="list-style-type: none"> • Any alternative or consequential relief to address the matters addressed in this submission. 	
S64.139	Entire IPI	Seek amendment	<p>Seek that the IPI is amended to provide a retirement-village specific framework as follows:</p> <ul style="list-style-type: none"> • Adoption of the MDRS, as a number of provisions as notified dilute, conflict with or overlap with the MDRS; • The relief sought in relation to specific provisions to make sure that they are workable for retirement villages including: <ol style="list-style-type: none"> 1. The directiveness of the MDRS and the direction of the NPSUD is not 	<p>The IPI needs to enable intensification and must ensure that retirement villages are specifically and appropriately provided for and enabled in all relevant residential and commercial/mixed use zones. This outcome can only be achieved by providing for a retirement village-specific objective, policy, and rule framework.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>diluted through the addition of new, undefined concepts such as a 'high quality residential environment' or a 'pleasant and coherent'</p> <ol style="list-style-type: none"> 2. Objectives and policies that appropriately recognise the acute need for retirement housing and care in all relevant residential zones 3. Rules to enable retirement villages in the GRZ and HRZ. 4. Tailored matters of discretion for retirement villages 5. Proportionate notification 6. Clear, targeted, and appropriate development standards 7. Providing for retirement villages in commercial zones 8. A clear and transparent regime for financial contributions <ul style="list-style-type: none"> • Any alternative or consequential relief to address the matters addressed in this submission. 	
S64.140	Entire IPI	Seek amendment	<p>Seek that the IPI is amended to provide a retirement-village specific framework as follows:</p> <ul style="list-style-type: none"> • The relief sought in relation to specific provisions to make sure that they are workable for retirement villages including: • Any alternative or consequential relief to address the matters addressed in this submission. 	<p>The IPI must recognise that retirement villages are a residential activity as they provide permanent homes for the residents that live there, and the range of ancillary services are provided for residents only. This recognition requires that retirement villages as a land use are a permitted activity.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S64.141	Entire IPI	Seek amendment	<p>Seek that the IPI is amended to provide a retirement-village specific framework as follows:</p> <p>3. Rules to enable retirement villages in the GRZ and HRZ.</p> <ul style="list-style-type: none"> Any alternative or consequential relief to address the matters addressed in this submission. 	<p>Retirement villages should be provided for in the GRZ and HRZ 72 to support 'ageing in place' and wellbeing, and allow residents to remain close to their families, friends, familiar amenities, public transport, other support networks and communities they helped to establish.</p>
S64.142	Entire IPI	Seek amendment	<p>Seek that the IPI is amended to provide a retirement-village specific framework as follows:</p> <ul style="list-style-type: none"> Adoption of the MDRS, as a number of provisions as notified dilute, conflict with or overlap with the MDRS; The relief sought in relation to specific provisions to make sure that they are workable for retirement villages including: <ol style="list-style-type: none"> The directiveness of the MDRS and the direction of the NPSUD is not diluted through the addition of new, undefined concepts such as a 'high quality residential environment' or a 'pleasant and coherent' Objectives and policies that appropriately recognise the acute need for retirement housing and care in all relevant residential zones Rules to enable retirement villages in the GRZ and HRZ. Tailored matters of discretion for retirement villages Proportionate notification 	<p>Retirement villages change the existing urban environments that are dominated by 'typical' dwellings. They tend to be larger and include factors and amenities that may be a key driver for the layout within a unit and the village. District plans need to recognise the functional and operational needs of retirement villages and provide for change to the character and amenity of existing neighbourhoods to enable the benefit of retirement villages in response to the NPSUD and HUD. The current planning system can be slow to respond leading to delays in supply, or incentivise land banking, so specific provision is needed to enable retirement housing and aged care.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			<p>6. Clear, targeted, and appropriate development standards</p> <p>7. Providing for retirement villages in commercial zones</p> <p>8. A clear and transparent regime for financial contributions</p> <ul style="list-style-type: none"> Any alternative or consequential relief to address the matters addressed in this submission. 	
S64.143	Entire IPI	Seek amendments	<p>Seek that the IPI is amended to provide a retirement-village specific framework as follows:</p> <ul style="list-style-type: none"> The relief sought in relation to specific provisions to make sure that they are workable for retirement villages including: Any alternative or consequential relief to address the matters addressed in this submission. 	<p>Large sites provide unique opportunities to internalise potential impacts of intensification on neighbours and the neighbourhood. Traditional housing typologies (e.g. outlook, sunlight, privacy, outdoor living spaces, landscaping and the like) are not necessarily appropriate for retirement villages. This approach fails to recognise access to a wide range of communal spaces in retirement villages, as well as their individual homes, so their amenity is provided by the village as a whole rather than an individual space. All of these areas, as well as a proportion of internal space (such as shared living rooms) should be counted towards this amenity standard.</p>
S64.144	Entire IPI	Seek amendments	<p>Seek that the IPI is amended to provide a retirement-village specific framework as follows:</p> <p>1 Proportionate notification of consents</p> <p>2 Any alternative or consequential relief to address the matters addressed in this submission.</p>	<p>Council officers have too much discretion to require applicants to provide further information, often and have the ability to wield the threat of notification if the requested information is not provided. It is therefore important that matters of discretion for decision-making are clear and focused on the aspects that matter.</p>
S64.145	Entire IPI	Seek amendments	<p>Seek that the IPI is amended to provide a retirement-village specific framework as follows:</p> <p>1 Proportionate notification of consents</p>	<p>Provide appropriately focused notification rules 102 Notification and 'NIMBYism' is an issue and can create huge delays and disputes for no material environmental benefit. Notification must be proportional to the issues at hand. Applications for</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			2 Any alternative or consequential relief to address the matters addressed in this submission.	residential activities that are anticipated in residential zones should not be publicly notified and public participation should be at the plan making stage.
S64.146	Entire IPI	Seek amendments	Seek that the IPI is amended to provide a retirement-village specific framework as follows: 1 Proportionate notification of consents 2 Any alternative or consequential relief to address the matters addressed in this submission.	Limited notification may remain, however, given the significant costs associated with notification, it should only be required where it will benefit the decision-making process and compliance with standards is not met. The retirement village-specific framework sought takes a similar approach (given that retirement villages are a form of development with four or more residential units) with the standards informing matters of discretion and limited notification presumptions.
S64.147	Entire IPI	Seek amendments	Seek that the IPI is amended to provide a retirement-village specific framework as follows: 1 Rules to enable retirement villages in the commercial zones. 2 Any alternative or consequential relief to address the matters addressed in this submission.	Retirement villages should not be difficult to consent and are generally sought to be located residential areas. However, due to the lack of suitable sites in existing residential areas and need to respond to the retirement living and care crisis, some are operated in commercial and mixed use zones where there is good access to services and amenities. City centre, metropolitan centre, neighbourhood centre, local centre, and town centre zones in particular provide opportunities for retirement villages as these areas serve the surrounding local communities and provide close access for amenities to residents who are often unable to walk long distances.
Submitter 65: Stephen Pattinson – LATE SUBMISSION				
S65.1	SUB-RES-R2	Seek amendment	General Residential Zone - subdivision under SUB-RES-R2. Proceed with the zone change in Pinehaven from Residential Conservation to General Residential with consequent minimum lot sizes being reduced from 750m2 (front) and 900m2 (rear) to 400m2 for both front and rear lots.	Qualifying matters (Add UFD-O4): Introduce new Policy (LCZ-P8); Flood zone Pinehaven Catchment Overlay (SUB-RES-R9). I support qualifying matters, but only for genuine qualifying matters. The flood zones in the Pinehaven Stream Catchment Overlay are not genuine qualifying matters. These flood zones were determined by false data and supported by a false "Pinehaven Stream Flood Mapping Audit" by Beca (2015) in which the auditor discovered but failed to disclose to the public

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
				<p>the truth about the flood model being fatally flawed. It failed to detect an approximate 300% increase in stormwater runoff and flood volume in the SKM "Future Case Scenario" so it is not reliable as a base model for determining flood zones nor for assessing future development on the hills for hydraulic neutrality. Contrary to claims by Council, the Environment Court did not find the Pinehaven Stream flood model and flood maps fit for purpose. These non-genuine flood zones have a negative impact on property owners. They can falsely show properties in a flood zone when in fact they are not, negatively impacting property insurance and preventing potential development opportunities for the owners.</p> <p>General Residential Zone - subdivision under SUB-RES-R2. Front and rear lots 400m2 minimum. I support the zone change in Pinehaven from Residential Conservation to General Residential with consequent minimum lot sizes being reduced from 750m2 (front) and 900m2 (rear) to 400m2 for both front and rear lots. The reason I support this is because I believe it is better to intensify the valley floor rather than allow intensive residential development on the Pinehaven and Silverstream hills (Southern Growth Area). An Infiltration Report by Alex Ross shows that the forested and bush-clad hills around Pinehaven (which make up 80% of the Pinehaven Stream catchment) have extraordinarily high infiltration rates (500mm/hr - 900mm/hr by field tests). In contrast, typical valley floor (suburban lawns in Pinehaven, and grassed open space areas in Pinehaven Reserve) have virtually no infiltration capacity (1-2mm/hr by field tests). It makes sense therefore to preserve the forested hills for their infiltration capacity and intensify instead on the valley floor where new impervious areas (new steel roofs and concrete driveways) will make little if any difference to stormwater runoff because of the virtual impervious compacted clays under existing suburban lawns.</p>

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S65.2	Entire IPI	Seek amendment	Qualifying matters (Add UFD-O4): Introduce new Policy (LCZ-P8); Flood zone Pinehaven Catchment Overlay (SUB-RES-R9). Re-assess the flood zones in the Pinehaven Stream Catchment Overlay using accurate input parameters that are truly representative of the catchment in order to provide flood zones that are genuine 'qualifying matters'	Appendix HBA Update 2022 (pp54,55) - Southern Growth Area (Guildford): I do not support Council's intention to make the Silverstream and Pinehaven hills "urban". The Guildford land on these hills is currently zoned for a maximum 1 dwelling per 20ha (minimum lot size 20ha). This is appropriate for the high earthquake zone and very steep slip-prone hazardous land of the Silverstream and Pinehaven hills. As mentioned above, the forested and bush-clad hills around Pinehaven (which make up 80% of the Pinehaven Stream catchment) have extraordinarily high infiltration rates (500mm/hr - 900mm/hr by field tests). The high infiltration capacity of the greenbelt Pinehaven hills protects Pinehaven from much stormwater runoff in high and severe storm events, maintains stream base flows and replenishes the aquifer, and must be preserved and protected against intensive development. I believe it is inappropriate to propose intensive housing on the so-called "Southern Growth Area" (Guildford), estimated now by Council (HBA May 2022) to have a yield of 1,960 to 2,857 lots (up from HBA 2017 estimate of 1,000 lots). Intensification is better located in Council's proposed High Density Residential Zone close to rapid electric passenger rail stations and existing infrastructure, shops and public amenities
S65.3	Entire IPI	Seek amendment	Reverse Council's support for the Southern Growth Area (Guildford) and do not intensively develop the Silverstream and Pinehaven hills or make them "urban". Rather, preserve and protect the Silverstream and Pinehaven greenbelt hills in the Southern Hills Overlay to protect the high visual, ecological and landscape values of these hills.	Appendix D of the HBA Update 2022 (pp54,55) - Southern Growth Area (Guildford):

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
Submitter 66: Janice Carey				
S66.1	Entire IPI	Not stated	No shadowing of homes. Please make sure you choose wisely. There are many obvious suitable locations to build high buildings, CBD, near railway lines, spaces next to green areas, river area, industrial areas. Very high buildings could be built along the base on the eastern hills from Rifle Range, north past CBD and further casting no shadows on homes. Keep us warm and healthy, not depressed.	Any height building definitely should not cast shadows on any citizens existing homes. Our warm sunny homes have been chosen, paid for - also rates paid for - and lived in many years, (some 50 like ours). Shaded homes would create sick, depressed, miserable, cold homes. We all need to stay healthy and happy as possible.
Submitter 67: Anthony Carey				
S67.1	Entire IPI	Not stated	The council revisit the proposed IPI and reject any high residential building if they encroach and shadow other properties where people live. Provision to be made that buildings must have off-street parking as an example, the complex in Lower Hutt, High Street at Taita has shown with angle parking out on road, would be impossible on the likes of Fergusson Drive, etc.	As the gateway our city, that Fergusson Drive from Silverstream Bridge to the CBD be exempt from this plan as the history and character is shown in this area with established houses and trees which welcome people to our city and amenities. The Council limit high storey building to areas where shadowing and restrictions to sunlight will not occur. The eastern hills (Wallaceville) would be ideal along with land along the railway (e.g. Marion, Miro Street, etc.). Also the river stopbank areas.
Submitter 68: Louise Cleghorn				
S68.1	Entire IPI	Seek amendment	Retain current regulations to ensure no houses affect each other's light	Housing this close provides no space and not enough natural light leads to poor mental health / higher violence / suicides etc.
S68.2	Entire IPI	Seek amendment	Seek higher provision for road repairs.	Too much road traffic / usage.
S68.3	Entire IPI	Seek amendment	Seek that no subdivision is below 350sqm per section unless this in in the CBD.	Not enough privacy could lead to claustrophobia. Takes away the appeal of Upper Hutt. Each house / site needs a garage to park / charge their vehicle.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S68.4	Entire IPI	Seek amendment	Seek provision for local medical centres, housing provided for doctors as needed and centres made available. Appropriate provision for other infrastructure e.g. shops / schools / additional visitor parking / roading.	Not enough health facilities for people at present let alone for extras. Schools, shops, parking for visitors?
Submitter 69: RACE Inc (Racing at Awapuni and Trentham Combined Enterprises Incorporated) – LATE SUBMISSION				
S69.1	Maps	Seek amendment	Seek that 1) the part of the Trentham Racecourse shown hatched on the attached aerial at Pt Lot 2 527769 and Lot 4 522882 be rezoned, and 2) that the Mixed Use Zone provisions apply.	Request that 1. the part of the Trentham Racecourse shown hatched on the attached aerial at Pt Lot 2 527769 and Lot 4 522882 be rezoned Mixed Use; and 2. that the Mixed Use Zone Plan Change Provisions apply to the abovementioned and identified Pt Lot 527769 and Lot 4 DP 522882. The Trentham Racecourse is zoned Special Activity Zone in the operative Upper Hutt District Plan. The provisions of the Special Activity Zone are no longer fit for purpose to enable racecourse site to diversify the range of activities and pursue complementary development opportunities to provide for the sustainable management of the site. The provisions of the Mixed Use Zone in Draft Plan Change 54 provide for a range of activities and the rules and standards of the Mixed Use Zone are appropriate to manage and control the effects of the use of the site into the future.
Submitter 70: CBDI Limited and CBD Land Limited – LATE SUBMISSION				
S70.1	Maps	Support	To retain the rezoning of lots 1-3 DP 456184 and Lot 2 DP 452529 to Mixed Use Zone from General Industrial Zone.	Support the rezoning of lots 1-3 DP 456184 and Lot 2 DP 452529 to Mixed Use Zone. The IPI recognises the transformation of the South Pacific Business Park and Brewtown into a mixed use precinct at the edge of the CBD containing a wide range of activities. The Mixed Use Zoning reflects the uses on the site and will ensure sustainable management and appropriate management and control of this centrally located and accessible site.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
Submitter 71: The Heretaunga Co Limited and The Heretaunga Co No2 Limited – LATE SUBMISSION				
S71.1	Maps	Seek amendment	The New Zealand Campus of Innovation and Sport and Sports Hub be rezoned Mixed Use Zone in the IPI Plan Change.	The NZCIS & Sports Hub are zoned Special Activity in the operative Upper Hutt District Plan. The Special Activity Zone was applied to the site back in 2004 when the District Plan became operative, at which time the site was then owned by the Government and operated by the now defunct Central Institute of Technology (CIT) for tertiary education. The land and campus facilities were sold to the Heretaunga Company in 2015. The Heretaunga Company has upgraded and re-purposed the campus buildings, facilities, and sports fields into the NZCIS and Sports Hub. The Special Activity Zone is no longer fit for purpose for the now established use and development as the only permitted activities on the site in the ODP are SAR-R3 and SAR-R7. The effect of this is that any activity or development on the NZCIS and Sports Hub site other than educational functions and active and or passive recreation requires a resource consent application. The provisions for the Mixed Use Zone under Draft Plan Change 54 are now an accurate reflection of the range of activities and development that is now established and existing at the NZCIS and Sports Hub site, and the rules and standards of the Draft Mixed Use Zone are appropriate to manage and control the use of the site into the future.
Submitter 72: Ngati Toa – LATE SUBMISSION				
S72.1	HRZ-01	Oppose and seek amendment	HRZ-01 Well-functioning urban environments - Re-craft the objective HRZ-01 to reflect environmental wellbeing in the drafting.	A well-functioning urban environment should be able to provide for 'environmental' wellbeing as the cultural wellbeing encompasses environmental wellbeing.
S72.2	HRZ-02	Oppose and seek amendment	HRZ-02 Housing Variety - Reword the objective to expand and specify Housing Variety also includes Papakāinga and that the clause (b) is not supposed to limit	This objective does not specify iwi housing aspirations in that it does not necessarily include or exclude Papakāinga. Objective HRZ-02 (b) also may be interpreted as impediment for Papakāinga proposals.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			Tangata Whenua's right to Papakāinga and cannot be held as a reason for proposing Papakāinga.	
S72.3	HRZ-O3	Support and seek amendment	HRZ-O3 Hydraulic Neutrality - Reword the objective to reflect that we expect high density developments do not just do the bare minimum (neutrality) but aspire to achieve best practice to ensure they create hydraulic positivity in the catchment and improve the quality of the environment.	It is positive to see this objective trying to incorporate hydraulic neutrality into High Density development. Developments should not only be hydraulically neutral but also should provide 'hydraulic positivity' if they can. This means that they are able to show how they improve the environment
S72.4	HRZ-P1	Oppose and seek amendment	HRZ-P1 - Identify sites and areas of significance and the boundaries of qualifying matter in this regard.	Since the Upper Hutt Operative District Plan does not contain detailed information regarding the relationship Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga, it will be hard to capture how qualifying matters will apply
S72.5	HRZ-P3	Oppose and seek amendment	HRZ-P3 - Reword the policy to put some substance around the day-to-day and reword to expand on the wellbeing as it speaks to day-today needs also.	We are unsure whether the day-today needs of residents can be interpreted by developers to be a tiny shoe box. This does not enable wellbeing nor is it the right answer to housing issues, although it might meet someone's day-to-day needs.
S72.6	HRZ-P4	Oppose and seek amendment	HRZ-P4 - Delete current wording and insert: <i>Provide for developments that achieve high quality design and environmental objectives.</i>	This Policy is fundamentally against the logic of the RMA. How can we generically produce a policy that blanketly accepts to cater for activities that are not permitted.
S72.7	HRZ-P8	Support and seek amendments	HRZ-P8 - Retain current wording and add 'hydraulic positivity' to wording.	We support the intent and strength of the Policy. We suggest adding, the said development proposals also add to the hydraulic positivity

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S72.8	NCZ Introduction	Support and seek amendments	NCZ Introduction to chapter - Rephrase the introduction to reflect the visibility of Tangata Whenua in the Neighbourhood Centre Zone, as well as how they see commercial spaces to reflect their economic aspirations.	The purpose of introducing this Chapter is clear and understood. However, there is not any consideration of how iwi and Māori of Upper Hutt conceives the NCZ. These commercial aspirations or how the NCZ would look and feel from Tangata Whenua perspective should be reflected in the introduction.
S72.9	NCZ-O1	Support and seek amendment	NCZ-O1 - Purpose of the Neighbourhood Centre Zone - Recraft the Objective to reflect the purpose of the NCZ is also to increase the visibility of Tangata Whenua and ensure Tangata Whenua's kaitiakitanga role over the whenua is spelled out.	As per our comments on the introduction section of the NCZ, the purpose of this Zone should elevate the Kaitiakitanga and Manaakitanga role Tangata Whenua has over the Zone /Tākiwa.
S72.10	NCZ-O3	Support and seek amendment	NCZ-O3 Managing effects at the Zone Interface - Caveat the proposition in the Objective to say: <i>have no adverse effects if the site's amenity values are embedded with cultural values and are taonga to Tangata Whenua.</i>	It is not possible to gauge the scope and level of adverse effects, 'having minimal adverse effects' may be subjective. Has this been left to consent planners' discretion? Amenity values can include taonga and cultural values. Since these are not available at this point in time and not mapped in this whenua, it is hard for consent planners to execute judgement on this.
S72.11	NCZ-O4	Support and seek amendments	NCZ-O4 Hydraulic neutrality - Recraft the objective to include hydraulic positivity.	We support the intent of the Objective. We believe any development in this zone should also contribute to the hydraulic positivity.
S72.12	NCZ-R3	Oppose and seek amendment	NCZ-R3 Demolition - Add wording to ensure, demolition as permitted activity does not negatively impact or have unintended consequences for SASMs or any other Tangata Whenua value on site.	We are concerned that in the absence of SASMs being identified and mapped, it is not ideal we are permitting demolition activities. This rule needs to caveat a potential overlay of SASMs or any other Tangata Whenua value, as qualifying matter.
S72.13	NCZ-S2	Oppose and seek amendment	NCZ-S2 - Height in relation to boundary NCZ-S3 Setback - Include provisions where	We are concerned these standards may not be able to address the sensitivities for SASMs, since no such overlay exists, we do

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			Tangata Whenua values apply that these standards need to have more space and less or no additional height.	not know how height in relation to boundary and setbacks are taking Tangata Whenua sensitivities into account.
S72.14	LCZO1, LCZ-O3, LCZO4 and LCZ-R3, LCZ-S2 and LCZS3	Oppose and seek amendment	Local Centre Zone introduction, LCZO1, LCZ-O3, LCZO4 and LCZ-R3, LCZ-S2 and LCZS3 - Include provisions where Tangata Whenua values apply that these standards need to have more space and less or no additional height.	We are concerned these standards may not be able to address the sensitivities for SASMs, since no such overlay exists, we do not know how height in relation to boundary and setbacks are taking Tangata Whenua sensitivities into account.
S72.15	MUZ-O1, MUZ-O3, MUZ-O4 and MUZR3, MUZ-S2	Oppose and seek amendment	Mixed Use Centre zone introduction, MUZ-O1, MUZ-O3, MUZ-O4 and MUZR3, MUZ-S2 and MUZ-S3 - Include provisions where Tangata Whenua values apply that these standards need to have more space and less or no additional height.	We are concerned these standards may not be able to address the sensitivities for SASMs, since no such overlay exists, we do not know how height in relation to boundary and setbacks are taking Tangata Whenua sensitivities into account.
S72.16	TCZO1, TCZ-O3, TCZO4, TCZ-R3, TCZS2 and TCZ-S3	Oppose and seek amendment	Town Centre Zone introduction, TCZO1, TCZ-O3, TCZO4, TCZ-R3, TCZS2 and TCZ-S3 - Include provisions where Tangata Whenua values apply that these standards need to have more space and less or no additional height.	We are concerned these standards may not be able to address the sensitivities for SASMs, since no such overlay exists, we do not know how height in relation to boundary and setbacks are taking Tangata Whenua sensitivities into account.
S72.17	CCZO1, CCZ-O3, CCZO4, CCZ-S2 and CCZ-S4 and CCZR12	Oppose and seek amendment	City Centre Zone introduction / Background, CCZO1, CCZ-O3, CCZO4, CCZ-S2 and CCZ-S4 and CCZR12 - Include provisions where Tangata Whenua values apply that these standards need to have more space and less or no additional height.	We are concerned these standards may not be able to address the sensitivities for SASMs, since no such overlay exists, we do not know how height in relation to boundary and setbacks are taking Tangata Whenua sensitivities into account.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S72.18	CCZ-City Centre Zone	Oppose and seek amendment	CCZ-City Centre Zone - Deletion Matters of Discretion - These need to be retained in the Plan to give signal to developers that a consent application can be vetoed on the basis of cumulative effects, lack of infrastructure and most importantly whether there are any Tangata Whenua values are breached.	We are concerned matters of discretion such as infrastructure, cumulative effects are deleted but also matters significant to Tangata Whenua is not included in this list
S72.19	New Medium and High Density Design Guide	Support and seek amendment	Introduce new Medium and High Density Design Guide - Review these design guides with Tangata Whenua to ensure Design Guides address Tangata Whenua principles and values and amend appropriate parts of the Plan to reflect Tangata Whenua may want to use their own design guide when and if such guidance is available.	The contents of these design guides do not reflect that they have been produced with Tangata Whenua. Tangata Whenua also will wish to use / refer to their own design guide when and if such iwi produced design guide is available. There is not any reference to such concept either.
S72.20	Entire IPI	Support and seek amendment	Whole Plan - Include more in depth provisions for climate resilience and adaptation to climate change.	The plan addresses climate change in relation to urban development however, this could be covered in more depth.
S72.21	NU-P9	Support	NU-P9 - Retain proposed change.	It is encouraging to see that this policy ensures that network utilities do not have adverse effects on the environment and applies a different activity status for more vulnerable zones.
S72.22	REG-R9	Support and seek amendment	REG-R9 - This rule to be recrafted to include matters of significance to Māori.	This rule does not consider matters of significance to Māori such as ancestral land and wāhi tapu.
S72.23	Renewable Energy Generation chapter	Support and seek amendment	Renewable Energy Generation Whole Chapter - Inclusion of an objective or policy for renewable energy generation to enable mitigation and adaption to climate change.	Considering the positive progress that renewable energy generation could create for mitigating and adapting to climate change, this chapter lacks referring to it adequately.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
S72.24	Ecosystems and Indigenous Biodiversity – Whole chapter.	Support and seek amendment	Ecosystems and Indigenous Biodiversity Whole Chapter - Include matters recognising mana whenua values for indigenous biodiversity, support the involvement of mana whenua in decision making, enable cultural activities and recognise the role of mana whenua as kaitiaki.	This chapter should consider mana whenua values for ecosystem and indigenous biodiversity, as well as support mana whenua partnership in decision making for indigenous biodiversity.
S72.25	General Subdivision Provisions that Apply in All Zones SUB-GEN-I2	Support	General Subdivision Provisions that Apply in All Zones SUB-GEN-I2 - Retain proposed change.	It is encouraging to see that this provision ensures that subdivision does not adversely affect significant natural landforms, areas of significant indigenous natural vegetation or significant habitats of indigenous fauna.
S72.26	Papakāinga Whole Chapter	Support	Papakāinga Whole Chapter - Retain proposed change	The inclusion of the papakāinga chapter in the District Plan is more enabling for these specific developments and supports the housing needs of mana whenua who wish to develop on and connect with their ancestral whenua in this District. The inclusion of this chapter also supports tino rangatiratanga and the expression of Māori culture and traditions in housing.
S72.27	GRZ-P1B and HRZ-P1	Support and seek amendment	GRZ-P1B and HRZ-P1 - Identify sites of significance to Māori in the plan.	It is encouraging to see provisions which recognise matters of significance such as Māori relationships with ancestral land, water, wāhi tapu, taonga and sites of significance. However, given that sites of significance for Māori are not currently identified in the plan, they are not fully protected from development.
S72.28	General Residential Zone - Precinct 1	Support and seek amendment	General Residential Zone - Precinct 1 – Indigenous Biodiversity Qualifying Matter Precinct - Objectives and policies in this chapter to use stronger wording and	Throughout the objectives and policies in this chapter we believe that the use of the word ‘encourage’, regarding protecting indigenous biodiversity reduces the likelihood that urgent and appropriate action will be taken to protect

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			<p>language. For example, Objective GRZ-PREC1-O1 would be more effective if it were reworded to say: <i>'Indigenous biological diversity values within the Indigenous Biodiversity Qualifying Matter Precinct are maintained and protected.'</i></p> <p>GRZPREC1-P1 could be reworded to say: <i>'Areas of significant indigenous vegetation and significant habitats of indigenous fauna are maintained and protected from the potential adverse effects of medium density residential development.'</i></p> <p>Therefore, objectives and policies in the plan should protect indigenous biodiversity from subdivision and development.</p>	<p>indigenous biodiversity. We would like to see active protection of indigenous biodiversity in the plan.</p>
S72.29	General Residential Zone - Precinct 1	Support and seek amendment	General Residential Zone - Precinct 1 – Indigenous Biodiversity Qualifying Matter Precinct - Inclusion of mana whenua values for indigenous biodiversity and enable cultural activities.	This chapter should give more consideration to mana whenua values and our ability to practice cultural activities such as customary harvest and sustainability
S27.30	Entire IPI	Not stated	The IPI Plan Change process will open the doors for developers, however in the absence of important overlays such as, SASMs and Significant Natural Areas (SNAs) that also have Tangata Whenua values, the Plan will be inadequate to provide necessary protection for these overlays. These overlays are qualifying matters. In the absence of such overlays, it is unclear how the Plan will deal with an	The IPI Plan Change process will open the doors for developers, however in the absence of important overlays such as, SASMs and Significant Natural Areas (SNAs) that also have Tangata Whenua values, the Plan will be inadequate to provide necessary protection for these overlays. These overlays are qualifying matters. In the absence of such overlays, it is unclear how the Plan will deal with an overlay that does not exist when the IPI provisions take effect.

Submission Point	Provision	Support / Oppose / Seek amendment	Decision Sought	Reasons
			overlay that does not exist when the IPI provisions take effect.	
S72.31	Entire IPI	Not stated	We are concerned that the urgency of giving effect to the IPI create unintended consequences which is not necessarily backed by evidence and analysis; this will be exacerbated by the fact that the fast-track process will remove further appeal rights. Our experience evaluating these changes in the District Plans showed that the NPS-UD requirements did not pass rigorous analytical tests and critical thinking. They lack serious assessment of regulatory impacts.	We are concerned that the urgency of giving effect to the IPI create unintended consequences which is not necessarily backed by evidence and analysis; this will be exacerbated by the fact that the fast-track process will remove further appeal rights. Our experience evaluating these changes in the District Plans showed that the NPS-UD requirements did not pass rigorous analytical tests and critical thinking. They lack serious assessment of regulatory impacts.
S72.32	Entire IPI	Not stated	<i>'Further pre-notification requirements concerning iwi authorities'</i> requires that iwi and Mana Whenua are given reasonable, adequate time, and opportunity to comment, consider the draft proposals and are able to give advice on the Plan Change Variations. The speed in which Council is forced to undertake IPI changes in order to comply with central government deadlines means that iwi have not been provided with reasonable and adequate time required by the legislation.	<i>'Further pre-notification requirements concerning iwi authorities'</i> requires that iwi and Mana Whenua are given reasonable, adequate time, and opportunity to comment, consider the draft proposals and are able to give advice on the Plan Change Variations. The speed in which Council is forced to undertake IPI changes in order to comply with central government deadlines means that iwi have not been provided with reasonable and adequate time required by the legislation.
Submitter 73: Jacqui Hargreaves				
S73.1	Entire IPI	Oppose	We should be standing up to the government and say no this is not happening.	Not stated

