

**Further Submission on the notified proposed Timaru District Plan by Kāinga Ora –  
Homes and Communities**

**Clause 8 of Schedule 1 to the Resource Management Act 1991**

**To:** Planning and Policy Team  
Timaru District Council  
PO Box 522  
Timaru  
*Submitted via email to: [pdp@timdc.govt.nz](mailto:pdp@timdc.govt.nz)*

**Name of Further Submitter:** Kāinga Ora – Homes and Communities

1. **Kāinga Ora – Homes and Communities (“Kāinga Ora”)** makes this further submission on the proposed Timaru District Plan (“**PTDP**”) in support of/in opposition to the renotification of primary submissions on the **PTDP**. This further submission is in addition to that which was submitted to Timaru District Council on 7 August 2023 (**attached as Appendix B**).
2. Kāinga Ora has an interest in PTDP that is greater than the interest the general public has, being an original submitter on the PTDP with respect to its interests as Crown entity responsible for the provision of public housing, and its housing portfolio in the Timaru District.
3. Kāinga Ora makes this further submission in respect of submissions by third parties to the PTDP which were renotified on 4 March 2024.

**Reasons for further submission**

4. The submissions that Kāinga Ora supports or opposes are set out in the table attached as **Appendix A** to this further submission.
5. The reasons for this further submission are:
  - (a) The reasons set out in the Kāinga Ora primary submission on the PTDP.
  - (b) In the case of the Primary Submissions that are opposed:

- (i) The Primary Submissions do not promote the sustainable management of natural and physical resources and are otherwise inconsistent with the purpose and principles of the Resource Management Act 1991 (“**RMA**”);
  - (ii) The relief sought in the Primary Submissions is not the most appropriate in terms of section 32 of the RMA;
  - (iii) Rejecting the relief sought in the Primary Submissions opposed would more fully serve the statutory purpose than would implementing that relief; and
  - (iv) The Primary Submissions are inconsistent with the policy intent of the Kāinga Ora primary submission.
- (c) In the case of Primary Submissions that are supported:
- (i) The Primary Submissions promote the sustainable management of natural and physical resources and are consistent with the purpose and principles of the RMA and with section 32 of the RMA;
  - (ii) The reasons set out in the Primary Submissions; and
  - (iii) Allowing the relief sought in the Primary Submissions supported would more fully serve the statutory purpose than would disallowing that relief.
6. Without limiting the generality of the above, the specific relief in respect of each Primary Submission that is supported or opposed is set out in **Appendix A**.
7. Kāinga Ora wishes to be heard in support of its further submission.
8. If others make a similar submission, Kāinga Ora will consider presenting a joint case with them at a hearing.

**DATED** 18 March 2023

**Kāinga Ora – Homes and Communities**



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**Brendon Liggett**

**Manager – Development Planning**

**ADDRESS FOR SERVICE:**

*Kāinga Ora – Homes and Communities*

*Attention: Development Planning Team*

*Email: [developmentplanning@kaingaora.govt.nz](mailto:developmentplanning@kaingaora.govt.nz)*

Appendix A – Further Submission Table

Provision/ Chapter Topic	Submitter	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora Reasons	Decision(s) sought (allow or disallow)
SD-O6 – Business Areas and Activities	Synlait Milk Limited	163.2	Amend	<p>Supports the intent of SD-O6 but considers that it also needs to protect industrial zoned land from reverse sensitivity effects i.e. the purpose and function of industrial areas need to be strategically recognised as important to enabling those business activities. The submitter notes that the Noise Chapter makes reference to reverse sensitivity effects, but there are no other provisions for management of reverse sensitivity effects in relation to other aspects of the Industrial environment eg heavy vehicles, high traffic volumes, lighting, air discharges or visual effect. [see original submission for full reason]</p> <p>Amend SD-O6 as follows:</p> <p><i>Business and economic prosperity in the District is enabled in appropriate locations, including by:</i></p> <p><i>i. providing sufficient land for a range of business activities to cater for projected growth; ii. providing opportunities for a range of business activities to establish and prosper, provided that commercial activities outside of commercial areas are limited so they do not detract from the role and function of the City Centre and Town Centre zones. <u>iii. protecting the purpose and function of Industrial areas.</u></i></p> <p>OR wording to similar effect.</p>	Oppose	Kāinga Ora opposes this submission point as it is inconsistent with the Kāinga Ora Primary Submission.	Disallow
Definitions “Reverse Sensitivity”	Federated Farmers	182.24	Support	<p>Supports this definition. As this is an important resource management issue for the submitter and the definition is an accurate description.</p>	Support	Kāinga Ora supports the notified definition of ‘reverse sensitivity’.	Accept

				1. Retain as notified; OR 2. Words of the same intent; AND 3. Any consequential amendments.			
NH-P4 – Subdivision, use and development in Flood Assessment Areas, excluding high hazards areas and overland flow paths	Milward Finlay Lobb	60.15	Amend	<p>Concerned there is no mention of a freeboard with regard to the flooding. TDC have that extra added in their GiS layer system.</p> <p>Amend NH-P4 Subdivision, use and development in Flood Assessment Areas, excluding high hazard areas and overland flow paths as follows: <i>Enable subdivision, use and development (excluding Regionally Significant Infrastructure) in areas subject to inundation by a 0.5% AEP flood event provided that: [...] 7. increased risk on other sites is avoided as a priority and where this is not practicable, will be appropriately mitigated.; and 8. Flood modelling is to included an allowance for freeboard.</i></p>	Oppose	Subject to the Kāinga Ora primary submission, Kāinga Ora opposes this submission point as it is unclear if the submitter is wanting to have a freeboard allowance as permitted, or calculated into flood modelling levels. Overall, Kāinga Ora is unclear on the submitters intent for the proposed change.	Disallow
Definitions “High Hazard Area”	Canterbury Regional Council (Environment Canterbury)	183.14	Amend	<p>Considers the definition of high hazard in the CRPS is wider than just freshwater flooding and includes areas subject to coastal flooding and coastal erosion. These matters need to be addressed in a consistent manner across the PDP, and the definition updated.</p> <p>1. Amend the definition of High Hazard Areas to be consistent with the definition in the CRPS by including coastal hazards. And 2. Consequential amendments in the Coastal Environment chapter to ensure that activities are treated in the same manner (except as required by the NZCPS, which places some higher requirements on the provisions of coastal hazards). Include cross references to coastal hazards in the Coastal Environment chapter.</p>	Support in Part	Kāinga Ora supports the inclusion of the coastal hazards, where consistent with the Kāinga Ora primary submission.	Allow in Part
General	House Movers Section of the New Zealand Heavy Haulage Association Inc	184.2	Amend	<p>The submitter supports express provision for demolition of all buildings excluding heritage buildings as a permitted activity in all zones where building activities are provided for as a permitted activity.</p> <p>Request that demolition of non-heritage buildings as a permitted activity in all zones where building activities are provided for as a permitted activity.</p>	Support in Part	Kāinga Ora is unclear if the submitter considers that demolition in all zones outside the central city zone would require consent (unless a heritage overlay applies). Kāinga Ora is under the understanding that unless demolition occurs in the CCZ	Accept in Part

						or is subject to a heritage overlay, demolition would be permitted, noting that any necessary building consent requirements may still apply. If this is not the case, then Kāinga Ora supports the clarification in the Plan around permitted building demolition where heritage overlays do not apply.	
NOISE-P5 Reverse Sensitivity	KiwiRail Holdings Limited	187.76	Amend	<p>Supports the recognition of higher noise environments within close proximity to a railway line. The submitter seeks amendment to identify that noise and vibration effects are felt within 100m of a railway line and this should be specified in policy. Considers clauses 1-4 in first part are not required and would weaken the intent of the policy to meet NOISE-O2 and protect railway lines from reverse sensitivity effects.</p> <p>Amend NOISE-P5 Reverse sensitivity as follows: <i>Require noise sensitive activities located in higher noise environments to be located and designed so as to minimise adverse effects on the amenity values and health and safety of occupants and minimise sleep disturbance from noise, while taking into account: 1. the type of noise generating activity; and 2. other noise sources in the area; and 3. the nature and occupancy of the noise sensitive activity; and</i></p> <p><i>4. mitigation measures, including acoustic insulation, screening and topography. For the purpose of this Policy, higher noise environments include: 1. Commercial and Mixed-Use Zones; and 2. Residential zones in close proximity to any General industrial zone and areas within the Port Noise Outer Control Boundary and within that part of the Medium Density Residential Zone and City Centre Zone located within the Port Noise Inner Control Boundary; and 3. Locations <u>within 100m of</u> <del>in close proximity</del> to a State Highway or <del>the</del> railway line.</i></p>	Oppose	Kāinga Ora considers that at a policy level this is too restrictive, and applies a blanket approach. Setbacks should be based on actual modelled effects.	Disallow

MUZ - Standards	Te Pukenga – New Zealand Institute of Skills and Technology	215.12	Amend	<p>Considers a new rule is required to ensure adequate setbacks from road boundaries are provided.</p> <p>As alternative relief to the submitters preferred relief insert a new rule MUZ-S7 Road Boundary Setbacks as follows:</p> <p><u><i>MUZ-S7 Road Boundary Setbacks Any building or structure must be setback a minimum of 3m from any road boundary. Matters of discretion are restricted to: 1. landscaping; 2. openness, dominance and attractiveness when viewed from the street; and 3. mitigation measures.</i></u></p>	Oppose	Kāinga Ora does not consider it appropriate to have a 3m road boundary setback in the MUZ.	Disallow
General – All Zones	The Retirement Villages Association of New Zealand	230.9	Amend	<p>Submitter seeks to introduce a new objective to all zones that provide for residential activity that address the NPS-UD and better enables the provision of a diverse range of retirement housing and care options in the District.</p> <p>Amend the PDP to include the below new objective in all zones that provide for residential activity: <u><i>O# Aging Population Recognise and enable the housing and care needs of the aging population.</i></u></p>	Support in Part	<p>Kāinga Ora agrees that housing should provide options for all people. It is the view of Kāinga Ora, that if a new policy is inserted, it should be more reflective of diverse housing types, rather than targeting a specific demographic.</p> <p><u><i>O# Aging Population</i></u></p> <p><u><i>Recognise and enable the a diverse range of housing options and care needs of the aging population.</i></u></p>	Allow in Part
General – All Zones	The Retirement Villages Association of New Zealand	230.10	Amend	<p>Submitter seeks to introduce a new objective to all zones that provide for residential activity that address the NPS-UD and better enables the provision of a diverse range of retirement housing and care options in the District.</p> <p>Amend the PDP to include the below new policies in all zones that provide for residential activity:</p>	Support in Part	Kāinga Ora agrees that housing should provide options for all people. It is the view of Kāinga Ora, that if a new policy is inserted, it should be ore reflective of diverse housing types, rather than targeting a specific demographic.	Accept in Part

			<p><u>P# - Changing Communities</u></p> <p><u>To provide for the diverse and changing residential needs of communities, recognise that the existing character and amenity of the zone will change over time to enable a variety of housing types with a mix of densities.</u></p> <p><u>P# Larger Sites Recognise the intensification opportunities provided by larger sites within the medium density residential zone by providing for more efficient use of those sites.</u></p> <p><u>P# - Provision of housing for an ageing population</u></p> <p><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 the medium density residential zone, such as retirement villages.</u></p> <p><u>2. Recognise the functional and operational needs of retirement villages, including that they:</u></p> <p><u>a. May require greater density than the planned urban built character to enable efficient provision of services.</u></p> <p><u>b. Have unique layout and internal amenity needs to cater for the requirements of residents as they age.</u></p> <p><u>P# Role of density standards</u></p> <p><u>Enable the density standards to be utilised as a baseline for the assessment of effects of developments.</u></p>	<p>Kāinga Ora considers that the existing objectives and policies for retirement villages in the GRZ and MDZ are appropriate.</p> <p><u>P# - Changing Communities</u></p> <p><u>To provide for the diverse and changing residential needs of communities, recognise that the existing character and amenity of the zone will change over time to enable a variety of housing types with a mix of densities.</u></p> <p><u>P# Larger Sites Recognise the intensification opportunities provided by larger sites within the medium density residential zone by providing for more efficient use of those sites.</u></p> <p><u>P# - Provision of <del>diverse</del> housing types for an ageing population</u></p> <p><u>1. Provide for a diverse range of housing <del>and care</del> options that are <del>suitable</del> <del>the particular needs and characteristics of older persons in</del></u></p>	
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						<p><del>the medium density residential zone, such as retirement villages.</del></p> <p><del>2. Recognise the functional and operational needs of retirement villages, including that they:</del></p> <p><del>a. May require greater density than the planned urban built character to enable efficient provision of services.</del></p> <p><del>b. Have unique layout and internal amenity needs to cater for the requirements of residents as they age.</del></p> <p><u>P# Role of density standards</u></p> <p><u>Enable the density standards to be utilised as a baseline for the assessment of effects of developments.</u></p>	
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**Appendix B – Further Submission – Lodged 7 August 2023**

## **Further Submission on the notified proposed Timaru District Plan by Kāinga Ora – Homes and Communities**

### **Clause 8 of Schedule 1 to the Resource Management Act 1991**

**To:** PLANNING AND POLICY TEAM  
Timaru District Council  
PO Box 522,  
Timaru  
*Submitted via email to: [pdp@timdc.govt.nz](mailto:pdp@timdc.govt.nz)*

**Name of Further Submitter:** Kāinga Ora – Homes and Communities

1. **Kāinga Ora – Homes and Communities** (“**Kāinga Ora**”) makes this further submission on the **Proposed Timaru District Plan** (“**PTDP**”) in support of/in opposition to original submissions to the **PTDP**.
2. Kāinga Ora has an interest in the PTDP that is greater than the interest the general public has, being an original submitter on the PTDP with respect to its interests as Crown entity responsible for the provision of public housing, and its housing portfolio in the Timaru District.
3. Kāinga Ora makes this further submission in respect of submissions by third parties to the PTDP.

#### **Reasons for further submission**

4. The submissions that Kāinga Ora supports or opposes are set out in the table attached as **Appendix A** to this further submission.
5. The reasons for this further submission are:
  - (a) The reasons set out in the Kāinga Ora primary submission on the PTDP.

- (b) In the case of the Primary Submissions that are opposed:
- (i) The Primary Submissions do not promote the sustainable management of natural and physical resources and are otherwise inconsistent with the purpose and principles of the Resource Management Act 1991 ("**RMA**");
  - (ii) The relief sought in the Primary Submissions is not the most appropriate in terms of section 32 of the RMA;
  - (iii) Rejecting the relief sought in the Primary Submissions opposed would more fully serve the statutory purpose than would implementing that relief; and
  - (iv) The Primary Submissions are inconsistent with the policy intent of the Kāinga Ora primary submission.
- (c) In the case of Primary Submissions that are supported:
- (i) The Primary Submissions promote the sustainable management of natural and physical resources and are consistent with the purpose and principles of the RMA and with section 32 of the RMA;
  - (ii) The reasons set out in the Primary Submissions; and
  - (iii) Allowing the relief sought in the Primary Submissions supported would more fully serve the statutory purpose than would disallowing that relief.
6. Without limiting the generality of the above, the specific relief in respect of each Primary Submission that is supported or opposed is set out in **Appendix A**.
7. Kāinga Ora wishes to be heard in support of its further submission.
8. If others make a similar submission, Kāinga Ora will consider presenting a joint case with them at a hearing.

**DATED 4 August 2023**

**Kāinga Ora – Homes and Communities**



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**Brendon Liggett**

**Manager – Development Planning**

**ADDRESS FOR SERVICE:**

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*Attention: Development Planning Team*

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## Appendix A – Further Submission Table

Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
NOISE-S6  Noise from aircraft operations	Gemma Oliver	14.1	Amend	<p>Considers the noise levels used in Table 24 - Part 1 are from the previous Standards NZS 6801:1999 Acoustics - Measurement of Environmental Sound and assessed in accordance with NZS 6802:1991 Assessment of Environmental Sound. This could be a typo. But NOISE-S1 uses the 2008 version.</p> <p>NZS 6802 suggests a guideline daytime noise limit of 55 dB LAeq(15 minute) (approximately 57 dB LA10) and a night-time noise limit of 45 dB LAeq(15 minute) (approximately 47 dB LA10) for “the reasonable protection of health and amenity associated with the use of land for residential purposes”.</p> <p>[Refer to original submission for full reasons].</p> <p>Relief Sought: Amend Table 24.1 the noise limit daytime figure for residential, open spaces, rural lifestyle and settlement zones from 50 to 55 dB LAeq (15 min) daytime figure used as per NZS 6802:2008 recommended standards.</p>	Support in part	Consistent with the Kāinga Ora submission, Kāinga Ora support alignment with the most up to date noise standards.	Allow
EW-S1 - Earthworks	Karton and Hollamby Group Ltd T/A Stonewood Homes South Canterbury Ltd	31.1	Amend	<p>Considers the 250sqm earthworks limitation per site per 12 month is not enough for GRZ or MRZ.</p> <p>Relief sought: Amend EW-S1.2 Areas for GRZ &amp; MDRZ by increasing earthwork areas to at least 350sqm per site per 12 month period.</p>	Support	Kāinga Ora consider the proposed limit within this submission point appropriate when coupled with sufficient sediment and erosion measures.	Allow
Definitions  “Regionally Significant Infrastructure”	Timaru District Council	42.1	Amend	<p>Considers that National Routes and Principal Roads are Regionally Significant Infrastructure.</p> <p>Relief sought: Amend the definition of Regionally Significant Infrastructure as follows: <i>a. <del>Strategic land transport network</del> National Routes, Principal Roads, and arterial roads</i> <i>b. Timaru Airport</i> [...]</p>	Oppose	The definition must be consistent with the Regional Plan definition.	Disallow
Definitions  (new)  “Well-functioning	Timaru District Council	42.7	Amend	<p>The definition of ‘well-functioning urban environment’ from the NPS-UD should be included as it is a term used in the Future Development Area chapter.</p> <p>Relief sought: Add new definition of Well-Functioning Urban Environment as follows: <i>has the same meaning as in clause 1.4 of the National Policy Statement Urban Development (NPSUD) 2020: well-functioning urban environment has the meaning in Policy 1. Policy 1 of NPSUD states: Planning decisions contribute to well-functioning urban</i></p>	Support	Kāinga Ora support alignment with the NPS-UD.	Allow

Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Urban Environments"				<i>environments, which are urban environments that, as a minimum: (a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and (ii) enable Māori to express their cultural traditions and norms; and (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and (e) support reductions in greenhouse gas emissions; and (f) are resilient to the likely current and future effects of climate change.</i>			
UFD - Urban Form and Development  UFD-O1 Settlement Patterns	Timaru District Council	42.13	Amend	Support the objective, particularly clause (iv) which is consistent with the directives of Objective SD-O8. However, it considers a minor amendment to clause (ii) of UFD-O2 is warranted as the notified version of the clause appears to be incomplete. Inclusion of the word "co-ordinated" with respect to infrastructure is also considered appropriate to ensure consistency of terminology across the PDP (as noted in earlier submission points).  Relief sought: Amend UFD-O1 as follows: <i>A consolidated and integrated settlement pattern that:</i> [...] <i>ii. is integrated and co-ordinated with, and ensures the efficient use of, infrastructure;</i> [...]	Support in part	Consistent with the Kāinga Ora submission, Kāinga Ora supports the additional wording to strengthen the objective.	Allow
EI - Energy and Infrastructure	Timaru District Council	42.14	Amend	Considers there is an inconsistent use of terminology in the EI section. For example, the objectives and policies refer to regionally significant infrastructure, lifelines utilities and other infrastructure. However, the implementing rules and standards refer to infrastructure and network utilities interchangeably. Greater certainty is required for plan users.  Relief sought: Amend this section to provide consistent terminology, in particular what rules apply to 'network utilities' and/or 'infrastructure'.	Support in part	Consistent with the Kāinga Ora submission, Kāinga Ora supports consistent terminology through the proposed plan to provide ease of plan use.	Allow
EI - Energy and Infrastructure  EI-P1 Recognising the benefits of	Timaru District Council	42.18	Amend	Submits that during emergencies there are likely to be situations arising where infrastructure may not need to be removed, but it may be necessary for infrastructure to be altered. Subject to this minor amendment, D&W considers Policy EI-P1 will, in terms of section 75(1) RMA, implement Objective EI-O1.  Relief sought: Amend Policy E1-P1 as follows: <i>Recognise the benefits of Regionally Significant Infrastructure and Lifelines Utilities by:</i>	Support	Kāinga Ora supports the additions to provide for <i>relocation, repair, upgrade, maintenance and other necessary works required during an emergency</i> on Regionally Significant Infrastructure and Lifelines Utilities.	Allow

Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Regionally Significant Infrastructure and Lifeline Utilities				[...] 2. <u>enabling their removal, relocation, repair, upgrade, maintenance and other necessary works required during an emergency; and</u> [...]			
EI - Energy and Infrastructure  EI-P2 Managing adverse effects of Regionally Significant infrastructure and other infrastructure	Timaru District Council	42.19	Amend	Related to submission on Objective EI-O2. Considers Policy E1-P2 should be to cover the situation where there are no alternative sites, routes or methods for the proposed infrastructure, e.g., due to design or locational constraints. With the abovementioned amendments, D&W consider that Policy EI-P2 would, in terms of section 75(1) RMA, implement Objective EI-O2.  Relief sought: Amend EI-P2.2 to include a further sub-clause such as "the extent to which viable alternative sites, routes or methods are available" or similar. OR amend wording of clause a.	Support	Kāinga Ora support the intention of the submission and consider that the a further addition to the clause should be included:	
NH - Natural Hazards  NH-R4 Natural hazard sensitive activities or structures and additions to such activities or structures with a ground	Timaru District Council	42.31	Amend	Considers the title of NH-R4 is unclear as it does not specifically exclude Regionally Significant Infrastructure, as NH-R7 does. Potentially NH-R4 would be better located after NH-R7, as the two rules relate to similar activities and are currently separated by rules applying to Regionally Significant Infrastructure.  Relief sought: Amend the title of NH-R4 as follows: <i>NH-R4 Natural Hazard sensitive activities or structures and additions to such activities or structures with a ground floor area of 30m2 or more (excluding Regionally Significant Infrastructure)</i> AND Consider reordering the provisions so that NH-R7 and NH-R4 are one after the other, as they relate to similar activities. AND Any consequential or additional amendments that may be required to NH-O2 and NH-P11.	Support in part	Kāinga Ora support the exclusion of regionally significant infrastructure insofar as the changes are consistent with its original submission.	Allow



Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
floor area of 30M <sup>2</sup> or more							
FC – Financial Contribution  FC-O1 Funding Timaru District's infrastructure	Timaru District Council	42.43	Amend	<p>Considers this Objective is incomplete, and as such, does not convey the intended meaning, which is essential to ensure alignment with policies and rules of this Chapter, as required by section 75(1) RMA.</p> <p>Relief sought: Amend FC-O1 to ensure alignment with policies and rules of this chapter.</p>	Support in Part	<p>Where consistent with the Kāinga Ora submission, Kāinga Ora supports and understands the need for Financial Contributions (FC) as a tool or mechanism to enable Council to take monetary contributions at the time of development to pay for (or mitigate) the additional effects/ demand of a development and that are not already programmed to be undertaken through Council's Long-Term Plan (and are therefore already funded through rates). However, Kāinga Ora has a number of concerns as identified in the front section of this submission about the lack of clarity and certainty as to the costs of FC to developers. There needs to be greater transparency about costs and how these will be calculated and proportioned, and greater clarity in how FC will be implemented.</p>	Allow
CCZ - City Centre Zone  General	Timaru District Council	42.48	Amend	<p>At the time of the Draft Plan, the submitter believed that the Southern Centre Precinct should be more favourable for ground floor residential uses, the recent residential study suggest that residential development in other areas may also be appropriate. Therefore, they are investigating other areas where this form of development would be appropriate. As a result, the current Precinct may not be the correct tool as it implies that only this area is suitable for terrace housing.</p> <p>Further to this, allowing ground floor residential development as a permitted activity without proper control in this area may reduce the quality and confidence of investment in the area as a characterful precinct for urban living.</p> <p>Relief sought: Delete the Southern Centre Precinct from the PDP provisions and maps; AND Note that a future variation to the PDP will most likely seek to amend the wider objectives, policies and rules of the CCZ to incorporate wording that makes ground floor residential uses discretionary when: there are good urban design outcomes; good quality residential spaces; development does not detract from existing continuous retail frontages; and they are designed along street frontages to accommodate future commercial uses. Discretion should be applied to ground floor access to first floor residential spaces in retail areas that is sympathetic to surrounding retail uses in order to create good street legibility for these units. A design guide will be created also, that will bring clarity to how these outcomes should be achieved; AND If accepted, there are consequential amendments required to other</p>	Support in part	<p>Where consistent with the Kāinga Ora submission, Kāinga Ora supports residential units at first floor and above and supports residential units outside of the Southern Centre Precinct.</p>	Allow

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				parts of the Plan including, the introduction (PREC2); CCZ-P4; CCZ-R5; CCZ-R6 which all make reference to the Southern City Precinct.			
Planning Maps  Southern Centre Precinct  Precinct	Timaru District Council	42.49	Amend	Submits that the Southern Centre Precinct was to establish an area more favourable for ground floor residential uses. However, there is wider potential within the CCZ where this form of development would be appropriate. This will continue to be investigated during the City Town masterplan process.  Relief sought: Delete the Southern Centre Precinct from the PDP provisions and maps.	Support	Where consistent with the Kāinga Ora submission, Kāinga Ora supports residential units outside of the Southern Centre Precinct.	Allow
CCZ – City Centre Zone  Introduction	Timaru District Council	42.50	Amend	Submits that the Southern Centre Precinct was to establish an area more favourable for ground floor residential uses. However, there is wider potential within the CCZ where this form of development would be appropriate. This will continue to be investigated during the City Town masterplan process.  Relief sought: Amend the Introduction to the CCZ - City Centre Zone Chapter as follows: <i>Introduction</i> <i>The City Centre Zone is applied to Timaru’s central city area and is the key commercial and civic centre for the District and wider South Canterbury sub-region. [...].</i> <i>[...]</i> <del><i>PREC2 – Southern Centre Precinct provides more of a transition into the Mixed Use Zone, with less emphasis on provision of ground floor retail and more opportunity for a mix of development, including live and work options, where it still maintains the streetscape.</i></del>	Support	Where consistent with the Kāinga Ora submission, Kāinga Ora supports residential units outside of the Southern Centre Precinct.	Allow
CCZ – City Centre Zone  CCZ-P4 Streetscape and character	Timaru District Council	42.51	Amend	Submits that the Southern Centre Precinct was to establish an area more favourable for ground floor residential uses. However, there is wider potential within the CCZ where this form of development would be appropriate. This will continue to be investigated during the City Town masterplan process.  Relief sought: Amend CCZ-P4 as follows: <i>Maintain or enhance the values associated with scheduled heritage items and historic heritage areas and the amenity values of high-quality streetscape, by requiring:</i> <i>1. a verandah in key pedestrian areas that is designed to maintain or enhance the character of the street and provide a pleasant pedestrian-focused environment;</i>	Support	Where consistent with the Kāinga Ora submission, Kāinga Ora supports residential units outside of the Southern Centre Precinct.	Allow

Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)									
				<p>2. buildings to generally be built up to road boundaries; and</p> <p>3. buildings to have an active street frontage at ground floor level <del>(excluding the PREC2 – Southern Centre Precinct)</del> to reflect the retail nature and focus of this area; and</p> <p>[...]</p>												
CCZ – City Centre Zone  CCZ-R5 Residential activity (not listed in this chapter)	Tlmaru District Council	42.52	Amend	<p>Submits that the Southern Centre Precinct was to establish an area more favourable for ground floor residential uses. However, there is wider potential within the CCZ where this form of development would be appropriate. This will continue to be investigated during the City Town masterplan process.</p> <p>Relief sought:</p> <table border="1"> <tr> <td>CCZ-R5</td> <td>Residential Activity (not listed in this chapter)</td> <td></td> </tr> <tr> <td>Outside of the Southern Centre Precinct City Centre Zone</td> <td>           Activity Status: Permitted             Where:            PER-1            The residential activity is undertaken within a residential unit that is:            located above the ground floor level of a building; or            is located at ground floor level and the residential unit was existing as at 22 September 2022; and            PER-2            CCZ-S2, CCZ-S5 and CCZ-S6 is complied with.            Note: Any associated building and structure must be constructed in accordance with CCZ- R7.         </td> <td>Activity Status where compliance not achieved with PER-1: Discretionary</td> </tr> <tr> <td>Southern Centre Precinct</td> <td>           Activity status: Permitted             Where:            PER-1         </td> <td>Activity Status where compliance not achieved: Restricted</td> </tr> </table>	CCZ-R5	Residential Activity (not listed in this chapter)		Outside of the Southern Centre Precinct City Centre Zone	Activity Status: Permitted  Where: PER-1 The residential activity is undertaken within a residential unit that is: located above the ground floor level of a building; or is located at ground floor level and the residential unit was existing as at 22 September 2022; and PER-2 CCZ-S2, CCZ-S5 and CCZ-S6 is complied with. Note: Any associated building and structure must be constructed in accordance with CCZ- R7.	Activity Status where compliance not achieved with PER-1: Discretionary	Southern Centre Precinct	Activity status: Permitted  Where: PER-1	Activity Status where compliance not achieved: Restricted	Support	Where consistent with the Kāinga Ora submission, Kāinga Ora supports residential units outside of the Southern Centre Precinct.	Allow
CCZ-R5	Residential Activity (not listed in this chapter)															
Outside of the Southern Centre Precinct City Centre Zone	Activity Status: Permitted  Where: PER-1 The residential activity is undertaken within a residential unit that is: located above the ground floor level of a building; or is located at ground floor level and the residential unit was existing as at 22 September 2022; and PER-2 CCZ-S2, CCZ-S5 and CCZ-S6 is complied with. Note: Any associated building and structure must be constructed in accordance with CCZ- R7.	Activity Status where compliance not achieved with PER-1: Discretionary														
Southern Centre Precinct	Activity status: Permitted  Where: PER-1	Activity Status where compliance not achieved: Restricted														

Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				<p><i>CCZ-S2, CCZ-S5 and CCZ-S6 is complied with. Note: Any associated building and structure must be constructed in accordance with CCZ-R6, CCZ-R7, and CCZ-R8.</i></p> <p><i>Discretionary Where: Matters of Discretion are restricted to: The matters of discretion of any infringed standard.</i></p>			
CCZ – City Centre Zone  CCZ-R6 Demolition of any buildings	Timaru District Council	42.53	Amend	<p>Submits that the Southern Centre Precinct was to establish an area more favourable for ground floor residential uses. However, there is wider potential within the CCZ where this form of development would be appropriate. This will continue to be investigated during the City Town masterplan process.</p> <p>Relief sought: Amend CCZ-R6 as follows: CCZ-R6 Demolition of any buildings <del>City Centre Zone outside of Southern Centre Precinct.</del></p>	Support	Where consistent with the Kāinga Ora submission, Kāinga Ora supports residential units outside of the Southern Centre Precinct.	Allow
CCZ – City Centre Zone  CCZ-R7 Buildings and structures	Timaru District Plan	42.54	Amend	<p>Notes that CCZ-R7.7 seeks buildings within the CCZ Southern Centre Precinct are designed to provide a good quality living environment whilst also enabling future conversion to future uses. Whilst the intent of this remains, this principle is not specific to the Southern Centre Precinct.</p> <p>Relief sought: Amend CCZ-R7.7 Buildings and Structures as follows: Activity status: Controlled Where: [...] Matters of control are restricted to: 1. compatibility of the form, scale and architectural design of the building with the streetscape values identified in CCZ-P4 and any adjoining scheduled heritage item(s) or historic heritage area; and [...] <del>7. within the Southern centre precinct,</del> whether the building is suitably designed to provide a good quality living environment while also enabling future conversion to future uses, such as through: [...].</p>	Support	Where consistent with the Kāinga Ora submission, Kāinga Ora supports residential units outside of the Southern Centre Precinct.	Allow
CCZ – City Centre Zone  CCZ-S4 Active street frontage	Timaru District Plan	42.55	Amend	<p>As outlined in other submission points, it is requested that the reference to the Southern Centre Precinct is deleted from the PDP at this stage. Additionally, CCZ-S4 (2) is considered restrictive in that it may prevent vehicle crossings servicing access lanes to townhouse developments on quieter central city roads.</p> <p>Relief sought: Amend CCZ-S4 as follows:</p>	Support	Where consistent with the Kāinga Ora submission, Kāinga Ora supports residential units outside of the Southern Centre Precinct.	Allow

Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				<p>1. <del>Except for residential activities within the Southern Centre Precinct,</del> all new buildings shall be built up to the street frontage; <u>and</u></p> <p>2. there must be no vehicle crossings across footpaths. or pedestrian areas [...] <u>and</u></p> <p>3. for new buildings, at least 60% (by length) of the façade of the ground floor of a building where the facade fronts the road or other public area must contain windows, <u>and</u></p> <p>4. <del>Except for residential activities within the Southern Centre Precinct,</del> any windows located on the ground floor of a building where the facade fronts the road or other public area must remain visually transparent and be used either for the display of goods and services; or kept clear of obstructions to provide a view into the building.</p>			
Planning Maps Specific Control Area Grey Road/ Arthur Street - Potential Large Scale Retail, Specific Control Area	Timaru District Council	42.72	Amend	<p>The PDP mistakenly includes within the maps the Specific Control Area over a site on Grey Road/Arthur Street in central Timaru. This area is not required and does not feature within the PDP provisions.</p> <p>Relief sought: Delete the Grey Road/Arthur Street - Potential Large-Scale Retail, Specific Control Area from the map.</p>	Support	Kāinga Ora supports this change to rectify an error.	Allow
Definitions “Regionally Significant Infrastructure”	Alpine Energy Limited	55.1	Amend	<p>Considers there is an omission in the definition, as national, regional, and local renewable electricity generation, and the transmission network are included within the definition of regionally significant infrastructure, but the electricity distribution network is not.</p> <p>Relief sought: Amend the definition of Regionally Significant Infrastructure as follows: a [...] <i>l. Bulk fuel supply infrastructure including terminals, wharf lines and pipelines.</i> <i>m. the regional electricity distribution network.</i></p>	Oppose	The definition should be consistent with the RPS definition.	Disallow
Definitions “Boundary Adjustment”	Milward Finlay Lobb	60.2	Amend	<p>Amend definition of Boundary Adjustment as follows: <i>means a subdivision that alters the existing boundaries between adjoining allotments, without altering the number of allotments of two or more contiguous sites where the site boundaries are amended, altering the size and/or shape of the existing sites.</i></p>	Oppose	The changes to the definition are not in line with the National Planning Standards.	Disallow

Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Definitions "Building"	Milward Finlay Lobb	60.3	Amend	<p>Considers the proposed definition will include water tanks, also there is no height or gross floor area maximum and/or minimum specified so therefore every structure is classed as a building - tanks, garden sheds, glasshouses etc. It is also not clear what the status of retaining walls is.</p> <p>Relief sought: 1. Amend definition of Building as follows: <i>means a temporary or permanent movable or immovable physical construction that is:</i> <i>a. partially or fully roofed; and</i> <i>b. is fixed or located on or in land;</i> <i>but excludes any motorised vehicle or other mode of transport that could be moved under its own power or water tank/s.</i> 2. Furthermore, to include an additional parameters around definition of building.</p>	Oppose	The changes to the definition are not in line with the National Planning Standards.	Disallow
SUB – Subdivision SUB-S1 Allotment sizes and dimensions	Milward Finlay Lobb	60.27	Amend	<p>Oppose to SUB-S1.1 GRZ where sites that unable to accommodate a 15m diameter circle be classified as a Non-Complying activity.</p> <p>Relief sought: Amend SUB-S1 Allotment sizes and dimensions with following changes: 1. For General Residential Zone (SUB-S1.1): a. Amend the required minimum dimension under subclause 2 from 15m to 13m; and b. Amend the activity status for allotments that is unable to comply with the 13m dimension from Non-Complying to Discretionary.</p>	Support in part	Where consistent with the Kāinga Ora submission, Kāinga Ora support the change in activity status.	Allow in part
SUB – Subdivision SUB-R1 Boundary adjustment	Bruce Speirs	35.56	Amend	<p>Considers the move from a Controlled activity to a Non-Complying activity is too extreme where there is only one standard that is not complied with.</p> <p>Relief sought: Amend SUB-R1 Boundary adjustment as follows: <i>Boundary adjustment</i> <i>Activity status: Controlled</i> <i>Where:</i> <i>CON-1</i> <i>SUB-S1 is complied with; and</i> <i>[...]</i> <i>Activity status when compliance not achieved with CON-1: Non-complying-Discretionary</i></p>	Support	Where consistent with the Kāinga Ora submission, Kāinga Ora support the change in activity status.	Allow
SUB – Subdivision SUB-R3 Subdivision not	Bruce Speirs	66.57	Amend	<p>Considers the move from Restricted Discretionary to Non-Complying is too extreme where there is only one standard is not complied with.</p> <p>Relief sought: Amend SUB-R3 Subdivision not listed in SUB-R1 and SUB-R2 as follows: <i>Activity status: Restricted Discretionary</i></p>	Support	Where consistent with the Kāinga Ora submission, Kāinga Ora support the change in activity status. Noting that the drafting of the rule is unclear. As drafted, the rule reads that subdivision in accordance with SUB-S2-SUB-S7 is Restricted Discretionary, however if SUB-S2-SUB-S7 are not complied with, the activity is still Restricted Discretionary.	Allow



Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
listed in SUB-R1 and SUB-R2				<p>Where:  RDIS-1  SUB-S2 - SUB-S7 are complied with; and  RDIS-2 SUB-S1 is complied with.  [...]  Activity status when compliance not achieved with RDIS-2: <del>Non-complying</del> <u>Discretionary</u></p>			
UFD - Urban Form and Development  UFD-O1 Settlement Patterns	Ministry of Education	106.7	Amend	<p>Consider explicit provision is given to educational facilities throughout the District in urban development to manage the impacts of development on educational facilities, in particular impacts on school capacity. Council has an obligation under the National Policy Statement for Urban Development (NPS-UD) to ensure sufficient additional infrastructure (which includes schools) is provided in urban growth and development (see Policy 10 and 3.5 of Subpart 1 of Part 3: Implementation, in particular).</p> <p>Relief sought:  Amend UFD-O1 Settlement Patterns as follows:  <i>UFD-O1 Settlement Patterns</i>  A consolidated and integrated settlement pattern that:  i. efficiently accommodates future growth and capacity for commercial, industrial, community, educational and residential activities, primarily within the urban areas of the Timaru township, and the existing townships of Temuka, Geraldine, and Pleasant Point;  [...]</p>	Support	Kāinga Ora supports the addition of educational activities to be provided as part new developments and settlement patterns.	Allow
SUB - Subdivision  SUB-O1 General subdivision design	Ministry of Education	106.12	Amend	<p>Support this policy as it ensures that subdivisions are serviced by the required infrastructure, requests that specific provision for educational facilities is provided to ensure that population growth and the impact on schools is considered within developments.</p> <p>Relief sought:  Amend SUB-O1 General subdivision design as follows:  <i>New subdivisions will:</i>  [...]  6. respond appropriately to hazards, risks and site constraints; and  7. have infrastructure and facilities appropriate for the intended use including educational facilities; and  8. have minimal adverse effects on regional significant infrastructure or intensive primary production; and  [...]</p>	Oppose	Kāinga Ora considers that the proposed changes haven't considered the scale of subdivision, nor location and does not consider the inclusion of educational facilities within the objective is appropriate for the intended outcome of sub clause 7.	Disallow
NCZ - Neighbourhood Centre Zone	Ministry of Education	106.33	Amend	<p>Considers a new rule is required to provide educational facilities in the Neighbourhood Centre Zone, particularly early childhood centres and schools, where there is potential for a population to support them as they are considered essential social infrastructure and will support active modes of transport and reduce trip lengths and times. Accordingly, requests an activity status of Permitted and Restricted Discretionary for educational facilities in the Neighbourhood Centre</p>	Oppose	Kāinga Ora considers that a permitted activity status for educational facilities within a Neighbourhood Centre zone is too permissive given the smaller scale of such centres which are areas used predominantly for small-scale commercial and community activities that service the needs of the immediate residential neighbourhood.	Disallow

Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
(new) Rule				<p>Zone.</p> <p>Relief sought:            Add a new rule as follows:  <u>NCZ-R* Education facility</u>  <u>Activity status: Permitted</u>  <u>Where:</u>  <u>PER-1</u>  <u>All the Standards of this chapter are complied with.</u>  <u>Activity status where compliance not achieved with PER-1:</u>  <u>Restricted discretionary</u>  <u>Matters of control are restricted to:</u>  <u>1. the location and design of buildings and any proposed car parking and loading areas and access; and</u>  <u>2. hours of operation; and</u>  <u>3. noise, disturbance and loss of privacy of neighbours; and</u>  <u>screening and landscaping; and waste treatment and disposal.</u></p>			
CE - Coastal Environment  CE-P12 Coastal Hazard Areas (excluding Regional Significant Infrastructure)	Lineage Logistics NZ Limited	107.8	Oppose	<p>Opposes this CE-P12.2 as Considers it is inconsistent with Section 6 (h) of the Act, which refers to the management of significant risks. However, CE-P12 request avoid increase of any risk, even de minimus or temporary.</p> <p>Relief sought:            1. Delete Policy CE-P12.2 and replace with wording that focuses on unacceptable risk.            2. Such other alternative or additional relief as may be appropriate to give effect to the intent of this submission including, but not limited to, amendments to implementing rules in CE-R4 - CE-R14 and associated standards.</p>	Support	Kāinga Ora supports the intent of the submission where consistent with the NZCPS.	Allow
HH - Historic Heritage  HH-P8 Demolition of Category B Historic Heritage Items	Heritage New Zealand Pouhere Taonga	114.20	Amend	<p>Considers section (6)(f), the RMA identifies the protection of historic heritage as a matter of national importance. The impact of demolition of a heritage item is irreversible and as more heritage buildings are lost, we increasingly lose touch with the history and origins of our surroundings. Today's heritage items are tangible remains of the district's rich and unique history. It is therefore recommended that this policy is strengthened to enable a greater level of protection.</p> <p>Relief sought:            Amend HH-P8 as follows:  <u>HH-P8 Demolition of Category B Historic Heritage Items</u>  <u>Only allow demolition of a Category B Historic Heritage Item identified in SCHED3 - Schedule of Historic Heritage Items where it can be demonstrated that:</u>  <u>1. there is a threat to life and/or property which cannot be removed or reduced by interim protection measures; or</u></p>	Oppose	Kāinga Ora opposes the deletion of clause 3 as this is an appropriate consideration when assessing the demolition of <i>Category B Historic Heritage Items</i> .	Disallow



Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				<p>2. the extent of the work required to retain and/or repair the item is of such a scale that the heritage values and integrity of the item would not be significantly compromised; or</p> <p>3. the cost of remedying any disrepair or threat to life and/or property is prohibitive; or</p> <p>4. the item can be demolished in part without adversely affecting the heritage values for which it was scheduled.</p>			
MRZ - Medium Density Residential Zone  MRZ-R2 Residential units	Heritage New Zealand Pouhere Taonga	114.38	Amend	<p>Concerned about the cumulative impact of permitted intensification in the vicinity of a heritage item. Further thought is required as to the impact of intensification adjacent to historic heritage items, and an alternative approach considered which enables development where appropriate but does not diminish Timaru's valuable heritage resources.</p> <p>Relief sought: Requests further consideration as to the impact of intensification adjacent to historic heritage items, and promote an alternative approach which provides relevant controls to enable development where appropriate without diminishing Timaru's valuable heritage resources.</p>	Oppose	Kāinga Ora consider that this matter is adequately provided for within the Historic Heritage Chapter.	Disallow
TRAN – Transport  TRAN-S10 Vehicle access way requirements	Fire and Emergency New Zealand	131.7	Amend	<p>The submitter needs to be able to reach buildings with their different vehicles in a fire or other emergency. Carriageways therefore need to be wide enough to allow emergency vehicles to get through them easily and to allow emergency personnel to carry out emergency operations.</p> <p>Relief sought: Amend TRAN-S10 to include the following amendment under Table 15: <i>Table 15 - Vehicle access way requirements [...]</i> *[...] **[...] *** <u>The vehicle access point complies with the dimensions required for fire appliances for developments in SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice where a driveway length exceeds 75m or a fire appliance is not able to reach the source of a firefighting water supply from a public road.</u></p>	Support in part	Kāinga Ora support the intention of the submission, but consider that appropriate widths should be provided rather than referral to the New Zealand Fire Service Firefighting Water Supplies Code of Practice.	Allow in part
GRZ - General Residential Zone  (new) Policy	Fire and Emergency New Zealand	131.18	Amend	<p>Seeks a new policy that ensures all land use activities in the General Residential Zone are adequately serviced, particularly in relation to firefighting water supply.</p> <p>Relief sought: Add a new policy to GRZ General Residential Zone as follows: <u>GRZ-P6 Ensure all land use activities and developments are connected to the public reticulated wastewater, stormwater, and water supply network unless an approved alternative system is available.</u></p>	Oppose	This matter is adequately addressed within the Energy and Infrastructure chapter.	Disallow

Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
GRZ - General Residential Zone	Fire and Emergency New Zealand	131.19	Amend	<p>A new standard is requested in the GRZ - General Residential Zone chapter to require the provision of firefighting water supply where development is not subject to subdivision. This new standard will better give effect to new proposed policy GRZ-P6 sought by Fire and Emergency. The submitter request that GRZ-R1, GRZ-R2, GRZ-R3, GRZ-R5, GRZ-R6, GRZ-R9 and GRZ-R11 be amended to require compliance with the new standard.</p> <p>Relief sought: Amend GRZ-R1, GRZ-R2, GRZ-R3, GRZ-R5, GRZ-R6, GRZ-R9 and GRZ-R11 to require compliance with new standard: <i>Where the following conditions are met:</i> <i>Compliance with:</i> <i>x. GRZ-S12</i> <i>[...]</i></p>	Oppose	This matter is provided for within the building consent process.	Disallow
GRZ - General Residential Zone	Fire and Emergency New Zealand	131.25	Amend	<p>New standard is requested in the GRZ requiring the provision of firefighting water supply for activities (such as the construction of a new residential dwelling) not subject to subdivision rules.</p> <p>Relief sought: Add new GRZ - General Residential Zone standard as follows: <u>GRZ-S12 Servicing</u> <u>1. All new developments that will require a water supply must be connected to a public reticulated water supply, where one is available.</u> <u>2. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot. This includes potable and firefighting water supply. Note: Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u></p>	Oppose	This matter is provided for within the building consent process.	Disallow
MRZ - Medium Density Residential Zone	Fire and Emergency New Zealand	131.27	Amend	<p>Supports subject to the inclusion of a new standard MRZ-S11 that requires these activities to provide a firefighting water supply. The submitter requests that MRZ-R1, MRZ-R2, MRZ-R3, MRZ-R4 and MRZ-R5 be amended to require compliance with the new standard.</p> <p>Relief sought: Amend MRZ-R1, MRZ-R2, MRZ-R3, MRZ-R4 and MRZ-R5 to require compliance with the new standard: <i>Where the following conditions are met:</i> <i>Compliance with:</i> <i>x. MRZ-S11</i> <i>[...]</i></p>	Oppose	This matter is provided for within the building consent process.	Disallow

Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
MRZ - Medium Density Residential Zone (new) Standard	Fire and Emergency New Zealand	131.33	Amend	<p>A new standard is requested in the requiring the provision of firefighting water supply for activities (such as the construction of a new residential dwelling) not subject to subdivision.</p> <p>Relief sought:  Add new MRZ - Medium Density Residential Zone standard as follows:  <u>MRZ-S11 Servicing</u>  <u>1. All new developments that will require a water supply must be connected to a public reticulated water supply, where one is available.</u>  <u>2. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot.</u>  <u>Note: Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u></p>	Oppose	This matter is provided for within the building consent process.	Disallow
NCZ - Neighbourhood Centre Zone (new)	Fire and Emergency New Zealand	131.74	Amend	<p>A new standard is requested in the NCZ requiring the provision of firefighting water supply for activities (such as the construction of a new residential dwelling) not subject to subdivision. This amendment will give effect to the new policy sought by Fire and Emergency (GRUZ-P10) and is consistent with the approach taken in SUB-S5.</p> <p>Relief sought:  Add new NCZ - Neighbourhood Centre Zone standard as follows:  <u>NCZ-S7 Servicing</u>  <u>1. All new developments that will require a water supply must be connected to a public reticulated water supply, where one is available.</u>  <u>2. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot.</u>  <u>Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u></p>	Oppose	This matter is provided for within the building consent process.	Disallow
LCZ - Local Centre Zone	Fire and Emergency New Zealand	131.77	Amend	<p>Supports in part LCZ-R2 subject to the inclusion of a new standard LCZ-S5 that requires these activities to provide a firefighting water supply.</p> <p>Relief sought:</p>	Oppose	This matter is provided for within the building consent process.	Disallow

Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				Amend LCZ-R2 and LCZ-R3 as follows: <u>LCZ-S5 Servicing</u> [...]			
LCZ - Local Centre Zone  (new) Standard	Fire and Emergency New Zealand	131.83	Amend	A new standard is requested in the LCZ requiring the provision of firefighting water supply for activities (such as the construction of a new residential dwelling) not subject to subdivision.  Relief sought: Add a new standard in LCZ - Local Centre Zone chapter as follows: <u>LCZ-S5 Servicing</u> <u>1. All new developments that will require a water supply must be connected to a public reticulated water supply, where one is available.</u> <u>2. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot.</u> <u>Note: Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u>	Oppose	This matter is provided for within the building consent process.	Disallow
MUZ - Mixed Use Zone	Fire and Emergency New Zealand	131.86	Amend	Supports in part MUZ-R1 subject to the inclusion of a new standard MUZ-S7 that requires these activities to provide a firefighting water supply.  Relief sought: Amend MUZ-R1, MUZ-R2, MUZ-R5, MUZ-R8 and MUZ-R10 as follows: <u>Compliance with:</u> <u>x. MUZ-S7 Servicing</u> [...]	Oppose	This matter is provided for within the building consent process.	Disallow
MUZ - Mixed Use Zone  (new) Standard	Fire and Emergency New Zealand	131.91	Amend	Submitter notes that SUB - Subdivision chapter includes rules and standards applying to subdivision. Therefore, activities that do not require subdivision in the Mixed-Use Zone will not be subject to the servicing standards within, including SUB-S3 that applies to the subdivision of new lots only and requires a water supply. A new standard is therefore requested in the MUZ - Mixed Use Zone chapter requiring the provision of firefighting water supply for activities (such as the construction of a new residential dwelling) not subject to subdivision.  Relief sought: Add a new standard in MUZ - Mixed Use Zone chapter as follows: <u>MUZ-S7 Servicing</u>	Oppose	This matter is provided for within the building consent process.	Disallow

Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				<p><u>1. All new developments that will require a water supply must be connected to a public reticulated water supply, where one is available.</u></p> <p><u>2. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot.</u></p> <p><u>Note: Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>			
TCZ - Town Centre Zone Rules	Fire and Emergency New Zealand	131.93	Amend	<p>Supports in part TCZ-R1 subject to the inclusion of a new standard TCZ-S8 that requires these activities to provide a firefighting water supply. An additional assessment matter is also sought. Where water supply servicing requirements cannot be met, this will provide council discretion as to the extent an activity is able to achieve compliance with the NZ Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</p> <p>Relief sought: Amend TCZ-R1, TCZ-R2, TCZ-R3, TCZ-R5 and TCZ-R6 as follows: <u>Compliance with:</u> <u>x.TCZ-S8 Servicing</u> <u>[...]</u></p>	Oppose	This matter is provided for within the building consent process.	Disallow
TCZ - Town Centre Zone (new) Standards	Fire and Emergency New Zealand	131.98	Amend	<p>Activities that do not require subdivision in the Mixed-Use Zone will not be subject to the servicing standards within, including SUB-S3 that applies to the subdivision of new lots only and requires a water supply.</p> <p>A new standard is therefore requested in the TCZ requiring the provision of firefighting water supply for activities (such as the construction of a new residential dwelling) not subject to subdivision. This new standard is consistent with the approach taken in SUB-S3.</p> <p>Relief sought: Add a new standard in the TCZ - Town Centre Zone chapter as follows: <u>TCZ-S7 Servicing</u> <u>1. All new developments that will require a water supply must be connected to a public reticulated water supply, where one is available.</u> <u>2. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot.</u> <u>Note: Further advice and information about how an alternative and</u></p>	Oppose	This matter is provided for within the building consent process.	Disallow



Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				<u>satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u>			
CCZ - City Centre Zone  Rules	Fire and Emergency New Zealand	131.101	Amend	Supports in part CCZ-R1, subject to the inclusion of a new standard CCZ-S7 that requires these activities to provide a firefighting water supply.  Relief sought: Amend CCZ-R1, CCZ-R2, CCZ-R3 and CCZ-R5 as follows: <u>Compliance with:</u> <u>x.CCZ-S7 Servicing</u> <u>[...]</u>	Oppose	This matter is provided for within the building consent process.	Disallow
CCZ - City Centre Zone  (new) Standard	Fire and Emergency New Zealand	131.102	Amend	Submitter notes that SUB - Subdivision chapter includes rules and standards applying to subdivision. Therefore, activities that do not require subdivision in the City Centre Zone will not be subject to the servicing standards within, including SUB-S3 that applies to the subdivision of new lots only and requires a water supply. A new standard is requested in the CCZ requiring the provision of firefighting water supply for activities (such as the construction of a new residential dwelling) not subject to subdivision. This new standard is consistent with the approach taken in SUB-S3.  Relief sought: Add a new standard in the CCZ - City Centre Zone as follows: <u>CCZ-S7 Servicing</u> <u>1. All new developments that will require a water supply must be connected to a public reticulated water supply, where one is available.</u> <u>2. Where the new development will not be connected to a public reticulated water supply, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply can be provided to each lot.</u> <u>Note: Further advice and information about how an alternative and satisfactory firefighting water supply can be provided to a development can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u>	Oppose	This matter is provided for within the building consent process.	Disallow
UFD - Urban Form and Development	Waka Kotahi NZ Transport Agency	143.19	Oppose	Acknowledges the objective seeks to achieve consolidated and integrated settlement pattern, which, the submitter supports. However, considers there is a contradiction between achieving this pattern and recognising the existing character of an area which is most likely to be low density residential development.  Relief sought: Amend UFD-O1 as follows:	Support	Kāinga Ora supports the deletion of recognising existing character and amenity and considers that the following amendment could be made to align with the NPS-UD:  <i>is well designed, of a good quality, recognises the planned built environment <del>existing character and amenity</del> and is attractive and functional to residents, business and visitors.</i>	Allow

Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
UFD-O1 Settlement Patterns				<p><i>UFD-O1 Settlement Patterns A consolidated and integrated settlement pattern that:</i>  <i>[...]</i>  <i>v. is well designed, of a good quality, recognises existing character and amenity and is attractive and functional to residents, business and visitors.</i>  <i>[...]</i></p>			
NOISE – Noise NOISE-O2 Reverse sensitivity	Waka Kotahi NZ Transport Agency	143.116	Amend	<p>Supports the intent of the policy as it recognises that the state highway should not be constrained by reverse sensitivity effects. However, protecting human health is considered to be the primary approach for managing reverse sensitivity effects. It is recommended that either the rule be amended to explicitly set out to protect human health for the noise sensitive activities in high noise environments</p> <p>Relief sought:  Amend NOISE-O2 as follows:  <i>NOISE-O2 Reverse sensitivity</i>  <i>Noise sensitive activities shall avoid reverse sensitivity effects to protect human health from noise generating activities such as the Airport, Raceway, State Highway, railway lines and the Port and activities located within commercial, mixed use and Industrial zones are not constrained by reverse sensitivity effects arising from noise sensitive activities.</i></p>	Oppose	Kāinga Ora opposes this relief, noting that the presence of infrastructure in proximity to residential areas does not, in and of itself, present a reverse sensitivity effect warranting additional controls or management.	Disallow
NOISE – Noise NOISE-R9 Any new building for use by a noise sensitive activity and alterations to existing buildings for use by a noise sensitive activity (not listed in NOISE-R12)	Waka Kotahi NZ Transport Agency	143.118	Amend	<p>Supports the intent of such a rule but seeks amendments to address reverse sensitive concerns with the state highway distances, PER-1, and parts of PER-2.</p> <p>An alternative option to consider is variable noise contours which could be implemented as a state highway noise control overlay. It is anticipated that these will be available by the further submission stage.</p> <p>Relief sought:  Amend NOISE-R9 by:  1. For the spatial area this rule applies in relation to State highway either:  a. increase the distance from the state highway in posted speeds of greater than 50km/h to 100m for State Highway 1; or  b. Use the variable noise contour approach which the submitter expect to introduce to Council as part of the further submission process.  AND  2. Exclude road noise from PER-1.2.  AND  3. Amend PER-2.b to replace '20m' with '50m'.</p>	Oppose	Consistent with the Kāinga Ora submission, Kāinga Ora consider that there is no evidence of reverse sensitivity affecting the state highway network.	Disallow

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NOISE – Noise NOISE-S3 Acoustic insulation	Waka Kotahi NZ Transport Agency	143.119	Amend	<p>As per the submission point on NOISE-R9 - PER-1, there is concern over the approach used. It is recommended that the standard be updated to reflect the resulting noise inside of a habitable space as it is an effects based approach. There is also concern that the matters of discretion provide allowance for non-compliance without addressing the adverse effect.</p> <p>In addition to above, vibration and outdoor noise have not been recognised within this standard. These additional factors that could have an impact on human health unless reverse sensitivity is appropriately addressed.</p> <p>Relief sought: Amend NOISE-S3 as follows: 1. Remove road-traffic from NOISE-S3.1 AND 2. Insert a new section as NOISE-S.3 requiring internal levels in habitable rooms of 40 dB LAeq(24h), external levels of 57 dB LAeq(24h) in outdoor living spaces, and within 20m of a state highway vibration limit of 0.3 mm/s vw95. AND 3. Insert a new clause that compliance to be demonstrated by design certificate. AND 4. Delete matters of discretion from NOISE-S3.3 and replace with a single matter of discretion being the effects of exceedances.</p>	Oppose	Consistent with the Kāinga Ora submission, Kāinga Ora consider that there is no evidence of reverse sensitivity affecting the state highway network.	Disallow
NOISE – Noise NOISE-O2 Reverse sensitivity	Synlait Milk Limited	163.5	Oppose	<p>Supports intent of NOISE-O2, but is concerned that the objective is not limited to existing industrial activities, but also the potential future development capacity of land within industrial zones. The word 'constrained' should also be further qualified with reference to the possible loss of development rights, which is a more significant outcome than a hampering or restraint on activities and development which is implied in 'constraint'.</p> <p>Relief sought: Amend NOISE-O2 Reverse Sensitivity to read as follows <i>The Airport, Raceway, State Highway, railway lines, and the Port and activities and development potential located within commercial, mixed use and industrial zones are not constrained or lost as a consequence of by-reverse sensitivity effects arising from noise sensitive activities.</i> OR wording to similar effect.</p>	Oppose	Kāinga Ora consider that effects in relation to industrial activities should be managed at source. This is particularly relevant to any expansion of an existing activity.	Disallow
SD - Strategic Direction SD-O1 Residential	Silver Fern Farms	172.13	Amend	<p>Considers that the fundamental land use planning issue of separation between incompatible uses should be expressed in this objective.</p> <p>Relief sought: Amend SD-O1 as follows: <i>SD-O1 Residential Areas and Activities</i> [...]</p>	Oppose	Kāinga Ora opposes this relief, noting that the presence of Industrial landuses in proximity to residential areas does not, in and of itself, present a reverse sensitivity effect warranting additional controls or management. Kāinga Ora also consider that effects in relation to industrial activities should be managed at source.	Disallow



Provision / Chapter Topic	Submitter Name	Submission Point Number	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
Areas and Activities				<i>iv. The location of new residential areas and activities avoids creating conflict with incompatible zones and activities.</i>			
Definitions Reverse Sensitivity	Alliance Group Limited	173.13	Amend	<p>Considers the definition is too narrowly focused on “existing lawfully established activity” and it should be expanded to address consented but unimplemented activities, and permitted activities as these are part of the permitted baseline and it would accord with the intent of the approach to include.</p> <p>Relief sought: Amend the definition of Reverse Sensitivity as follows: <i>Reverse sensitivity means the potential for the operation of an existing permitted, consented or lawfully established activity, and the future development or expansion of that activity to be compromised, constrained, or curtailed by the more recent possible or proposed establishment, intensification or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an existing that activity.</i></p>	Oppose	Kāinga Ora consider that effects in relation to industrial activities should be managed at source. This is particularly relevant to any expansion of an existing activity.	Disallow
SUB – Subdivision  (new) Objective	Connexa Limited	176.78	Amend	<p>Considers that reverse sensitivity should be a consideration for all subdivisions. Considers an objective providing direction on this matter is warranted and supports SUB-5 as notified.</p> <p>Relief sought: Amend SUB - Subdivision Chapter to add a new objective, as follows: <i>SUB-O[X] Reverse sensitivity. Reverse sensitivity effects of subdivision on existing lawfully established activities (including network utilities) are avoided where practicable or mitigated where avoidance is not practicable.</i></p>	Oppose	Kāinga Ora consider that effects in relation to industrial activities should be managed at source. This is particularly relevant to any expansion of an existing activity.	Disallow
Definitions “Earthworks”	Federated Farmers	182.10	Amend	<p>Delete definition of Earthworks as this definition is already well covered in the proposed amendments by the submitter to ‘Ancillary Rural Earthworks’.</p> <p>Relief: 1. Delete the definition of Earthworks. AND 2. Any consequential amendments required as a result of the relief sought.</p>	Oppose	The definition of earthworks must be consistent with the National Planning Standards.	Disallow
General	Canterbury Regional Council (Environment Canterbury)	183.1	Amend	Notes that a large number of rules in the plan use variable terminology to define floor areas of buildings, often with the term undefined, so that it is not clear what is being measured. It is necessary to review all references to size of buildings and consider whether a clear definition is required linking development to either the “building footprint” or “gross floor area”, which are defined National Planning Standard terms, and then create exclusions from those terms within the rules if necessary.	Support	Kāinga Ora supports consistent terminology that aligns with the National Planning Standards.	Allow

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				Relief sought: Review the entire plan so all references to the size of buildings, link to either building footprint or gross floor area which are defined terms in the National Planning Standards.			
General	Canterbury Regional Council (Environment Canterbury)	183.2	Amend	Notes throughout the whole plan, there are very few activities that propose to dispense with public or limited notification, whereas there are many activities where either public or limited notification is not warranted (for example, breach of outdoor living space provisions). It is recommended that all rules in the plan be considered as to whether limited or public notification can be dispensed with.  Relief sought: Review the entire plan and consider whether public or limited notification can be dispensed with where resource consent is required.	Support	Consistent with the Kāinga Ora submission, Kāinga Ora supports consistent notification provisions.	Allow
Definitions "Urban Development"	Canterbury Regional Council (Environment Canterbury)	183.9	Amend	Suggests drafting a new definition of urban development, as the current definition was developed to be specific to Kāinga Ora. The drafting should be in line with the definition of Urban in the CRPS and ensure that there is a clear delineation between urban, rural, and rural residential.  Relief sought: Delete definition of Urban Development and replace as follows: <i><u>Urban development means development within an area zoned as a Residential Zone, Settlement Zone, Commercial and Mixed Use Zone, General Industrial Zone, or an Open Space Zone that is adjacent to the aforementioned zones. It also includes development outside of these zones which is not of a rural or rural-lifestyle character and is differentiated from rural development by its scale, intensity, visual character and the dominance of built structures. For the avoidance of doubt, it does not include the provision of regionally significant infrastructure in Rural Zones.</u></i>	Oppose	Kāinga Ora does not consider the proposed definition is appropriate, is lengthy and ambiguous and considers that the following amendment to the proposed district plan definition to address the concerns of ECan:  <u>The Development of housing, commercial, industrial, and community activities, or other amenities, infrastructure, facilities, services, or works located within urban areas. This includes the development and renewal of urban environments.</u>	Disallow
UFD - Urban Form and Development  General	Canterbury Regional Council (Environment Canterbury)	183.19	Amend	Considers a number of the objectives and policies in the Future Development Area chapter are relevant at a strategic level, and should be incorporated in the Strategic Directions chapter, and/or the Urban Form and Development chapter. Those two chapters are extremely important when considering applications for private plan changes. In addition, more detail is required to ensure that the National Policy Statement on Urban Development is given effect and meaning in the local context.  Relief sought: Reconsider the objectives and policies and consider movement of relevant objectives and policies from the Future Development Areas chapter to the Strategic Directions chapter and/or Urban Form and Development Chapter, and ensure the provisions give effect to the	Support	Consistent with the Kāinga Ora submission. Kāinga Ora supports the alignment of objectives and policies that align with the NPS-UD.	Allow

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				NPS-UD and meaning is provided in the local context.			
UFD - Urban Form and Development (new) Policy	Canterbury Regional Council (Environment Canterbury)	183.21	Amend	<p>Opposes that there is no minimum yield for new urban areas in the plan. Minimum yields are an important part of ensuring that a range of housing choices are provided, that infrastructure is developed in an efficient manner, and that the rural land resource on the urban fringe is also developed so that it is maximised.</p> <p>Relief sought: Amend the Urban Form and Future Development Chapter to include a policy UFD-PX, to ensure that housing in Future Development Areas is developed with a minimum yield of 12 household per hectare over the area of an FDA, and provide for a range of densities within the FDA to ensure that housing choice is provided within new development areas.</p>	Support	Kāinga Ora supports the inclusion of minimum yields to support intensification at a level that supports housing choice.	Allow
NOISE – Noise NOISE-R9 Any new building for use by a noise sensitive activity and alterations to existing buildings for use by a noise sensitive activity (not listed in NOISE-R12)	Te Runanga o Ngai Tahu	185.53	Oppose	<p>Considers the potential noise risk could be much lower than indicated in the Background Report from Malcom Hunt and the rules could be excessive. There is limited land that is suitable for buildings and 'noise sensitive activities' within the Māori Purpose Zone. There are also increased infrastructure costs to running services to buildings further away from the road, as well as the costs of insulating or bringing an acoustic expert into the district for an assessment.</p> <p>Relief sought: Review the rule by engaging an acoustic expert to assess the generated noise, vehicle speeds and times it is generated on the state highway and railway networks and based on that assessment re-assess if the rules are protecting human health at their current setbacks. The Council should also re-assess if the State Highway at the Māori Purpose Zone has the correct speed limit as iwi have asked for the speed to be reduced.</p>	Support	Consistent with the Kāinga Ora submission, Kāinga Ora consider that there is no evidence of reverse sensitivity affecting the state highway network.	Allow
Definitions "Reverse sensitivity"	KiwiRail Holdings Limited	187.14	Amend	<p>Supports subject to amendment. Considers the definition should recognise that in the context of rail, activities are more than operation of the railway and should encompass development, upgrading and ongoing maintenance of the rail network including rail yards.</p> <p>Relief sought: <i>Amend the definition of Reverse Sensitivity as follows:</i></p>	Oppose	Kāinga Ora opposes the suggested changes to the definition. Kāinga Ora consider that the development and upgrading of an activity (such as rail, highways or industrial activities) must mitigate effects at source.	Disallow

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				<i>means the potential for the <u>development, upgrading, operation and maintenance of an approved, existing lawfully permitted established activity to be compromised, constrained, or curtailed by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived adverse environmental effects generated by an approved, existing or permitted activity.</u></i>			
SUB – Subdivision  SUB-P9 Residential subdivision	KiwiRail Holdings Limited	187.64	Amend	Seeks the strengthening of clause 7. to avoid conflict and adverse effects on adjoining land uses including the rail corridor.  Relief sought: Amend SUB-P9 Residential subdivision as follows: <i>Require residential subdivision to accord with the purpose, character and qualities of the zone, and maintain and enhance amenity values, by ensuring:</i> [...] <i>7. <u>adverse effects, including reverse sensitivity effects from conflict between residential activities and adjoining land uses are avoided minimised.</u></i>	Oppose	Kāinga Ora opposes this relief, noting that the presence of infrastructure in proximity to noise sensitive activities does not, in and of itself, warrant avoiding the presence of such activities.	Disallow
NOISE – Noise  NOISE-R9 Any new building for use by a noise sensitive activity and alterations to existing buildings for use by a noise sensitive activity (not listed in NOISE-R12)	KiwiRail Holdings Limited	187.77	Amend	Seeks the amendment and inclusion of noise and vibration controls requiring acoustic insulation and ventilation to be installed in new (or altered) sensitive uses within 100m of the railway corridor because noise and vibration can create adverse health and amenity effects, and an impact on the internal amenity of a building.  Relief sought: Amend NOISE-R9 as follows: <i>Any site within 40m of a State Highway with a posted speed limit of 50 km/hr or less</i> <i>Any site within 80m of a State Highway with a posted speed limit greater than 50 km/hr</i> <i>Any site within <u>100m</u> <del>40m</del> of the railway line</i> [...] <i>Activity status: Permitted</i> <i>Where:</i> <i>PER-1</i> <i>The building or alteration to an existing building is acoustically insulated and ventilated in accordance with:</i> <i>1. NOISE-S3 and NOISE-S4; and</i> <i>2. the acoustic insulation must be assessed in accordance with ISO 717-1:2020 Acoustics — Rating of sound insulation in buildings and of building elements — Part 1: Airborne sound insulation, <u>excluding acoustic insulation installed to address rail noise;</u> or</i> <i>PER-2</i> <i>An acoustic design certificate signed by a suitably qualified acoustic engineer demonstrates either:</i> <i>a. [...]</i> <i>b. the building is at least <u>50-20</u> metres from all roads subject to the standard and/or the railway line and there is a solid building, fence,</i>	Oppose	Kāinga Ora opposes the reliance on standard ‘metric setbacks’ ” to identify the areas of land adjacent to State Highways and railway lines that require acoustic treatment. This metric setback approach relies on the “worst-case” potential noise emissions at maximum distances from the corridors. The standard metric setback approach will impact on land that is not by affected by noise to the extent that mitigation is required.	Disallow

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				<p>wall or landform that completely blocks the line-of-sight from all parts of all windows and doors to all parts of any road surface subject to the standard, or all points above 3.8 metres for railway track.</p> <p><u>PER-3</u>  <u>Any new building or alteration to existing building containing an activity sensitive to noise, closer than 60 metres from the boundary of a railway network is designed, constructed and maintained in accordance with NOISE-S7.</u></p>			
NOISE – Noise NOISE-S3 Acoustic insulation	KiwiRail Holdings Limited	187.78	Amend	<p>Considers that for rail noise, the requirement to achieve a minimum internal noise level for habitable rooms allows for a more flexible, room-specific approach based on exposure to the noise source. Alternatively, the external to internal noise reduction (which takes a more blanket approach) could result in the over-designing of buildings and under-designing of more exposed buildings. Seeks amendment to provide a specific rule clause for habitable rooms in a new building or altered building within 100m of the rail corridor.</p> <p>Relief sought:  Amend NOISE-S3 Acoustic insulation as follows:</p> <ol style="list-style-type: none"> <li> <p><u>Within 40m of a State Highway with a posted speed limit of 50 km/hr or less</u>  <u>Within 80m of a State Highway with a posted speed limit greater than 50 km/hr</u>  <del><u>Within 40m of a railway line</u></del>  [...]</p> </li> <li> <p><u>Within 100m of a railway line</u>  1. Any habitable room in a new building used for a noise sensitive activity, or an alteration to an existing building that changes its use to a noise sensitive activity:  a. is designed, constructed and maintained to achieve indoor noise levels resulting from the railway not exceeding 35 dB LAeq(1h); or  b. is a single-storey framed residential building with habitable rooms designed, constructed and maintained in accordance with the construction schedule in Table 25 - Minimum construction requirements for external building elements of habitable rooms to achieve an advanced level of acoustic insulation.  2. A report is submitted to the council demonstrating compliance with the above prior to the construction or alteration of any building containing an activity sensitive to noise.  <u>Matters of discretion are restricted to:</u>  1. Whether the activity sensitive to noise could be located further from the railway network.  2. The extent to which the noise criteria are achieved and the effects of any non-compliance.  3. The character of, and degree of, amenity provided by the existing environment and proposed activity.</p> </li> </ol>	Oppose	Kāinga Ora oppose the reliance on standard ‘metric setbacks’ ” to identify the areas of land adjacent to State Highways and railway lines that require acoustic treatment. This metric setback approach relies on the “worst-case” potential noise emissions at maximum distances from the corridors. The standard metric setback approach will impact on land that is not by affected by noise to the extent that mitigation is required.	Disallow



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				<p>4. <i>The outcome of any consultation with KiwiRail.</i></p> <p><u>Notification:</u>  <i>Application for resource consent under this rule will be decided without public notification. KiwiRail are likely to be the only affected person determined in accordance with section 95B of the Resource Management Act 1991.</i></p>			
NOISE – Noise (new) Standard	KiwiRail Holdings Limited	187.80	Amend	<p>Seeks a new standard relating to indoor railway vibration. This standard is designed to protect the rail corridor from reverse sensitivity effects and provide an appropriate level of amenity for occupants that neighbour the rail corridor.</p> <p>Relief sought:            Add the following new Standard to the NOISE Chapter:  <u>NOISE-S7 Indoor railway vibration</u>            1. <i>Any new buildings or alterations to existing buildings containing an activity sensitive to noise, closer than 60 metres from the boundary of a railway network:</i>            a) <i>is designed, constructed and maintained to achieve rail vibration levels not exceeding 0.3 mm/s vw,95 or</i>            b) <i>is a single-storey framed residential building with:</i>  <u>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;</u>  <u>and</u>  <u>II. vibration isolation separating the sides of the floor slab from the ground; and</u>  <u>III. no rigid connections between the building and the ground.</u>            2. <i>A report is submitted to the council demonstrating compliance with the above prior to the construction or alteration of any building containing an activity sensitive to vibration.</i>  <u>Matters of discretion are restricted to:</u>            1. <i>Whether the activity sensitive to vibration could be located further from the railway network.</i>            2. <i>The extent to which the vibration criteria are achieved and the effects of any non-compliance.</i>            3. <i>The character of, and degree of, amenity provided by the existing environment and proposed activity.</i>            4. <i>The outcome of any consultation with KiwiRail.</i></p> <p><u>Notification:</u> <i>Application for resource consent under this rule will be decided without public notification. KiwiRail are likely to be the only affected person determined in accordance with section 95B of the Resource Management Act 1991</i></p>	Oppose	Kāinga Ora oppose the reliance on standard ‘metric setbacks’ ” to identify the areas of land adjacent to State Highways and railway lines that require vibration treatment. This metric setback approach relies on the “worst-case” potential vibration emissions at maximum distances from the corridors. The standard metric setback approach will impact on land that is not by affected by vibration to the extent that mitigation is required.	Disallow
General All Zones	KiwiRail Holdings Limited	187.85	Amend	<p>The submitter notes there is variation in boundary setback rules in zone chapters in the Proposed Plan. For health and safety reasons, the submitter seeks a setback for structures from the rail corridor boundary. A 5m setback from the rail corridor is appropriate in providing for vehicular access to the backs of buildings (e.g. a cherry picker) and allowing for scaffolding to be erected safely.</p>	Oppose	Kāinga Ora opposes the relief sought, as the proposed plan setbacks provide adequate space for maintenance activities within sites adjacent to the rail network. In doing so, it will continue to protect the safe, efficient, and effective operation of the rail infrastructure while balancing the cost on landowners.	Disallow

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				<p>Relief sought:  Add new rules to all relevant zone chapters (where the zone is adjacent to the rail corridor including GRZ, MRZ, GRUZ, SETZ, LFRZ, MUZ, TCZ, CCZ, GIZ, NOSZ, OSZ, SARZ, MPZ, PORTZ) as follows:  <u>XXX-RX Rail corridor setback</u>  <u>Activity Status Permitted</u>  <u>Where:</u>  <u>No building or structure may be located within 5m of any site boundary with the rail corridor.</u>  <u>Activity status when compliance not achieved: RDIS</u>  <u>XXXX-RX Buildings or structures not meeting Rule XXX-RX</u>  <u>Activity Status Restricted Discretionary</u>  <u>Where:</u>  <u>The building is setback less than 5m from the rail corridor boundary.</u>  <u>Discretion is restricted to:</u>  1. <u>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; and</u>  2. <u>the safe and efficient operation of the rail network.</u></p>			
General All Zones	The Retirement Villages of New Zealand Limited	230.11	Amend	<p>The Submitter supports in principle the inclusion of retirement village specific rules of a permitted/restricted discretionary activity status. The submitter considers the matters of discretion should be guided by the Enabling Housing Act. The submitter further considers a public notification for retirement village is an overly cautious approach and considers public notification should be precluded and limited notification should be restricted for retirement villages.</p> <p>Relief sought:  Amend the PDP to include the below new rules in all zones that provides for residential activity:  <u>R1 Retirement Villages, excluding the construction of buildings</u>  <u>Activity status: Permitted.</u>  <u>R2 Construction of buildings for a Retirement Village</u>  <u>Activity status: Restricted Discretionary Matters of discretion are limited to:</u>  1. <u>The effects arising from exceeding any of the following standards: S1 -S4 and excluding a non-compliance that does not trigger limited notification.</u>  2. <u>The effects arising from exceeding any of the following standards: S4 -S8.</u>  3. <u>The effects of the retirement village on the safety of adjacent streets or public open spaces.</u>  4. <u>The effects arising from the quality of the interface between the retirement village and adjacent streets or public open spaces.</u>  5. <u>When assessing the matters in (1), (2) and (3), consider:</u></p>	Oppose	Kāinga Ora opposes submission point 230.11 as it considers that the activity status should be RDA.	Disallow

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				<p><u>a. The need to provide for efficient use of larger sites.</u></p> <p><u>b. The functional and operational needs of the retirement village.</u></p> <p><u>6. 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:</u></p> <p><u>An application for resource consent made in respect of rule GRZ-R2 is precluded from being publicly notified.</u></p> <p><u>An application for resource consent made in respect of rule GRZ-R2 that complies with S1-S4 is precluded from being limited notified.</u></p>			
Definitions (new) "Household"	Ara Poutama Aotearoa, The Department of Corrections	239.4	Amend	<p>The submitter seeks that a new definition, to clarify that a household is not necessarily limited to a family unit or a flatting arrangement (which are more commonly perceived household situations).</p> <p>Relief sought: Insert new definition as follows: <u>Household:</u> <u>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 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> <u>AND</u> <u>Any consequential amendments required to give effect to this relief.</u></p>	Oppose	Kāinga Ora seeks clarity as to how this definition relates to other defined activities within the Proposed District Plan.	Disallow
General	Woolworths New Zealand Limited	242.1	Amend	<p>The submitter notes that the PDP as notified takes a 'centres' approach. Generally support the 'centres hierarchy' approach but considers the notified approach is not adaptive nor responsive to evolving supermarket retailing.</p> <p>The submitter supports a 'centres plus' approach to achieve the best outcomes for the City and its communities. To achieve so, the submitter considers below activity status for supermarkets are appropriate:</p> <p>a. Permitted in all Centre zones; b. Restricted Discretionary in the Mixed-Use zone for larger-scale supermarkets; c. Discretionary in the General Industrial zone and General Residential zone.</p> <p>The submitters considers the PDP would limit future re-zoning of land for commercial and mixed use purpose and result in an insufficient land supply. If this approach is not changed through the PDP process, the submitter considers the PDP should enable supermarket activities through a consenting pathway. This will include amending the plan to:</p> <p>1. Establish parameters for consenting assessment relative to what constitutes appropriate out-of-centre activity;</p>	Oppose	Kāinga Ora consider that supermarkets are adequately addressed as commercial activities within the PDP. A nuanced approach is required for the size of the supermarket to address associated effects appropriately.	Disallow



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				<p>2. How supermarkets can be appropriately consented in Zones other than Centre Zones;</p> <p>3. Amend the Strategic Directions to provide a positive framework for establishing new business zoned land;</p> <p>4. Establishing enabling and flexible provisions for commercial activities, especially supermarkets in urban zones.</p> <p>Relief sought:</p> <p>1. Amend the PDP to address the submitter's concerns to ensure the PDP be adaptive and responsive to evolving supermarket retail to achieve the best outcomes for the District and its communities. Such as providing a "centre plus" approach, or a consenting pathway if the 'centre plus' approach is not adopted.</p> <p>AND</p> <p>2. One way to address the submitter's relief sought is per detailed on specific provisions below.</p> <p>AND</p> <p>3. Any necessary consequential relief to give effect to the submission.</p>			
GRZ - General Residential Zone  GRZ-R14 Activities not otherwise listed in this chapter	Woolworths New Zealand Limited	242.18	Amend	<p>Considers the definition of large format retail means any individual retail tenancy with a GFA greater than 450 sq.m in the GRZ would default to non-complying under GRZ-R18. Submitter seeks that the status of supermarkets be discretionary hence request amendments to GRZ-R14 &amp; GRZ-R18 to capture this.</p> <p>Relief sought: Amend GRZ-R14 as follows: <i>GRZ-R14 Activities not otherwise listed in this chapter (including supermarkets)</i> <i>General Residential Zone</i> <i>Activity status: Discretionary</i> <i>Activity status where compliance not achieved: Not applicable</i></p>	Oppose	Kāinga Ora consider that large format retail of 450m <sup>2</sup> within the GRZ should remain non-complying activities as proposed by the PDP to appropriately afford the scale of effects of such an activity within the GRZ.	Disallow
GRZ – General Residential Zone  GRZ-R18 Large format retailing	Woolworths New Zealand Limited	242.19	Amend	<p>Considers the definition of large format retail means any individual retail tenancy with a GFA greater than 450 sq.m in the GRZ would default to non-complying under GRZ-R18. Submitter seeks that the status of supermarkets be discretionary hence request amendments to GRZ-R14 &amp; GRZ-R18 to capture this.</p> <p>Relief sought: Amend GRZ-R18 as follows: <i>GRZ- R18 Large Format Retailing (excluding supermarkets)</i> <i>General Residential Zone</i> <i>Activity status: Non-Complying</i> <i>Activity status where compliance not achieved: Not applicable</i></p>	Oppose	Kāinga Ora consider that large format retail of 450m <sup>2</sup> within the GRZ should remain non-complying activities as proposed by the PDP to appropriately afford the scale of effects of such an activity within the GRZ.	Disallow

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MRZ - Medium Density Residential Zone  MRZ-R15 Activities not otherwise listed in this chapter	Woolworths New Zealand Limited	242.21	Amend	<p>The proposed definition of large format retail means any individual retail tenancy with a GFA greater than 450 sq.m in the MRZ would default to non-complying under MRZ-R17. Submitter seeks that the status of supermarkets be discretionary and proposes amendments to MRZ-R15 and MRZ-R17 to capture this.</p> <p>Relief sought: Amend MRZ-R15 as follows: <i>MRZ-R15 Activities not otherwise listed in this chapter (Including supermarkets)</i> <i>General Residential Zone</i> <i>Activity status: Discretionary</i> <i>Activity status where compliance not achieved: Not applicable</i></p>	Oppose	Kāinga Ora consider that large format retail of 450m <sup>2</sup> within the MRZ should remain non-complying activities as proposed by the PDP to appropriately afford the scale of effects of such an activity within the MRZ.	Disallow
MRZ - Medium Density Residential Zone	Woolworths New Zealand Limited	242.22	Amend	<p>The proposed definition of large format retail means any individual retail tenancy with a GFA greater than 450 sq.m in the MRZ would default to non-complying under MRZ-R17. Submitter seeks that the status of supermarkets be discretionary and proposes amendments to MRZ-R15 and MRZ-R17 to capture this.</p> <p>Relief sought: Amend MRZ-R17 as follows: <i>MRZ-R17 Large format retail (excluding supermarkets)</i> <i>General Residential Zone</i> <i>Activity status: Non-Complying</i> <i>Activity status where compliance not achieved: Not applicable</i></p>	Oppose	Kāinga Ora consider that large format retail of 450m <sup>2</sup> within the MRZ should remain non-complying activities as proposed by the PDP to appropriately afford the scale of effects of such an activity within the MRZ.	Disallow