

12th May 2023

Attn: Mark Stevenson
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Submission lodged via email: engagement@ccc.govt.nz

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON A NOTIFIED
PROPOSAL FOR PLAN CHANGE 14 UNDER CLAUSE 6 OF SCHEDULE 1 OF THE
RESOURCE MANAGEMENT ACT 1991**

This is a submission on Plan Change 14 – Housing and Business Choice (“PC14”) from Christchurch City Council (“the Council” on the Operative Christchurch District Plan (“the Plan”).

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

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

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

PC14 in its entirety.

This document and the appendices attached is Kāinga Ora submission on PC14.

The Kāinga Ora submission is:

1. Kāinga Ora Homes and Communities (“Kāinga Ora”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
 - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
 - b) Support good access to jobs, amenities and services; and
 - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across the Canterbury Region, including Christchurch City.
3. Kāinga Ora therefore has an interest in both PC13 and PC14 and how they:
 - a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
 - b) Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental, and market housing; and
 - c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. Kāinga Ora supports the general direction and intent of Plan Change 14, especially to the extent that this suite of plan changes is more enabling of residential and business development capacity compared to the Christchurch City Council Operative District Plan.

In particular, Kāinga Ora supports:

- a) The recognition of the need for well-functioning urban environments (consistent with the direction set out in the National Policy Statement on Urban Development 2020 (“**NPS-UD**”));
- b) The provision of medium density housing in most existing residential areas across the city, which is consistent with the requirements of the Resource Management (Enabling Housing Supply) Amendment Act 2021 (“**the Amendment Act**”);
- c) The recognition of the need to provide sufficient development capacity to meet long term demands for housing and business land;
- d) The need to manage significant risks from natural hazards;
- e) The promotion of a compact urban form and residential intensification in Christchurch City;
- f) The provision for enabling medium to high density residential development within a walkable catchment of the City Centre and larger Commercial Centres; and
- g) The provision of a range of commercial and mixed-use environments which will provide for and support urban development across Christchurch City.

5. The Kāinga Ora submission seeks amendments to PC14 in the following topic areas:

Qualifying Matters

- a) Kāinga Ora could support the qualifying matters, subject to amendments and clarifications as sought in the submission with the exception of: Low Public Transport Accessibility, Key Transport Corridors, Sunlight Access, Residential Heritage Areas, Character Areas, the Christchurch International Airport Noise Influence Area, Industrial Interfaces, and Open Space Areas which are opposed in full by Kāinga Ora for the reasons included in **Appendix 1**.
- b) Kāinga Ora considers that qualifying matters need to be expressed more clearly across PC13 and PC14 to assist with plan administration and interpretation. For example, having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards. Whilst other Heritage Area provisions are being progressed through a separate PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.

- c) Kāinga Ora opposes the proposed introduction of certain new qualifying matters through the IPI process because doing so in this instance (having regard to the nature of the particular qualifying matters concerned) goes beyond the scope of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021. The concerns about the use of the IPI process for this purpose was highlighted in the recent Environment Court's decision of *Waikanae Land Company Limited v Heritage New Zealand Pouhere Tāonga [2023] NZEnvC 056*. As noted in that case, if a Council wishes to implement other changes to its district plan, then there is the usual First Schedule process that can be adopted, with that process containing the appropriate safeguard of a full appeal to the Environment Court.

Residential Heights

- d) Kāinga Ora supports the application of a Medium Density Residential Zone (MRZ) across all relevant residential zones. It also supports the introduction of High Density Residential Zone (HRZ) around the edge of the City Centre and where located in close proximity to larger commercial centres. The extent of HRZ is sought to be increased in the Riccarton area given the scale of the Riccarton commercial centre and proximity to the University of Canterbury activity hub. In addition to the increased spatial extent of HRZ being sought, Kāinga Ora submits that the heights and centre hierarchy be simplified, with greater enablement of taller buildings provided.
- e) Further to this, Kāinga Ora seeks that a Height Variation Control overlay of 36m be applied 1.20km from the edge of the City Centre Zone and the three Metropolitan Centre Zones as sought below.

Metropolitan Centre Zoning

- f) Kāinga Ora seeks the introduction of a new 'Metropolitan Centre Zone (MCZ) in the Plan to replace the Riccarton, Papanui, and Hornby Town Centre Zones to recognise the broader catchment these centres serve, both currently and to account for future growth of the residential catchment. The existing size, scale and function of these centres are such that they merit the application of a MCZ classification, with appropriate objectives, policies and rules framework. A MCZ chapter is sought and is attached in **Appendix 2**. Further, recent and proposed investment in public and active transport modes along the corridors in which these activity centres are located, support the case for a zoning classification reflective of their relative position within the centres hierarchy.

Industrial Interface, Industrial General, and Commercial Mixed Use proposals

- g) Kāinga Ora submits that the Industrial Interfaces qualifying matter and associated policies, and rules are deleted, and that the purported effects are managed, where necessary through noise controls and acoustic and ventilation requirements as opposed to the proposed density controls.
- h) In reviewing the locations that the Industrial Interface qualifying matter applies in the preparation of this submission, Kāinga Ora notes that the current function of many industrial general zone areas, that are located in primarily residential areas, would no longer meet a definition of 'industrial activity'. Kāinga Ora question if this zoning may no longer be appropriate for these locations and if an application of a commercial mixed use zone may be more appropriate; as has been proposed in PC14 for Sydenham.
- i) Similarly, in relation to the rules that have been proposed in commercial mixed use zone boundary changes in areas adjacent to the central city i.e. Sydenham and Phillipstown, Kāinga Ora express concern that the approach taken will not achieve the outcomes sought. Kāinga Ora proposes that the existing zoning remains and a schedule 1 process is followed, including structure planning and use of appropriate planning methods. This may also provide the Council with opportunities to support these changes through the Long Term Plan.

General Feedback

- j) Kāinga Ora submits that changes to policies, rules and matters of discretion are necessary to better reflect the requirements and intent of the 'the Housing Supply Act' and NPS-UD. Kāinga Ora considers that PC14 is not currently appropriately framed to recognise that as the character of planned urban areas evolves to deliver a more intensive and compact urban form, amenity values will change. Amendments are sought to ensure this is reflected more consistently throughout the provisions, in language that is consistent with the NPS-UD.
- k) The Kāinga Ora submission seeks changes to rules to address errors, to align with Schedule 3A of the Housing Supply Act, or to reduce duplication where the standards introduced via Schedule 3A overlap with District Plan provisions that are not proposed to be deleted.

- l) The Kāinga Ora submission seeks amendments to objectives, policies, rules and matters for discretion / assessment criteria - for improved clarity, effectiveness and focus on the specific resource management issue / effect to be addressed. Further, The scope and extent of assessment matters provide such broad discretion that they undermine the 'Housing Supply Act's' intent of a restricted discretionary activity status.
 - m) The submission seeks such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission above and in **Appendix 1**.
6. The changes requested are made to:
- a) Ensure that Kāinga Ora can carry out its statutory obligations;
 - b) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
 - c) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
 - d) Provide clarity for all plan users; and
 - e) Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.
7. The Kāinga Ora submission points and changes sought can be found within Table 1 of Appendix 1 which forms the bulk of the submission.
8. A Metropolitan Centre Zone chapter is sought and included in **Appendix 2**.
9. Mapping changes sought are included in **Appendix 3**.

Kāinga Ora seeks the following decision from Christchurch City Council:

That the specific amendments, additions or retentions which are sought as specifically outlined in this letter and **Appendix 1-3**, are accepted and adopted into PC14, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

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

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its

submission on PC14 to address the matters raised in its submission.

A handwritten signature in black ink, appearing to be 'BL', written over a horizontal dotted line.

Brendon Liggett

Development Planning Manager

Kāinga Ora – Homes and Communities

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Appendix 1: Decisions sought on PC14

The following table sets out the amendments sought to the PC14 and also identifies those provisions that Kāinga Ora supports.

*Proposed changes are shown as **strikethrough** for deletion and **underlined** for proposed additional text.*

Table 1

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
Zone Boundaries/ Mapping					
1.		Planning maps	Support in Part	<p>Kāinga Ora support the implementation of a Medium Density Residential Zone (MRZ) over all relevant residential zones. As set out in this submission, Kāinga Ora oppose the Public Transport Accessibility Qualifying Matter (QM) and the Airport Noise Influence Area QM and therefore seek as a consequence of deleting these QMs that the RS and RSDT zoned areas within these QMs be rezoned to MRZ.</p> <p>Kāinga Ora note some ambiguity in the provisions as to whether the land that is subject to the Tsunami Risk QM is intended to be zoned MRZ or RS/ RSDT. Whilst agreeing that a high risk of natural hazards is a legitimate QM, our</p>	<ol style="list-style-type: none"> 1. Retain MRZ over areas where MRZ is proposed in PC14 as notified unless otherwise changed by this submission. 2. Rezone to MRZ areas that are proposed as RS/ RSDT zones under the Public Transport Accessibility and Airport Noise Influence Area QMs. 3. Rezone Lyttelton to MRZ. 4. Rezone Papanui, Riccarton and Hornby Key Activity Centres to Metropolitan Centre Zone (MCZ) from Town Centre Zone and Large Format Retail Zone. 5. Rezone to HRZ areas that are proposed as MRZ within a Local Centre Intensification Precinct and remove the precinct. 6. Retain HRZ over areas where HRZ is proposed in PC14 as notified unless otherwise changed by this submission.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>submission raises concerns with whether the costs and benefits of this QM strike an appropriate balance, and question the appropriateness of using a threshold of a 1:500 year event plus a 1m rise in sea levels as the mapping base. Use of a lower density RS/ RSDT zoning should only be used where the risk of hazards is proven to be high and with a high return period.</p> <p>The areas subject to the 'Local Centre Intensification Precinct' are sought to be rezoned from MRZ to HRZ and the precinct overlay deleted. These areas are ideally located adjacent to medium-sized commercial centres that provide residential activities with easy access to a wide range of services and are also generally well serviced by public transport. As such, a HRZ is considered to be more appropriate and better aligned</p>	<p>7. Remove the Large Local Centre Intensification Precinct and replace with HDZ.</p> <p>8. Extend the boundary of HRZ in the Riccarton area as shown in the maps attached to this submission in Appendix 3.</p> <p>9. Delete the various height/intensification precincts and replace with a single 'Height Variation Control' precinct to reflect the 36m height limit sought in the submission for the HRZ adjacent to the City Centre, Hornby, Riccarton, and Papanui centres as shown in the maps attached to this submission within Appendix 3.</p> <p>Generally these are:</p> <ul style="list-style-type: none"> - 22m HDZ 1.20km from the edge of the new MCZ and the CCZ. - 36m Height Variation Overlay 400m from the edge of the new MCZ and CCZ.

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				<p>with NPS-UD and National Planning Standard outcomes.</p> <p>Kāinga Ora submits that Metropolitan Centres be employed within the centres hierarchy. Kāinga Ora seeks that this covers the existing key activity areas for Riccarton, Papanui, and Hornby.</p> <p>Kāinga Ora support the inclusion of a HRZ in appropriate locations close to the City Centre, Metropolitan and larger suburban commercial centres. The zone boundaries for the HRZ is supported, with the only exception being in the Riccarton area where an extension of the HRZ boundaries are sought to better recognise the proximity of this area to a wide range of commercial services, university activity node, high frequency public transport, cycle ways, and the relief sought in the submission opposing the</p>	

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				<p>Riccarton Bush, Industrial Interface, Airport Influence Density Precinct, and Piko/Shands heritage area and character area QMs. Noting also the recommendation that Kāinga Ora has suggested in relation to amendments to the Industrial General Zoning at 247 Riccarton Road and 37 Euston Street.</p> <p>Kāinga Ora seeks to rationalise and simplify the height limits applicable to the HRZ, depending on the size of the adjacent commercial centre. Consequential amendments are therefore required to the various height/ intensification precincts to reflect the outcomes sought in the submission.</p>	
Chapter 3 - Strategic Directions					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
2.	3.3	Objective 3.3.3 – Ngāi Tahu mana whenua	Support in Part	<p>The proposed amendment to clause (a)(ii) is supported.</p> <p>This objective is sought to also include explicit reference to enabling the ability of mana whenua to establish Papakāinga/Kāinga Nohoanga as an important tool in meeting their well-being and prosperity as sought in the amendment.</p>	<p>1. Amend clause (a)(ii) as follows:</p> <p>Ngāi Tahu mana whenua's aspirations to actively participate priorities for their well-being and prosperity are recognised and provided for in the revitalisation of Ōtautahi, including the provision of Papakāinga/Kāinga Nohoanga are recognised; and</p>
3.	3.3	Objective 3.3.4 – Housing bottom lines and choice	Support	Support the proposed reference to Papakāinga/Kāinga Nohoanga as a new clause (b)(ii).	Retain clause (b)(ii) as notified.
4.	3.3	Objective 3.3.7 – Well functioning urban environment	Support in Part	<p>Clause (a) implements legislative requirements and is supported. The balance of the objective is likewise supported, with the exception of clause (a)(i)(A) which confuses urban form with landscape outcomes and adds little meaningful value to the objective.</p> <p>Clause (a)(E)(iii) relating to mana whenua must include</p>	<p>2. Retain the objective as notified, except for:</p> <p>Delete clause (a)(i)(A) Contrasting building clusters within the cityscape and the wider perspective of the Te Poho-o-Tamatea/the Port Hills and Canterbury plains; and</p>

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				<p>explicit reference to Papakāinga/Kāinga Nohoanga.</p> <p>It is noted that the clause numbering/ formatting is unclear.</p>	<p>Amend clause (a)(E)(iii) as follows:</p> <ol style="list-style-type: none"> 1. The cultural traditions and norms of Ngāi Tahu mana whenua, <u>including the provision of Papakāinga/Kāinga Nohoanga</u> 2. Update clause numbering.
5.	3.3	Objective 3.3.8 – Urban growth, form and design	Support in Part	<p>In line with our submission raising concerns that the proposed character area QM does not meet s32 requirements, in the event that the character area provisions are deleted, then existing clause (a)(ii) is also sought to be deleted.</p> <p>Similarly in line with our submission raising consistency of heights in local centres, and in line with concerns of the public transport access qualifying matter clause (a)(iv.)(A) is sought to be amended. The other amendments sought in PC14 to this objective are supported.</p>	<ol style="list-style-type: none"> 1. Retain objective as notified, except for the deletion of existing clause (a)(ii): <u>Has its areas of special character and amenity value identified and their specifically recognised values appropriately managed; and</u> 2. Amend clause (a)(iv.)(A) as follows: <u>in and around the Central City, Key Activity Centres (as identified in the Canterbury Regional Policy Statement), Town Centre, and larger Local neighbourhood</u>

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					<u>centres, and nodes of core public transport routes; and</u>
6.	3.3	Objective 3.3.10 – Natural and cultural environment	Oppose	In line with our submission seeking the deletion of the tree canopy financial contribution rules, the related proposed reference to tree canopy in the strategic objectives is also opposed.	Delete proposed clause (a)(ii)(E): Tree canopy cover in areas of residential activity that maintains and enhances the city's biodiversity and amenity, sequesters carbon, reduces stormwater runoff, and mitigates heat island effects; and
7.	3.3	Objective 3.3.13 - Infrastructure	Oppose	In line with our submission seeking the deletion of the Airport Influence Density Precinct and our concern that the Qualifying Matter does not meet s32 requirements, amend Clause (b).(iii.)	Delete clause (b).(iii.).
Chapter 6 – Qualifying Matters					
8.	Sites of Ecological Significance	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards	Support	Kāinga Ora support the Sites of Ecological Significance, the Outstanding and Significant Natural Features, and the Sites of Cultural Significance qualifying matters, noting these	<ol style="list-style-type: none"> 1. Retain the Sites of Ecological Significance qualifying matter. 2. Retain the Outstanding and Significant Natural Features qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	<ul style="list-style-type: none"> Outstanding Natural Features and Landscapes Sites of Cultural Significance (Wāhi Tapu / Wāhi Taonga, Ngā Tūranga Tūpuna, Ngā Wai and Belfast Silent File) 	<p>and/or intensification enabled under Policy 3.</p> <p>9.1.4.1.1 P1 Indigenous vegetation clearance.</p> <p>9.1.4.1.3 RD3 – RD6 Indigenous vegetation clearance.</p> <p>9.1.4.1.5 NC1 and NC3 Indigenous vegetation clearance.</p> <p>8.5.1.3 RD11 Subdivision of land.</p> <p>8.9.2.3 RD5 Earthworks.</p> <p>9.2.4.1 Table 1(a) – (d), (i), (o) – (s) Outstanding natural features and landscapes.</p> <p>9.5.4.1.3 RD3 – RD6 Wāhi Tapu / Wāhi Taonga.</p>		<p>are all relevant matters of national significance in Section 6.</p> <p>It is also noted that there is very little overlap between Sites of Ecological Significance and Outstanding Natural Features and Landscapes with existing residential zones.</p>	<p>3. Retain the Sites of Cultural Significance qualifying matter.</p>

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		8.5.1.3 RD11 Subdivision of land. 8.9.2.3 RD5 Earthworks.			
9.	Slope Hazard Areas	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3. 5.6.1 Slope Instability Management Area	Support	Kāinga Ora support the management of significant risks from natural hazards as a qualifying matter (in appropriate circumstances), noting that it is a matter of national significance in Section 6. As slope hazards are less dynamic and have greater certainty as to their risk over time than flooding (submitted on below) and are not subject to constant change through hazard mitigation works, Kāinga Ora supports the Slope Hazard Areas qualifying matter.	Retain the Slope Hazard Areas qualifying matter.
10.	High Flood Hazard Management Area	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards	Support in Part	Kāinga Ora supports a risk-based approach to the management of natural hazards, however, opposes the inclusion of further hazard	1. Amend the provisions to remove / delete the mapped Hazard Management Areas from within the District Plan and instead hold this information in non-statutory GIS maps.

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	<p>Coastal Hazard Management Areas</p> <p>Tsunami Management Area</p>	<p>and/or intensification enabled under Policy 3.</p> <p>5.4.5 Flood Ponding Management Areas</p> <p>5.4.6 High Flood Hazard Management Areas</p> <p>5.2.2.5.1 Managing development in Qualifying Matter Coastal Hazard Management Areas 5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area.</p> <p>5.2.2.5.2 Managing development within the Qualifying Matter Tsunami Management Area</p> <p>5.4A.1 – 5.4A.6 Rules – Qualifying Matter Coastal Hazard Management Areas</p>		<p>areas within the maps as part of the District Plan.</p> <p>Including Flood Hazard Areas in the District Plan ignores the dynamic nature of such hazards. Kāinga Ora accepts that it is appropriate to include rules in relation to these hazards but seeks that the rules are not linked to static maps.</p> <p>Other councils across the country adopt a set of non-statutory hazard overlay maps which operate as interactive maps on the respective Council's 'Geo Maps' website – a separate mapping viewer to the statutory maps. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 process under the RMA. Kāinga Ora notes that there is no formal requirement for hazard</p>	<ol style="list-style-type: none"> 2. Reduce the Tsunami Management Area to a 1:100 year hazard. 3. Amend and make consequential changes to give effect to this submission.

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		and Qualifying Matter Tsunami Management Area		<p>maps to be included within a district plan.</p> <p>Kāinga Ora also has concerns that the proposed policy approach relating to the Tsunami Management Area is too conservative, noting that Policy 24 of the NZCPS requires identification of areas in the coastal environment that are potentially affected by coastal hazards (including tsunami) over at least 100 years.</p> <p>Kāinga Ora also considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period.</p>	
11.	Historic Heritage, Residential Heritage Areas, and Residential	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium	Support Historic Heritage.	Kāinga Ora generally supports the protection of areas of historic heritage where the requirements of Section 6 of the Resource Management Act	Delete the Residential Heritage Area qualifying matter and all proposed provisions.

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	Heritage Area Interface.	Density Residential Standards and/or intensification enabled under Policy 3. 14.5.3.2.3 Building height - Residential Heritage Areas. 14.5.3.2.7 Number of Residential Units Per Site - Residential Heritage Areas. 14.5.3.2.8b, 8c Setbacks - Residential Heritage Areas. 14.5.3.2.9 Building Coverage - Residential Heritage Areas. 14.5.3.2.10c Outdoor living space - Residential Heritage Areas.	Oppose Residential Heritage Areas.	<p>1991 ('RMA' or 'the Act') are met. However, Kāinga Ora opposes the new proposed Heritage Areas ('HAs') that are sought to be introduced under PC13 and PC14 in their entirety.</p> <p>Kāinga Ora does not consider that the proposed HAs meet the requirements of Section 6 of RMA to the extent that they should be accorded 'historic heritage' status of 'national' significance.</p> <p>Therefore, if these areas are considered to manage character (s7 RMA), rather than protect heritage, Kāinga Ora considers that a more nuanced assessment of costs and benefits applies to areas with a high proportion of Kāinga Ora housing, such as the proposed Piko/Shands character and heritage areas (i.e. the benefits of providing a greater number of houses for the most vulnerable members of society,</p>	

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				<p>particularly in an area that has historically been used for social housing, are greater than retaining the character associated with existing housing per se, and therefore the character or heritage values of such locations must be carefully weighed to test the heritage values are existent and sufficiently so that they outweigh the social costs of lost development opportunity. We do not believe this test has been met.</p> <p>A more nuanced assessment of costs and benefits is likewise required for heritage areas in locations that are otherwise ideally located for further intensification, such as the heritage areas within and adjacent to the central city/ Four Avenues. Piko/ Shands is located in close proximity to both Riccarton and Church Corner commercial centres as well as an emerging high frequency public transport</p>	

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				<p>corridor along Riccarton Road and a new major cycle way network. Were it not for the heritage and character area overlays, the Piko/ Shands area would merit a High Density zoning/ height limits.</p> <p>The imposition (costs) of character controls in locations that would otherwise suit high density housing must therefore be greater than the costs applying to character areas more generally. It follows that the benefits of such regulation and the identification of these areas as Qualifying Matters must therefore be greater than the benefits generally in order to justify additional regulation.</p> <p>It is further noted that having some of the Heritage Area provisions being contained in PC14 and following an IPI process i.e. the built form standards, and other Heritage Area provisions being progressed through a separate</p>	

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				<p>PC13, and following a first schedule process i.e. Heritage Area policies has created efficiency issues.</p> <p>Consistency is sought with the Kāinga Ora submission on Plan Change 13 (“PC13”), which Kāinga Ora opposed the approach of establishing ‘Historic Heritage Areas’ in its entirety.</p> <p>Kāinga Ora is seeking the spatial application of residential zones to be applied across the City, regardless of the nature and extent of the current and proposed ‘Heritage Areas’ set out by Council in PC13. Kāinga Ora seeks the deletion of any proposed changes in PC14 that seek amendments to historic heritage and special character, consistent with the relief sought in PC13.</p> <p>Kāinga Ora considers that the proposed changes across PC13 and PC14 are not</p>	

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				qualifying matters, as the assessments in its view, do not meet the requirements under s6, s77I, s77J, s77K, and/or s77L of the RMA.	
12.	Significant and Other Trees (excluding those not identified as Qualifying Matters).	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>9.4.4.1.1 P1 – P12 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.2 C1 Tree maintenance.</p> <p>9.4.4.1.3 RD1 – RD8 Tree pruning, felling, earthworks.</p> <p>9.4.4.1.4 D1 – D2 Tree pruning, felling 9.4.7.1 Appendix – Schedules of significant trees.</p>	Support in Part	<p>Kāinga Ora support the Significant and Other Trees qualifying matter.</p> <p>The rules in Chapter 9 of the District Plan sufficiently recognise and provide for the management of notable trees. Such rules provide a suitable framework for considering new buildings in proximity to notable trees, or their removal.</p> <p>Rule 9.4.4.1.1 P12 triggers the need for resource consent for earthworks within 5m of a street tree, however consent is always granted provided the works are undertaken by, or under the supervision of, a works arborist. The relief sought would reduce costs and the reliance on the resource consent process and is therefore more consistent</p>	<ol style="list-style-type: none"> 1. Retain Significant and Other Tree Qualifying Matter. 2. Amend Rule 9.4.4.1.1 P12 as follows: <p>Rule 9.4.4.1.1 P12 - Activities shall be undertaken by, or under the supervision of, a works arborist. employed or contracted by the Council or a network utility operator.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				with Objective 3.3.2.	
13.	Waterbody setbacks	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.6.4 City and Settlement Water Body Setbacks 6.6.4.1 – 6.6.4.4 Activities within water body setbacks</p>	Support in Part	<p>Section 6 seeks the preservation of rivers and their margins and their protection from inappropriate subdivision, use and development. Similarly, Section 6 also recognises and provides for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga.</p> <p>Kāinga Ora is supportive of these Section 6 matters being identified as a qualifying matter. However, where the identified waterbodies do not meet a Section 6 threshold, such as for 'Environmental Asset Waterways' and 'Network Waterways' use of waterway setbacks as a qualifying matter, Council needs to demonstrate why development that is otherwise permitted under</p>	Remove 'Environmental Asset Waterways' and 'Network Waterways' as qualifying matter, unless a site by site assessment has been undertaken that demonstrates why development that is otherwise permitted under MDRS is inappropriate.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>MDRS is inappropriate, for every specific waterway (and adjacent site) where a qualifying matter is proposed.</p> <p>The existing provisions in Chapter 6.6 of the District Plan are sufficient.</p>	
14.	<p>Public Open Space areas; and</p> <p>Ōtākaro Avon River Corridor.</p>	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>18.4 to 18.96.1A Qualifying matters</p> <p>13.14 Specific Purpose (Ōtākaro Avon River Corridor) Zone – All provisions, including Appendix 13.14.6.2 specifying alternative zone provisions applicable to privately owned properties within the zone</p>	Oppose	<p>Kāinga Ora considers this qualifying matter is unnecessary and seek that it is deleted.</p> <p>While the use of areas for open space purposes is identified as a qualifying matter under RMA s77O(f), the areas zoned Open Space are owned by CCC and many are administered under the Reserves Act 1977. Council ownership, and Open Space zoning, makes it unlikely that these areas will be developed for medium density housing and such development would also be contrary to the purposes for which these sites were reserved. Further, the Housing Supply Act only requires CCC</p>	Delete the Open Space (recreation zone) qualifying matter and any relevant provisions proposed in its entirety.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>15.4.3.2.1 Maximum building height;</p> <p>Appendix 15.15.1 Town Centre Zone (Belfast/Northwood) Outline Development Plan</p>		<p>to incorporate MDRS into every relevant residential zone (not Open Space Zone).</p> <p>The s77O(f) matter is noted as being relevant for other councils where their District Plan does not include an Open Space zone and instead reserves often have a residential zoning.</p> <p>As with the Open Space Zones, Kāinga Ora note that the Ōtākaro 'red zone' area has been subject to detailed place-based assessment, with large-scale residential development not anticipated in this area.</p>	
15.	Residential Character Areas	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.3.1.1 P4 Conversion to two residential units –</p>	Oppose in Part	<p>Kāinga Ora support, in principle, the management of character as a qualifying matter. However, Kāinga Ora does not consider appropriate justification has been provided for the proposed new or extended 'character areas' set out in PC13 and PC14 to demonstrate that they contain specific characteristics that</p>	<ol style="list-style-type: none"> 1. Delete all new or extended character areas as qualifying matters and undertake further analysis to determine the exact values of the resources that the Council seeks to manage in the District Plan. 2. For existing character areas retain the controlled activity status for new buildings that exists in the Operative Plan - Rule 14.5.3.1.2 C1.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>Character Area Overlays</p> <p>14.5.3.1.2 C1 Character Area Overlays – new residential units to rear</p> <p>14.5.3.1.3, RD6, RD14 Area-specific rules and character overlays.</p> <p>14.5.3.2.3 Building height – Character Area Overlays.</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p> <p>14.15.27 Matters of discretion - Character Area Overlays.</p> <p>14.8.1.1 P18 – Conversion to two residential units –Lyttelton Character Area.</p> <p>14.8.3.1.1 P5 – Minor residential unit in Lyttelton Character Area or Lyttelton Residential Heritage Area.</p>		<p>make the level of development provided by the MDRS or policy 3 inappropriate in the area. Further, they blur the line between the protection of historic heritage values as set out under s6(f) of the RMA, and amenity values as set out under section 7 of the RMA. This is especially the case where both character and heritage area overlays apply to the same geographic area.</p> <p>Kāinga Ora questions the planning method and assessment undertaken to determine the proposed provisions.</p> <p>Kāinga Ora considers that any such provisions and values identified should be ‘managed’ rather than ‘protected’ in the District Plan. Kāinga Ora seeks the provisions as proposed are deleted and that further analysis is undertaken to determine the exact values of the resources that the Council</p>	<p>14.5.3.2.3 Building height – Character Area Overlays, and</p> <p>14.5.3.2.5 – 14.5.3.2.14 Built form rules – Character Area Overlays.</p> <p>3. In the event that the Character Area qualifying matter remains, explicit provision is sought for the ability to develop Papakāinga/Kāinga Nohoanga, noting that local Rūnanga have purchased the former Lyttelton West School Site.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>14.8.3.1.2 C3 – New residential unit to rear Lyttelton Character Area.</p> <p>14.8.3.1.3 RD3 – Lyttelton Character Overlay – new buildings, alterations etc.</p> <p>14.8.3.1.3. RD5-RD7, RD9 – not meeting Lyttelton Character Area or Residential Heritage Area built form rules 14.8.3.1.3 RD8, RD10 –not meeting Lyttelton Character Area built form rules.</p> <p>14.8.3.1.3 RD11 - Lyttelton Character Area or Lyttelton Residential Heritage Area – not meeting minor residential units rules.</p> <p>14.8.3.2.2 –14.8.3.2.6 Built form rules – Lyttelton Character Area or Lyttelton Residential Heritage Area.</p> <p>14.8.3.2.7 – 14.8.3.2.12 -Built form rules – Lyttelton Character Area only.</p>		<p>seeks to manage in the District Plan.</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
16.	Electricity Transmission Corridors.	6.1A Qualifying matters. Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3. 14.4.1.5 NC6 – NC7 National Grid transmission and distribution lines. 14.5.1.5 NC2 – NC3 National Grid transmission and distribution lines. 14.7.1.5 NC2 National Grid transmission and distribution lines. 14.12.1.5 NC1 – NC2 National Grid transmission and distribution lines.	Support	Kāinga Ora support this qualifying matter noting that the qualifying matter only relates to the National Grid Transmission Lines (nationally significant infrastructure) in accordance with s771(e) and no other lesser category of line.	Retain Electricity Transmission Corridors qualifying matter only to the extent of the corridor as defined in the NES ET.
17.	Airport Noise Influence Area	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the	Oppose in Part	Kāinga Ora seeks that the Airport Noise Influence Area qualifying matter be deleted thus allowing all existing	Delete this qualifying matter and all proposed provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>Safe or efficient operation of nationally significant infrastructure (Christchurch Airport)</p> <p>14.4.1 – 14.4.4, 14.13, 14.14 Low Density Residential Airport Influence Zone and Airport Influence Density Precinct.</p>		<p>residential zoned land within the Airport Noise Influence Area to be zoned Medium Density Residential as per the direction in the Act.</p> <p>While Kāinga Ora agrees that it is appropriate to protect strategic infrastructure (including Christchurch International Airport) from reverse sensitivity effects, it does not consider that restricting density under the Airport Noise Influence Area is necessary to avoid reverse sensitivity effects. Further, Kāinga Ora considers that the health, safety and amenity of existing and future residents living within the Airport Noise Influence Area would be appropriately maintained if the land was zoned Medium Density Residential. Any new buildings and additions to existing buildings located within the 55 dB Ldn air noise contour or the 55 dB Ldn engine testing contour would continue to be</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				subject to the acoustic insulation standards set out at Rule 6.1.7.2.2 (Activities near Christchurch Airport) in the District Plan as required by Policy 6.1.2.1.5 b. ii. (Airport noise).	
18.	Lyttelton Port Influence Overlay	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.8.3.1.1 – 14.8.3.1.5 Area-specific rules - Lyttelton Port Influences Overlay</p>	Support	<p>Kāinga Ora support the Lyttelton Port Influence Overlay qualifying matter noting that the qualifying matter only relates to nationally significant infrastructure in accordance with s771(e).</p> <p>Kāinga Ora does not oppose the noise insulation standards.</p> <p>Kāinga Ora notes that the geographic area covered by the Port Influence Overlay is small and overlaps with a proposed Heritage Area. Furthermore, the Port is obliged to pay for the acoustic insulation of existing dwellings within the contour (Rule 13.8.4.2.7), so the scale, plus the costs and benefits, are markedly different between the</p>	Retain Lyttelton Port qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Port Influence Overlay and the Airport Noise Influence Area qualifying matter.	
19.	NZ Rail Network Interface Sites.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>6.1.7 Activities near infrastructure.</p> <p>14.4.1.3 RD28 and 14.4.2.7 Setback from rail corridor.</p> <p>14.5.1.3 RD12 and 14.5.2.7 Setback from rail corridor.</p> <p>14.8.1.3 RD16 and 14.8.2.4 Setback from rail corridor.</p>	Oppose	Kāinga Ora considers that the standard internal boundary setback for zones is appropriate.	Delete NZ Rail Network Interface Sites qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		14.12.1.3 RD13 and 14.12.2.5 Setback from rail corridor.			
20.	Radio Communication Pathways for the Justice and Emergency Services Precinct.	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3. 6.12 Radio communication Pathway Protection Corridors.	Neutral	Kāinga Ora recognise the need to maintain radio communication for emergency services, and does not provide any further feedback.	Note: Table 1 in Chapter 6.1A references an abbreviation rather than the qualifying matter rule reference.
21.	Vacuum Sewer Wastewater Constraint Areas	6.1A Qualifying matters Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3. 8.9A Waste water constraint areas	Support in Part	Kāinga Ora recognise the need to ensure sufficient infrastructure is available to service developments. The Restricted Discretionary Activity status and the relevant matters of discretion are generally considered appropriate, however an additional matter of discretion that provides a consenting pathway for intensification in	Amend as follows: The Council's discretion shall be limited to the following matters: <u>c. The ability to connect into any nearby non-vacuum wastewater system.</u> <u>d. The extent to which alternative waste water solutions are available that do not adversely affect the</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				these areas where infrastructure constraints can be addressed by alternative means is required.	<u>function of the Council's waste water systems.</u>
22.	Sunlight Access	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.6 – Height in relation to boundary,</p> <p>14.6.2.2 – Height in relation to Boundary, 14.15.2 – Diagram D.</p>	Oppose	Kāinga Ora oppose 'Sunlight Access' being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.	Delete the Sunlight Access qualifying matter and all associated provisions.
23.	Low Public Transport Accessibility.	<p>14.1 Introduction,</p> <p>14.2 Objectives and Policies, 14.3 How to interpret and apply the rules, 14.4 Rules - Residential Suburban Zone and Residential Suburban Density Transition Zone, 14.7</p>	Oppose	Kāinga Ora opposes the 'Low Public Transport Accessibility' being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.	<ol style="list-style-type: none"> 1. Delete the Low Public Transport Accessibility Qualifying Matter and all associated provisions. 2. Rezone all areas subject to this QM to MRZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>Rules - Residential Hills Zone, 14.8 Rules - Residential Banks Peninsula Zone, 14.15 Rules - Matters of control and discretion, 14.16 Rules - Appendices – all as they apply to areas that are zoned Residential Suburban or Residential Hills, or in Lyttelton zoned Residential Banks Peninsula.</p>		<p>Kāinga Ora is particularly concerned to note the large areas with inadequate services in the eastern parts of the District, where the lack of such services has the potential to exacerbate existing social inequalities.</p>	
24.	Industrial Interface	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>8.6.15 North Halswell – additional standards 8.7.13 North Halswell – additional matters – Medium and High Density Residential Zones in North Halswell 8.8.17 North Halswell – additional matters of discretion.</p>	Oppose	<p>Kāinga Ora considers that effects from industrial activities should first be mitigated at the source.</p> <p>The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p>	Delete the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of the QM not outweighing the costs.</p>	
25.	Riccarton Bush Interface	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.3 Medium Density Residential Zone – Building height.</p> <p>14.4.2.3 Residential Suburban Zone – Building height.</p>	Oppose	<p>Kāinga Ora considers that the existing long-established Operative Plan rules requiring a 10m building and earthworks setback from boundaries with the Bush are appropriate for managing potential interface issues/ impacts on tree health. The retention of the existing setback is quite different from the proposed QM which extends across roads and goes some distance from the Bush itself.</p> <p>The area around Riccarton Bush is ideally located for supporting a High Density</p>	<ol style="list-style-type: none"> 1. Delete the Riccarton Bush Interface Qualifying Matter and all associated provisions. 2. The existing tree setbacks in Chapter 9.4 are retained.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Residential Zone given its close proximity to a Metropolitan centre, cycleways, high frequency bus routes, and the large university activity hub.	
26.	Key Transport Corridors – City Spine	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p> <p>14.5.2.18 – Spine Road setbacks.</p> <p>14.6.2.17 - Spine road setbacks.</p> <p>15.4.2.10 – spine corridor setbacks.</p> <p>15.5.2.10 Setback from corridor.</p>	Oppose	<p>Kāinga Ora oppose the ‘City Spine’ being a qualifying matter and considers this to be inconsistent with the requirements of Section 77L.</p> <p>The associated rules require buildings and outdoor living spaces to be set back from spine road corridors in both residential and commercial zones. In commercial zones there is a direct conflict in urban design outcomes (and rules) where the Key Pedestrian Frontage rules require buildings to be built up to the road boundary in order to deliver good urban design outcomes and facilitates a continuous street edge (often with veranda cover for pedestrians).</p>	Delete the Key Transport Corridors – City Spine Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p>15.6.2.11 Setback from corridor.</p> <p>15.8.2.13 Setback from corridor.</p> <p>15.10.2.10 Setback from corridor.</p> <p>15.12.2.13 Setback from corridor.</p> <p>15.14.5.3 Matters of Discretion.</p>		<p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
27.	Sites of historic heritage items and their settings (City Centre Zone) - Cathedral Square, New Regent Street, the Arts Centre.	<p>6.1A Qualifying matters</p> <p>Table 1 - Qualifying Matters - Provisions that may reduce the level of enablement of Medium Density Residential Standards and/or intensification enabled under Policy 3.</p>	Support	Kāinga Ora support the management of Historic Heritage as a qualifying matter, noting that Cathedral Square, New Regent Street and the Arts Centre contain individually listed heritage items and are within identified heritage settings. This is a matter of	Retain sites of historic heritage items and their settings (City Centre Zone) - Cathedral Square, New Regent Street, the Arts Centre.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		15.11.1.2 C2 Works at 100 Cathedral Square 15.11.1.3 RD9 Works at 100 Cathedral Square 15.11.1.3 RD11 buildings on New Regent Street, the Arts Centre, and in the Central City Heritage Qualifying Matter and Precinct 15.11.2.11 Building height in area-specific precincts		national significance in Section 6.	
28.	Belfast/Northwood Outline Development Plan Features	15.4.3.2.1 Maximum building height; Appendix 15.15.1 Town Centre Zone (Belfast/Northwood) Outline Development Plan.	Neutral	Kāinga Ora does not have a view on this site-specific qualifying matter.	
Chapter 5 – Natural Hazards					
29.	5.5	Policy 5.2.2.5.1 – Managing development in Qualifying Matter Coastal Hazard Management Areas	Support in Part	Kāinga Ora support the management of significant risks from natural hazards as a qualifying matter (in appropriate circumstances), noting that it is a matter of national significance in Section 6.	Amend the policy as follows: Within the following Qualifying Matters, development, subdivision and land use that would provide for intensification of any site shall be avoided, unless the risk is from coastal inundation and a site specific assessment demonstrates the

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Kāinga Ora generally supports the risk based approach to the management of natural hazards but considers that the avoidance of intensification should be reserved to high risk from coastal inundation.</p> <p>Rule 5.4A.4 D1 requires resource consent for new buildings, other than accessory buildings, extensions etc, in areas shown on the planning maps as Qualifying Matter Coastal Hazard Medium Risk Management Area as a Discretionary Activity. Even with a site specific assessment however, Policy 5.2.2.5.1 seeks to avoid this.</p>	<p>risk is medium, low or very low based on thresholds defined in Table 5.2.2.5.1a below:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
30.	5.5	Policy 5.2.2.5.2 - Managing development within Qualifying Matter Tsunami Management Area	Support in Part	<p>Kāinga Ora considers that the Council's intent to retain Residential Suburban / Residential Suburban Density Transition zoning in the Tsunami Management Area is disproportionate based on the modelled return period. This may be appropriate for 1:100 or 1:200, especially if such areas are also covered by high flood and/or coastal inundation risk overlays.</p> <p>Kāinga Ora seeks changes to the wording of Policy 5.2.2.5.2 to provide certainty of the outcomes intended, noting that the rule allows for up to four residential units to be constructed on these sites (Rule 14.4.1.1 P4, P5 and P6) so there is a disconnect between the use of the term 'avoid' and what the provisions would allow for as a permitted activity.</p>	<ol style="list-style-type: none"> Amend Policy 5.2.2.5.2 as follows: Within the Tsunami Management Area Qualifying Matter, avoid discourage development, subdivision and land use that would provide for intensification of any site, unless the risk to life and property is acceptable. Alternatively the Policy framework could be retained if the geographic extent of the QM matter is better aligned with a 1:100 return period or covers an area reflective of the Tsunami Inundation area identified by the Greater Christchurch Partnership as part of its consultation on the Greater Christchurch Spatial Plan.
31.	5.4	Flood hazard provisions	Support in Part	Kāinga Ora seek that spatial identification of flood hazard	<ol style="list-style-type: none"> Amend the provisions to remove / delete the mapped Hazard

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>management areas are made available through a set of non-statutory maps, which would operate as interactive maps on the Council's GIS website – thereby operating as a separate mapping viewer to the statutory District Plan maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach taken by other Councils around the country.</p>	<p>Management Areas from within the District Plan and instead hold this information in non-statutory GIS maps.</p> <ol style="list-style-type: none"> 2. Delete all references to maps within the District Plan. 3. Undertake any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.
32.	5.4.1.3	Exemptions for daylight recession planes in the Flood Management Area	Support in Part	Kāinga Ora seeks for the applicable daylight recession planes in all residential zones to	Amend rules as follows:

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>be determined as if the ground level at the relevant boundary was the minimum floor level set in the activity specific standards in Rule 5.4.1.1, or natural ground level, whichever is higher.</p>	<p>5.4.1.3 a. For P1 and P2 in Rule 5.4.1.1, the applicable daylight recession plane in residential zones (other than in the Medium Density Residential Zone and High Density Residential Zone) shall be determined as if the ground level at the relevant boundary was the minimum floor level set in the activity specific standards in Rule 5.4.1.1, or natural ground level, whichever is higher.</p> <p>5.4.1.3b. For P3 and P4 in Rule 5.4.1.1, the applicable daylight recession plane in residential zones (other than in the Medium Density Residential Zone and High Density Residential Zone) shall be determined as if the ground level at the relevant boundary was the minimum floor level specified in the Minimum Floor Level Certificate issued under Rule 5.4.1.2, or natural ground level, whichever is higher.</p> <p>5.4.1.3 c</p> <p>viii. Rule 14.5.2.6 Height in relation to boundary – Medium Density Residential Zone</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					ix. Rule 14.6.2.2 Height in relation to boundary – High Density Residential Zone
33.	5.4A	Rules – Qualifying Matter Coastal Hazard Management Areas and Qualifying Matter Tsunami Management Area	Oppose in Part	<p>Kāinga Ora seek that spatial identification of coastal hazard management areas be made available through a set of non-statutory maps, which would operate as interactive maps on the Council’s GIS website – thereby operating as a separate mapping viewer to the statutory District Plan maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach</p>	<ol style="list-style-type: none"> 1. Delete all references in all rules in this section that refer to maps. 2. Include a rule to provide for a Controlled Activity to subdivide within the Tsunami Management Area. 3. Amend Rule 5.4A.5 NC3 as follows: <ol style="list-style-type: none"> a. Development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rules 14.4.1 and 14.4.2. 4. Any consequential amendments to zones, overlays, precincts, and qualifying matters to reflect the relief sought in the submission.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>taken by other Councils around the country.</p> <p>Rule 5.4A.5 NC3 makes development, subdivision and land use that would provide for residential intensification of any site within the Qualifying Matter Tsunami Management Area except that permitted or controlled in Rule 14.4.1 a non-complying activity.</p> <p>Rule 14.4.2 deals with controlled activities so the rule outlined above needs to be amended to reference Rule 14.4.2.</p> <p>There is no applicable rules in the subdivision chapter for the Tsunami Management Area.</p> <p>Rule 14.4.1 provides for up to four residential units to be constructed as a permitted activity. If this level of intensification is provided for, then having a non-complying</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				activity status and an avoid policy seems nonsensical.	
Chapter 6 – General Rules and Procedures					
6.10A – Tree Canopy Cover and Financial Contributions					
34.	6.10A	6.10A Rules 8.3, 8.5.1 and 8.7.12 - Subdivision; Rules 14.4.2 – 14.11.2 – Residential Built Form Standards. 14.6.1.3 RD13. 14.6.2.7 - Landscaping and tree cover.	Oppose	<p>Kāinga Ora welcomes the Council’s recognition of trees as a key element in successful urban environments.</p> <p>Kāinga Ora strongly support the Council increasing its prioritisation of the need to renew streetscapes, especially in areas where intensification has and will continue to occur. Such renewals should include kerb and channel replacement, undergrounding of overhead wires, and street tree planting.</p> <p>Kāinga Ora has substantial concerns with the 20% tree canopy cover target and considers it fundamentally</p>	Delete Section 6.10A and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>unachievable in medium and high density environments on private land. Kāinga Ora consider the requirements to achieve 20% tree canopy cover is inconsistent with the spatial outcome requirements set out in the NPS-UD, and the Medium Density Residential Standard (MDRS) provisions of the Housing Supply Act.</p> <p>Kāinga Ora considers that the proposed financial contribution calculator is complicated and flawed, a simpler formula would be to require 1 tree to be planted per 100m² of site area, as an easier compliance threshold than a trigger of 10% of future canopy cover.</p> <p>It also has concerns with the reliance on Financial Contributions. Given that Council already own extensive areas of park and open space land (including several thousand hectares of land on</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the Port Hills and Red Zone), in addition to extensive road reserve and local park areas, and given that Council takes Development Contributions for new parkland as part of any new development, the need for the land component to form part of the financial contributions appears to be particularly hard to justify.</p> <p>The need to provide rapid canopy cover potentially creates a perverse incentive to plant faster growing exotic species rather than natives. The proposed Financial Contribution could therefore result in a decline in biodiversity by driving developers to plant exotics over natives, with attendant adverse biodiversity outcomes, which is contrary of the desire in the Urban Forest Plan to seek diversity in tree species.</p>	
Chapter 8 – Subdivision, Development and Earthworks					

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
35.		Policy 8.2.2.1 – Recovery activities	Support in Part	<p>PC14 seeks to delete this policy which provides for a range of intensification opportunities in the RS and RSDT zones.</p> <p>Deletion of this policy may well be appropriate if MRZ is properly implemented across all relevant residential zones and the Kāinga Ora submission opposing the Public Transport and Airport Noise Influence Area QMs is confirmed i.e. the only areas which retain low density RS/ RSDT/ RHZ zoning are those subject to a high risk of natural hazards.</p>	Delete the policy as notified.
36.		Policy 8.2.3.2 – Connections to infrastructure	Support	PC14 proposes an additional clause (g) relating to development in the vacuum sewer area. This policy provides for development in the area if connection is able to be made to a part of the waste water system that is not part of the vacuum sewer, or if sufficient capacity can be demonstrated (which could be for example through -on-site	Retain Clause (g) as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				holding tanks and off-peak pumping into the network).	
37.		<p>Tree Canopy and Financial Contribution provisions:</p> <p>Objective 8.2.6 and associated policies;</p> <p>Clause 8.3.1(e)-(f) – how to apply to the rules</p> <p>Clause 8.3.3(b) – financial contributions</p> <p>Clause 8.3.7 – consent notices</p> <p>Clause 8.7.12 – Assessment matters</p>	Oppose	In line with our submission seeking the deletion of the tree canopy financial contribution rules, the related proposed references to tree canopy in the subdivision chapter policies and rules is also opposed.	Delete the provisions relating to the tree canopy financial contribution and associated tree canopy rules.
38.		8.4.1.1 - Notification	Support	Support clause (a)(i) that any controlled or restricted discretionary subdivision application shall not be publicly or limited notified.	Retain 8.4.1.1 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
39.		8.5.1.2 – Controlled activities – C8 and C9	Support	Support controlled activity status for the creation of vacant allotments (C8) or allotments containing an existing or consented dwelling (C9), where these allotments comply with density standards.	Retain C8 and C9 as notified
40.		8.5.1.3 – Restricted discretionary activities – RD2(c) and RD2A	Support	Support restricted discretionary activity status where the proposed allotments do not comply with C8 or C9.	Retain RD2(c) and RD2A as notified.
41.		8.6.1 – minimum dimensions	Oppose	<p>Support the use of a minimum dimension for the creation of vacant sections. However, Kāinga Ora recommends an 8m x 15m minimum shape factor for MRZ and HRZ sites as this is demonstrated as practicable to construct a permitted medium density residential dwelling.</p> <p>The rule needs clarification that the minimum sizes apply to the creation of vacant lots, rather</p>	<p>Amend clause 8.63.1(c) as follows:</p> <p><u>The creation of vacant allotments that do not contain an existing or consented residential unit Allotments</u> in the Medium Density (including MRZ Hills), and High Density Residential Zones, shall <u>have accommodate</u> a <u>minimum dimension shape factor</u> of <u>10m 8m x 15m</u>. <u>Within the Medium Density Residential (Residential Hills Precinct) Zone the allotment shall have a minimum dimension of 17m x 12m.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>than lots with an existing or consented dwelling.</p> <p>Similarly clarity needs to be retained that is explicit that the minimum net site provisions shall not apply to sites used exclusively for access, reserves, or infrastructure, or which are wholly subject to a designation.</p>	<p><u>This shape factor shall be located outside of:</u></p> <ol style="list-style-type: none"> <u>1. Land which may be subject to instability or is otherwise geotechnically unsuitable;</u> <u>2. Any existing or proposed easement areas required for access or services purposes;</u> <u>3. Network Utilities, including private and public lines.</u>
42.		<p>Table 1 – Minimum net site area</p> <p>Clause (a) and (c)</p> <p>Table 6 – Allotments with existing or proposed buildings</p>	Oppose	Kāinga Ora opposes both Table 1 and Table 6 and consider that the minimum shape factor provision proposed above is more appropriate	Delete Table 1 and Table 6.
44.		<p>8.9.2.1 – Earthworks</p> <p>Table 9</p>	Support in Part	<p>Earthworks are permitted through rule 8.9.2.31(P1), provided they comply with the volumes specified in Table 9.</p> <p>Table 9(d) in the Operative Plan limits earthworks to no more</p>	Amend Table 9(d) so the maximum volume is <u>50m³250m³</u> / site <u>net fill above existing ground level</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>than 20m³ in all residential zones. Whilst these volumes do not include earthworks associated with a Building Consent i.e foundation construction, they are invariably triggered through the formation of driveways and landscaping. In practice, a 20m³ limit is frequently triggered for low density suburban development let alone medium density outcomes. As an example a standard driveway for a single dwelling is 4m wide by say 30m long = 120m². To build the driveway requires existing earth to be removed to a depth of 20cm, and then replaced with basecourse prior to being gravelled or asphalted. There is no change to existing ground levels. The cut is 24m³ (120m² x 0.2m depth), with fill being the same, resulting in 48m³.</p> <p>The rule threshold is considered to be unrealistically low, such that it generates numerous consents that are</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>invariably granted. The key effects that need to be controlled with earthworks are erosion and sediment control during construction (although the scale of such works means that they are generally completed within a couple of days and therefore do not generated significant risks of sediment discharge), and permanent changes to finished ground levels that would result in overlooking of neighbouring properties i.e. forming raised mounds or terraces.</p> <p>It is therefore sought that the rule be amended so the volume is net fill above existing ground levels. It is noted that filling within Flood Management Areas is separately controlled in Chapter 5.</p>	
Chapter 12 - Papakāinga/ Kāinga Nohoanga Zone and Chapter 8 subdivision					
45.	12.4.1 and 12.5.1	Activity status tables and built form rules	Support in Part	Kāinga Ora seek that the Papakāinga Zone be retained	Amend the Papakāinga/Kāinga Nohoanga Zone activity table and built

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				as a specific zone, given its unique policy outcomes and function. We seek that the MRZ built form rules however apply to the Papakāinga Zone. The activity status tables and built form standards are sought to therefore be amended to align with MRZ outcomes i.e. the Papakāinga Zone rules controlling matters such as height, boundary setbacks etc should simply align with those in the MRZ.	form standards to align with the built form rules in the MRZ.
46.	Chapter 8	Subdivision provisions relating to the Papakāinga/ Kāinga Nohoanga Zone	Oppose	The suite of subdivision provisions relating to minimum site sizes for the Papakāinga/ Kāinga Nohoanga Zone are sought to also be amended to align with MRZ outcomes.	Amend the subdivision standards for the Papakāinga/ Kāinga Nohoanga Zone to align with MRZ outcomes.
Residential Zone Introduction and Policy Framework – 14.1-14.2					
47.	Residential	14.1(e) Introduction to residential policies	Support in Part	Helpful statement for plan interpretation	Retain statement. Amend reference at the end of the statement to "...subclause g f "

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
48.	Residential	14.2.1 – Objective - housing supply	Support	Support amendments given that Christchurch has moved beyond the immediate earthquake recovery period. Support recognition that the community's housing needs may change, and that provision needs to take into account future needs.	Retain the objective
49.	Residential	Policy 14.2.1.1 – Policy – Housing distribution and density	Support in Part	<p>Support the amendments to clause (a)(ii) and (iii) that clearly state the expectation that high density residential development will be established in both the Central City and in and near identified commercial centres.</p> <p>By amending clause (iii) to now reference high density, the policy is now silent on the locations and expectation of medium density development. Given that the introduction of MRZ across most of the City, there is a need for a clear statement in the policy regarding what is now the normative housing density.</p>	<p>Retain clauses (a)(ii) and (iii).</p> <p>Add a new clause (a)(iv) as follows (with consequential renumbering of subsequent clauses):</p> <p><u>(iv) medium density residential development is established across the majority of the City unless precluded by a qualifying matter.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
50.	Residential	Table 14.2.1.1a – Zone descriptions	Support	The proposed MRZ and HRZ descriptions align with the National Planning Standards descriptions.	Retain zone descriptions
51.	Residential	Policy 14.2.1.2 and 14.2.1.3	Support	Support deletion of these two policies as their original policy direction regarding the location of new medium density areas no longer aligns with the direction in the Enabling Act.	Support the deletion of these two policies.
52.	Residential	Objective 14.2.2 and associated policies 14.2.2.1-14.2.2.4 – short term recovery	Oppose	<p>Given that Christchurch is now some 12 years post-earthquake there may no longer be a need for these policies and associated mechanisms such as the 'Enhanced development mechanism' (EDM) and the 'Community Housing Redevelopment Mechanism'(CHRM).</p> <p>The housing opportunities and more enabling built form standards now provided through the MRZ and HRZ may make this suite of policies and short-term recovery tools unnecessary, however if the</p>	Delete Objective 14.2.2 and associated policies 14.2.2.1-14.2.2.4 and the associated EDM and CHRM in the event that the Public Transport accessibility QM is removed, and the Tsunami Hazard QM reduced to 1:100 year hazard.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				QM are retained and large parts of the city retain RS or RSDT then the EDM and CHRM are sought to remain as important tools.	
53.	Residential	Objective 14.2.3 and associated policies 14.2.3.1-14.2.3.5 - MDRS	Support	The objective and associated policies align with the policies mandated in the Enabling Act.	Retain the objective and associated policies. <i>Note that sequentially Policy 5 (14.2.3.3) should come at the end i.e. the policy 'batting order' should be 1 to 5 rather than the current arrangement of 1,2, 5, 3, 4.</i>
54.	Residential	Policy 14.2.2.2 b. iv. (Recovery housing higher density comprehensive redevelopment)	Oppose	Provided the Airport Noise Influence Area qualifying matter is deleted, the reference in Policy 14.2.2.2 b. iv. to Christchurch International Airport is unnecessary given the relevant land will be zoned for medium density residential development.	14.2.2.2 Policy - Recovery housing higher density comprehensive redevelopment a. Enable and incentivise higher density comprehensive development of suitably sized and located sites within existing residential areas, through an Enhanced development mechanism which provides:... iv. Christchurch International Airport , arterial traffic routes, and railway lines.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
55.	Residential	Policy 14.2.3.6 – Framework for building heights	Oppose	<p>The policy does not provide a framework or rationale for the proposed heights and does not specify what the ‘specific conditions’ might be when taller buildings would be enabled.</p> <p>There is merit in having a policy that clearly articulates the building height hierarchy, with this hierarchy tied to proximity to commercial centres and the size / range of services provided in those centres.</p> <p>The requested amendments also reflect the Kāinga Ora position that Metropolitan Centres be employed within the centres hierarchy, as per the forward-looking aspects of the NPS-UD policies of 1, 3, and 6.</p> <p>These are sought to cover the existing key activity areas for Riccarton, Papanui, and Hornby. Furthermore, the higher density zoning around the city centre and metropolitan centres, are sought to extend</p>	<p>Delete policy and replace with the following:</p> <p><u>Enable building heights in accordance with the planned urban built character for medium and high density areas, whilst also enabling increased building heights under specific conditions.</u></p> <p><u>Encourage greater building height, bulk, form and appearance to achieve high density planned urban form when within the proximity of nearby commercial centres to deliver:</u></p> <ol style="list-style-type: none"> <u>a. At least 10 storey buildings within 1.2km of the Central City and the Metropolitan Centre zones in Hornby, Riccarton and Papanui;</u> <u>b. At least 6 storey buildings in proximity to town centres and medium and large local centres;</u> <u>c. At least 3-4 stories everywhere else in the MRZ.</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				for 1.20 km, with a 400m Height Variation Overlay of 36m sought within 400m of the edge of these centres.	
56.	Residential	Policy 14.2.3.7 – management of increased building heights	Oppose	<p>The MDRS has the height rule as a restricted dictionary activity. MDRS Policy 5 explicitly seeks to ‘provide for developments not meeting permitted activity status, while encouraging high quality developments’.</p> <p>Taller buildings are therefore anticipated as being potentially appropriate subject to a site-specific assessment of effects. The policy needs to properly reflect that taller buildings are anticipated in appropriate locations and where the specific design properly manages the effects generated by the increase in height. As written this policy directly conflicts with Policy 5 of Sub clause 6 of Schedule 3A RMA.</p>	<p>Delete the policy and replace it with:</p> <p><u>Within medium and high density zoned areas, increased building heights are anticipated where:</u></p> <ul style="list-style-type: none"> <u>i. The site has good accessibility to is public and active transport corridors, public open space, and a town or local commercial centre; and</u> <u>ii. The design of the building appropriately manages potential shading, privacy, and visual dominance effects on the surrounding environment.</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Taller residential buildings within 1.2km of the central city can only have a positive economic impact on the CBD by enabling more people to live within walking distance of the town centre. Given the large size of Christchurch, additional enablement of residential opportunities within 1.2km facilitates more people living near the centre i.e. it draws people in, rather than resulting in existing (or potential) CBD residents shifting out.</p>	
57.	Residential	Policy 14.2.3.8 – fire fighting water capacity	Neutral		
58.	Residential	Objective 14.2.5 – high quality residential neighbourhoods	Support in Part	<p>Support the amendments to reference the planned urban character.</p> <p>References to ‘high’ quality in the title and the start of the objective will not always be appropriate or realistic. Use of language around ‘high standard’, ‘high level of amenity’, ‘spacious and</p>	<p>Amend the objective as follows:</p> <p>High Good quality, sustainable, residential neighbourhoods which are well designed, have a high level of amenity, enhance local character and reflect to reflect the planned urban character and the Ngāi Tahu heritage of Ōtautahi.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>attractive pedestrian circulation', 'high levels of glazing' can be used to set a bar that can be unrealistically high (or at least is very subjective). Kāinga Ora support high quality outcomes, however such language is subjective and is an easy stick that can be used by NIMBY opponents to higher density. Invariably multi-unit development involves the balancing of competing design outcomes (which are all perfectly valid), and it comes down to how these are balanced and prioritised – it often isn't possible to tick the optimal outcome across every matter.</p>	
59.	Residential	Policy 14.2.5.1 – Neighbourhood character, amenity, and safety	Oppose	<p>The matters subject to this policy are either captured in the MDRS policies which set the anticipated outcomes for MDRS, or are better articulated through proposed Policy 14.2.5.3 relating to</p>	Delete policy.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>developments of 4 or more units.</p> <p>Policy direction for the remaining low density residential environments is provided through Policies 14.2.5.6-9.</p> <p>This policy therefore duplicates directions which are already better articulated elsewhere in the policy framework</p>	
60.	Residential	Policy 14.2.5.2 – high quality medium density residential developments	Support in Part	<p>Support the amendments to reference the planned urban character.</p> <p>References to ‘high’ quality in the title will not always be appropriate or realistic.</p>	<p>Amend policy as follows:</p> <p>14.2.5.2 Policy – High Good quality, medium density residential development</p> <p>Encourage innovative approaches to comprehensively designed, high good quality, medium density residential development, which is attractive to residents, responsive to housing demands, and provides a positive contribution to its environment (while acknowledging the need for increased densities and changes in residential</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>character) reflects the planned urban built character of an area, through:</p> <ul style="list-style-type: none"> i. consultative planning approaches to identifying particular areas for residential intensification and to defining high good quality, built and urban design outcomes for those areas; ii. encouraging and incentivising amalgamation and redevelopment across large-scale residential intensification areas; iii. providing design guidelines to assist developers to achieve high good quality, medium density development; iv. considering input from urban design experts into resource consent applications; v. promoting incorporation of low impact urban design elements, energy and water efficiency, and life-stage inclusive and adaptive design; and vi. recognising that built form standards may not always support the best design and efficient use of a site for medium density development, particularly for larger sites.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
61.	Residential	Policy 14.2.5.3 – quality large scale developments	Support in Part	<p>The policy is generally appropriate and captures the key design elements necessary to support the good design of more intensive residential complexes.</p> <p>As above, ‘good quality’ is considered to be a more appropriate term than ‘high quality’.</p>	<p>Amend the policy as follows:</p> <p>14.2.5.3 Policy – Good gQQuality large scale developments</p> <p>a. Residential developments of four or more residential units contribute to a high good quality residential environment through site layout, building and landscape design to achieve:</p> <ul style="list-style-type: none"> i. engagement with the street and other spaces; ii. minimisation of the visual bulk of buildings and provision of visual interest; iii. a high good level of internal and external residential amenity; iv. high good quality shared spaces, including communal living spaces and accessways that provide safe, direct access for pedestrians; v. a safe and secure environment; and

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					vi. public through connections for large sites with multiple public frontages.
62.	Residential	Policy 14.2.5.4 – On-site waste storage	Oppose	A policy is not necessary for this level of detail. The matters addressed by the policy are covered at an appropriate level in Policy 14.2.5.3 above.	Delete policy
63.	Residential	Policy 14.2.5.5 – Wind effects	Support in Part	While Kāinga Ora does not oppose the potential need for wind effects to be considered, the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.	<ol style="list-style-type: none"> 1. Retain Policy 14.2.5.5, noting that Kāinga Ora has submitted on provisions relating to wind effects. 2. Move all provisions relating to wind to sit under the General Rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
64.	Residential	Objective 14.2.6 – Medium density residential zone	Oppose	The MDRS objective 2 and Policies 1-5 discussed above (objective 14.2.3 and associated policies 14.2.3.1-14.2.3.5) provide the policy framework for MDRS and as such this objective and associated policy are unnecessary	Delete the objective
65.	Residential	Policy 14.2.6.1 - MDRS	Oppose	As per comments on Objective 14.2.6	Delete the policy
66.	Residential	Policy 14.2.6.2 – local centre intensification precincts	Oppose	As discussed in the section on HRZ height limits, the proposed approach to heights and precincts is unnecessarily complicated. Local Centre Intensification Precincts are well-located for enabling more people to live in close proximity to a range of services. The area covered by this precinct is sought to be simply rezoned to HRZ, and as such this policy is no longer necessary and can be deleted.	<ol style="list-style-type: none"> 1. Delete the policy and associated Local Centre Intensification Precinct from the planning maps. 2. As sought elsewhere in this submission, rezone the land within the Local Centre intensification Precinct to HRZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
67.	Residential	Objective 14.2.7 and associated policies - HDRS	Neutral	It would thematically make more sense for these provisions to be located after the policies on MRZ, which would then lead into the policies on heights and design outcomes	Relocate the HRZ provisions so they are located after the suite of MRZ policies i.e. after Policy 14.2.3.5.
68.	Residential	Objective 14.2.7 and policies 14.2.7.1-14.2.7.3	Support	The objective and policies provide for higher density development in appropriate locations.	Retain the objective and policies.
69.	Residential	Policy 14.2.7.4 and Policy 14.2.7.5	Oppose	As set out elsewhere in this submission, the precinct approach is unnecessarily complicated. A simplified approach is sought through amendments to the HRZ height rules, with this rationalised approach to heights provided with appropriate policy support through Objective 14.2.7 and policies 14.2.7.1-14.2.7.3 (along with Policy 14.2.3.7 as sought to be amended above)	Delete the policies and the associated Large Local Centre Intensification Precincts and the High Density Residential Precincts.
70.	Residential	Policy 14.2.7.6 – High density development	Oppose	The requirement that sites be at least two stories in height may not be appropriate in a range of circumstances and is	Delete the policy.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>unnecessarily complex – there is significant theoretical capacity in these areas so maintaining design flexibility is more important than maintaining capacity.</p> <p>Whilst sites can be amalgamated, there is no requirement for amalgamation.</p> <p>It can be quite appropriate to locate building height and mass away from the road edge in high density environments, depending on site shape, size, orientation, and building design</p>	
71.	Residential	Objective 14.2.8 and policies 14.2.8.1 and 14.2.8.2 – Central City	Support	<p>This Operative Plan objective and associated policies are proposed to be deleted in PC14. This deletion is supported as the policy direction is no longer appropriate, with the purpose of the HRZ near the central city better articulated through the proposed new replacement provisions in 14.2.8 and policies 14.2.8.1 and 14.2.8.2</p>	Support the deletion of these provisions as shown in PC14 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
72.	Residential	<p>Objective 14.2.8 – Future urban zone</p> <p>Associated policies 14.2.8.1 to 14.2.8.7</p>	Support in Part	<p>See comments elsewhere regarding zone labelling. The FUZ label has not been appropriately applied to existing greenfield urban zoned locations – existing urban zoned but unbuilt residential land are sought to be MRZ (unless appropriately justified QM apply). An example of just such an approach is the correct application of a HRZ around the emerging Halswell commercial centre where already zoned RNN land is yet to be built, but has a proposed HRZ applied. In the same way the balance of this RNN area is to have a MRZ applied rather than FUZ.</p> <p>Taking a consistent national view in the application of National Planning Standards, the FUZ zone label is only used in other District Plans for areas that are yet to have an operative urban zone. A FUZ is a ‘holding zone’ that identifies where medium to long term urban growth is anticipated.</p>	<ol style="list-style-type: none"> 1. Delete references to FUZ and relabel existing urban zoned but undeveloped residential land as MRZ (or HRZ if appropriately located proximate to a large commercial centre). 2. Retain the 14.2.8 section as it provides useful direction on how the build-out of greenfield residentially zoned areas is to occur. 3. Amend the objective as follows: <p style="margin-left: 20px;">14.2.8 Objective – <u>Development of greenfield areas</u> Future Urban Zone</p> <p style="margin-left: 20px;">Co-ordinated, sustainable and efficient use and development is enabled in the Future Urban Zone <u>greenfield growth areas</u>.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The FUZ zone provisions are focussed on preventing rural activities from occurring that could prejudice future urbanisation e.g. quarries or intensive farming or lifestyle block subdivision. Invariably the plan frameworks require a further plan change process to be undertaken to activate or 'live zone' a residential zone that can then be developed.</p> <p>The associated policies that guide the build-out of greenfield areas remain appropriate.</p>	
73.	Residential	Policy 14.2.9.4 – Existing non-residential activities	Support in Part	<p>This existing Operative Plan policy has in practice created ambiguity when non-residential sites are proposed to be redeveloped for a different non-residential activity i.e. the reference to 'redevelopment' can be interpreted as only applying to the existing activity having new facilities, rather than enabling the site to be efficiently repurposed for a</p>	<p>Amend the policy as follows:</p> <p>Enable existing non-residential sites activities to continue to be used for a range of non-residential activities and support their redevelopment and expansion provided they do not:</p> <ul style="list-style-type: none"> i. have a significant adverse effect on the anticipated character and amenity of residential zones; or ii. are of a scale or activity that would undermine the role or

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>different type of non-residential activity.</p> <p>With neighbourhoods transitioning to medium density outcomes, it is important that residents have easy access to convenience retail and a range of community facilities. The adaption and repurposing of existing non-residential sites is a useful tool for enabling such provision as part of delivering good quality neighbourhoods.</p> <p>It is accepted that such changes need to be assessed on a case-by-case basis to ensure compatibility with a residential context, with the MRZ and HRZ description both anticipating that such zones will include compatible non-residential activities.</p>	<p><u>function of any nearby commercial centres, undermine the potential for residential development consistent with the zone descriptions in Table 14.2.1.1a.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
74.	Residential	Objective 14.2.12 and Policy 14.2.12.1 – compatibility with industrial activities	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of the QM not outweighing the costs.</p>	Delete Objective 14.2.12 and Policy 14.2.12.1 and the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
75.	Residential	14.3 – how to apply the rules		Kāinga Ora notes that the relevant objectives and policies are still provided for within the Plan and therefore questions the relevance of these if the Community Housing redevelopment mechanism has been deleted.	<p>Consistent with this submission, Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is amended consistent with the relief sought in this submission.</p> <p>Kāinga Ora notes that the relevant objectives and policies are still provided for within the Plan and therefore questions the relevance of these if the Community Housing redevelopment mechanism has been deleted.</p>
14.3 How to interpret and apply the rules					
76.	Residential	14.3 How to interpret and apply the rules – Clause f. xvi.	Oppose	The proposed deletion is consequential to the deletion of the Airport Noise Influence Area qualifying matter, amongst others deleted here and throughout the body of this submission.	<p>f. There are parts of residential zones where the permitted development, height and/or density directed by the MDRS or Policy 3 of the NPS-UD may be modified by qualifying matters. These are identified in detail in Chapter 6.1A and the Planning Maps, and include the following:</p> <p>i. Historic Heritage including heritage items, heritage settings, Residential</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Heritage Area, Residential Heritage Area Interface</p> <p>ii. Riccarton Bush Interface Area</p> <p>iii. Heritage, Significant and other Trees</p> <p>iv. Sites of Ecological Significance</p> <p>v. Outstanding Natural Features and Landscapes</p> <p>vi. Sites of Cultural Significance</p> <p>vii. Residential Character Areas</p> <p>viii. High Flood Hazard Management Area</p> <p>ix. Flood Ponding Management Area</p> <p>x. Coastal Hazard High Risk Management Area and Coastal Hazard Medium Risk Management Area</p> <p>xi. Tsunami Management Area</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					xii. Slope Hazard xiii. Waterbody Setback xiv. Railway Building Setback xv. Electricity Transmission Corridor and Infrastructure xvi. Airport Noise Influence Area xvii. Waste Water Constraint Area xviii. Lyttelton Port Influence Area xix. Low Public Transport Accessibility Area xx. City Spine Transport Corridor xxi. Industrial Interface
14.4 Residential Suburban and RSDT Zone rules					
77.	Residential	14.4.2.2 – Tree and garden planting	Oppose	The proposed amendments to this rule duplicate and confuse the regulatory framework with	Delete the proposed amendments and retain the Operative Plan rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the tree FC rule – essentially it introduces two rules to control the same matter.</p> <p>Kāinga Ora oppose the tree FC rule and this rule amendment for the reasons given in the submission on the tree FC rule.</p> <p>In the event that the tree FC rule is retained, this rule is sought to simply have an advice note directing Plan users to the FC rule and the additional tree canopy outcomes sought in that separate rule.</p>	
78.	Residential	14.4.2.3 - height	Oppose	<p>This rule introduces an 8m height limit if you're in the Riccarton Bush QM and under the Airport Noise Influence Area (which is why it has a RS zoning rather than MRZ).</p> <p>Kāinga Ora have opposed before the extent of the Airport Noise Influence Area and the Riccarton Bush QM and have sought the area around</p>	<ol style="list-style-type: none"> 1. Delete 8m Riccarton Bush height limit. 2. Delete 7m height rule in the Industrial Interface Qualifying matter area and apply relevant MRZ or HRZ heights.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Riccarton Bush is MRZ to the north and HRZ to the south, as such there is no need for an 8m height limit in the RS zone.</p> <p>Separately the height rule also introduces a 7m height limit in the industrial interface QM – which given that this is a rule being applied to the RS and RSDT zones this duplicates an existing situation. Kāinga Ora supports the deletion of this rule and application of relevant MRZ or HRZ zones and heights.</p>	
14.5 Medium Density Zone Rules					
79.	Residential	All controlled and RD rules re notification statements		<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches should be non-notified as it is only the</p>	<p>1. Amend notification statements in both activity and built form rules to align with this logic.</p> <p>Non-notified:</p> <p>14.5.1.3 (RD1) – four or more units</p> <p>14.5.2.2 – landscaping</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>occupant who is affected or passers-by;</p> <p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>14.5.2.5 – Outdoor Living Space</p> <p>14.5.2.8 – Outlook space</p> <p>14.5.2.9 – Fencing</p> <p>14.5.2.10 – Windows to street</p> <p>14.5.2.11 – Minimum unit size</p> <p>14.5.2.12 – Ground floor habitable space</p> <p>14.5.2.13 – Service and storage space</p> <p>14.5.2.15 – Garage and carports</p> <p>14.5.2.16 – Building reflectivity</p> <p>14.5.2.16 – mechanical ventilation</p> <p>14.5.2.18 – Spine road setbacks</p> <p>Open to limited but not public notification:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
80.	Residential	Assessment matters	Oppose	The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. Kāinga Ora seek that they are simplified and consolidated.	<ol style="list-style-type: none"> 1. For the 'non-notified' rules set out above, the matters for assessment are to be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape. 2. For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate. 3. For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height. 4. For the 4+ unit urban design rule, matters of discretion are sought to be as follows: <ol style="list-style-type: none"> a) <u>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>b) <u>The relationship of the development with adjoining streets or public open spaces including the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p>c) <u>Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p>d) <u>The provision of adequate outdoor living spaces, outdoor service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</u></p> <p><u>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
81.	Residential	14.5.1(P1) – Residential activity	support	<p>The proposed amendment to P1 to delete the limit on units with more than 6 bedrooms is supported. The definition of 'residential activity' includes emergency and refuge housing, and sheltered housing and so the amendment better enables such facilities to be established in the MRZ as a permitted activity where they provide accommodation for more than 6 residents.</p> <p>It is noted that boarding houses, student hostels, and retirement villages are separately defined and managed through separate rules.</p>	Retain rule as proposed.
82.	Residential	14.5.1(P3) – Elderly Persons Housing	Support in Part	Need to clarify – the Operative Plan P3 provides a permitted pathway for the conversion of Elderly Persons Housing to general tenure as a permitted activity. The provision of such a pathway is supported. PC14	Either: <ol style="list-style-type: none"> 1. Reinstate P3 so there is a clear permitted pathway; or 2. Include an advice note under P1 as follows:

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>proposes to delete this pathway.</p> <p>The PC14 amendment is ambiguous as to whether the deletion of P3 means that conversion of EPH is no longer permitted, OR is it proposed to be deleted because there is now no such thing as an EPH because MDRS now enables multi-units so it is now implicit that you can convert existing EPH as such conversion would simply fall within the ambit of P1?</p> <p>Given the number of EPH in the City it is important that there is an unambiguous position on how their conversion is to be treated.</p>	<p><u>Conversion of existing Elderly Persons Housing is permitted under P1.</u></p>
83.	Residential	Controlled		<p>PC14 deletes existing rules controlling non-compliance with tree and garden planting, ground floor habitable space, and service spaces. These are all existing Operative Plan rules rather than MDRS rules. Given</p>	<p>Retain controlled activity status Rule 14.5.1.2.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				that they are being retained as built form standards (apart from the overhang rule), the existing controlled activity status are sought to also be retained.	
84.		RD1 – urban design assessment	Support	Support retention of non-notified clause	Retain as notified
85.		RD27 – wind assessment	Oppose	<p>While Kāinga Ora does not oppose the potential need for wind assessments on tall buildings (above 6 storey), the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.</p> <p>Kāinga Ora seeks that the rule provide a permitted pathway. Buildings may separately breach height rules but that is a separate matter (just as they will also invariably require</p>	<ol style="list-style-type: none"> 1. Delete the rule. 2. As an alternative relief in the event that a regulatory approach to wind modelling is retained, redraft the rule to provide for a permitted pathway (for wind effects) where compliance with the specified performance standards is met. 3. Kāinga Ora seeks that the provisions relating to wind effects are moved to sit under the General Rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				consent under RD2 for more than 3 units).	
86.		D11 – industrial interface QM	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be appropriate with the benefits of</p>	Delete the Industrial Interface Qualifying Matter and all associated provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				the QM not outweighing the costs.	
87.		14.5.2.1 – servicing advice note	Support in Part	<p>Servicing constraints mean that whilst resource consent could be granted, Building Consent could be declined if services are not available. Infrastructure constraints need to be readily searchable via on-line tool that can be readily updated, given that CCC presumably know where capacity limits are.</p> <p>The general onus is on Council to address constraints within Council-controlled networks via LTP and DC processes to enable MDRS.</p>	<ol style="list-style-type: none"> 1. Retain the advice note. 2. Kāinga Ora seek that Council investigate the provision of an on-line publicly searchable tool to enable timely identification of site constraints.
88.		14.5.2.2 – Landscaping and tree canopy	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is sought to be deleted and	Delete rule and replace with the following: <u>14.5.2.2 landscaped area.</u> <u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential activities that aligns with the MDRS outcomes.</p>	<p><u>with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p> <p><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></p> <p><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p>
89.		14.5.2.3(i)a - Height	Support	Rule implements MDRS as per Schedule 3A	Retain rule as notified
90.		14.5.2.3(i)b – Height in local centre intensification precincts	Oppose	<p>The Local Centre Intensification Precincts are all located in close proximity to large suburban commercial centres such as Barrington and Bishopdale Malls. These areas are well placed to be HRZ.</p> <p>The areas within this precinct are sought to be rezoned to</p>	Delete clause.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				HRZ and therefore this clause can be deleted.	
91.		14.5.2.3(iv) Industrial interface and (v) Riccarton Bush	Oppose	<p>Kāinga Ora considers that at the interface of industrial and residential zones the onus for managing effects rest primarily with the industrial activity. The interfaces are already existing, with the Operative Plan having long zoned industrial areas adjacent to residential zones for light industrial activities. Invariably industry is required to meet residential zone standards relating to matters such as noise or glare at the zone boundary.</p> <p>Given the existing requirements to comply with residential standards at the zone interface, combined with the General Industrial zone standards that limit heavy industry in these buffer locations, the QM setback is not considered to be</p>	Delete 14.5.2.3(iv) and 14.5.2.3(v).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriate with the benefits of the QM not outweighing the costs.</p> <p>The area around Riccarton Bush is ideally located for supporting a High Density Residential Zone given its close proximity to a large town centre, cycleways, high frequency bus routes, and the large university activity hub</p>	
92.		14.5.2.4 – Building Coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Kāinga Ora support additional exemptions for eaves and guttering, although it is sought that this be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours are controlled through separate</p>	<p>Amend rule as follows:</p> <ol style="list-style-type: none"> a. The maximum building coverage must not exceed 50% of the net site area. b. ... c. <u>Eaves and roof overhangs up to 300mm 600mm in width and guttering up to 200mm in width form the wall of a building shall not be included in the building coverage calculation.</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				rules on internal setbacks and height-to-boundary.	
93.		14.5.2.5 – Outdoor living space	Support	The rule implements MDRS as per Schedule 3A	Retain rule as notified.
94.		14.5.2.6 – Height to boundary	Oppose	The provision as proposed is inconsistent with the MDRS.	Delete and replace with MDRS provision.
95.		14.5.2.7 – Building setbacks	Support in Part	<p>Support clauses (a)(i) and (ii) as implements MDRS as per Schedule 3A.</p> <p>Support clause (iii) enabling eaves and gutters to project into the road boundary setback. Extend the eave exemption to 600mm to align with standard building practice, along with enabling deeper porches which have a strong functional benefit. Such projections have a minimal impact on streetscape amenity and can have benefits through providing greater</p>	<p>1. Retain clause (a)(i) and (ii) as notified.</p> <p>2. Amend clause(a)(iii) as follows:</p> <p>Only road boundary: Eaves, and roof overhangs, and porches to a maximum of 300mm 600mm in width measured from the wall of a building and guttering up to 200mm in width.</p> <p>3. Amend clause (a)(iv) as follows:</p> <p>All other accessory buildings or garages, including garages that internally access a residential unit.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
				<p>articulation in the street-facing facade.</p> <p>Clause (iv) – support reduction in setbacks for accessory buildings, subject to the limitations to height and length in the rule. A grammatical amendment would be helpful to clarify that accessory buildings do not need to have internal access to the dwelling</p>							
96.		14.5.2.8 – Outlook space	Support	The rule implements MDRS as per Schedule 3A. The minor amendment to clause (i)(i) is supported.	Retain the rule as notified.						
97.		14.5.2.9 - Fencing	Support in Part	<p>Support 2m height limit on internal boundary fencing.</p> <p>The proposed rules will result in a significant loss of occupant amenity where outdoor living is located between the unit and the street. Whilst such a layout is not generally preferred, for east-west streets, the units on the southern side of the street</p>	<p>Retain clause (iii) as notified.</p> <p>Delete clauses (i) and (ii) and replace with the following (Operative Plan rule and associated diagrams reinstated):</p> <table border="1" data-bbox="1509 1177 1984 1305"> <thead> <tr> <th data-bbox="1509 1177 1581 1209"></th> <th data-bbox="1581 1177 1825 1209">Fence type</th> <th data-bbox="1825 1177 1984 1209">standard</th> </tr> </thead> <tbody> <tr> <td data-bbox="1509 1209 1581 1305">i</td> <td data-bbox="1581 1209 1825 1305">Where at least 50% of the fence structure is</td> <td data-bbox="1825 1209 1984 1305">1.8m</td> </tr> </tbody> </table>		Fence type	standard	i	Where at least 50% of the fence structure is	1.8m
	Fence type	standard									
i	Where at least 50% of the fence structure is	1.8m									

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
				<p>will face north where it can often result in good design outcomes for the outdoor living to be located between the unit and the street to take advantage of the northern orientation.</p> <p>Retain the Operative Plan rules on road frontage fencing which are well understood by the design community and achieve an appropriate balance in occupant amenity and streetscape outcomes.</p>	<table border="1"> <tr> <td data-bbox="1507 371 1585 435"></td> <td data-bbox="1585 371 1825 435"><u>visually transparent</u></td> <td data-bbox="1825 371 1984 435"></td> </tr> <tr> <td data-bbox="1507 435 1585 592"><u>ii</u></td> <td data-bbox="1585 435 1825 592"><u>Where less than 50% of the fence structure is visually transparent</u></td> <td data-bbox="1825 435 1984 592"><u>1.2m</u></td> </tr> </table>		<u>visually transparent</u>		<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>
	<u>visually transparent</u>										
<u>ii</u>	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>									
98.		14.5.2.10 – Windows to the street	Support in Part	<p>Clause (a) of the rule implements MDRS as per Schedule 3A.</p> <p>Clause (b) re excluding gables is supported.</p> <p>Clause (c) relating to units with large streetscene setbacks is also supported as the large setbacks mean that the streetscene outcomes sought by the rule are less relevant.</p>	<ol style="list-style-type: none"> 1. Retain clauses (a)-(d) as notified. 2. Delete clause (e). 						

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Clause (d) to incentivise front doors and their contribution towards an attractive street façade is supported.</p> <p>Clause (e), whilst trying to be enabling, adds considerable (and unnecessary) complexity to the rule for little gain.</p>	
99.		14.5.2.11 – Minimum unit size	Support	No amendments are proposed to the Operative Plan rule on minimum unit sizes. This rule is well-established and appears to be working well.	Retain rule as notified.
100.		14.5.2.12 – Ground floor habitable room	Support in Part	<p>The Operative Plan includes a rule controlling ground floor habitable rooms which is well-established and appears to be working well.</p> <p>There are two key design outcomes sought, namely 1) the ground floor on the road frontage is habitable space rather than garaging in order to deliver positive streetscape outcomes; and 2) that at least 50% of the ground floor across</p>	<p>Amend the rule as follows:</p> <p>a.— Any building that includes a residential unit shall:</p> <p>i.— Where the residential unit fronts a road or public open space, unless built over a separate ground floor residential unit, have a habitable room located at ground floor level with a minimum internal dimension of 3 metres; and</p> <p>ii.— Any residential unit shall have at least 50% of any ground floor area as habitable rooms.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>the site is habitable space, to avoid the ground floor of complexes being overly dominated by garaging and undercroft parking areas.</p> <p>The proposed rule is sought to be amended to better articulate these two outcomes and to avoid developments arranged as horizontally stacked low-rise apartments being unnecessarily penalised through a requirement for every unit to individually have ground floor space.</p> <p>As all MRZ now has a height limit of 11m or more, clause (b) requires amendment, noting that the outcomes of 50% habitable remains as a valid outcome for the small areas of MRZ that have a height of less than 11m through QMs.</p>	<p>a. <u>Where a residential unit fronts a road or public open space, it shall have a habitable room with a minimum internal dimension of 3 metres located at the ground floor level facing the frontage. This rule does not apply to upper-level units that are built over a separate ground floor residential unit; and</u></p> <p>b. <u>Where the permitted height limit is over 11m (refer to Rule 14.5.2.3), a minimum of 50% of the ground floor area across the site shall be occupied by habitable spaces and/or indoor communal living space. This area may include pedestrian access to lifts, stairs, and foyers.</u></p> <p>c. This rule does not apply to residential units in a retirement village.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
101.		14.5.2.13 - storage	Support in Part	<p>The requirement for outdoor storage for bins and washing lines is an Operative Plan rule that appears to be working well.</p> <p>Clause (a) relating to outdoor storage is supported, although may be an unnecessary level of regulation if this matter is adequately covered by urban design assessment matters.</p> <p>Clause (b) is a new rule in PC14. It requires a minimum amount of internal storage to be provided. Whilst internal storage spaces are useful, this rule is considered to be an unnecessary level of regulation.</p> <p>It is noted that clause (a) only applies to 4 or more units, while clause (b) applies to all units i.e. it is unclear what the rationale is behind the different number of units that trigger the clauses.</p>	<ol style="list-style-type: none"> 1. Retain clause (a). 2. Delete clause (b). 3. Alternatively storage could be addressed as an assessment matter for developments of 4 or more units.
102.		14.5.2.14 – Water supply for fire fighting	Neutral		

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
103.		14.5.2.15 – Garage location	Support in Part	<p>The location of car parking can have a significant impact on streetscape quality. A requirement to recess garaging or carports behind the front building line is supported.</p> <p>It is noted that this rule is only triggered where there are 4 or more units. It also does not apply to surface car parking areas which can also have a significant adverse effect on streetscape. Recessing is only required along the street frontage i.e. the rule must not apply to the front face of units located internally within a site.</p>	<p>Amend the rule as follows:</p> <p>14.5.2.15 garaging and carport building and parking area location</p> <p><u>When developing four or more residential units on a single site, where a residential unit fronts towards a road, any garage, or carport shall be located at least 1.2 metres behind the front façade of a residential unit.</u></p>
104.		14.5.2.16 – Building reflectivity; and RD29	Oppose	<p>New rule that applies to the Residential Hills Precinct – Christchurch as had residential hill suburbs for over 100 years and these areas have not given rise to excessive glare issues from dwellings. Whilst rules controlling reflectivity can be appropriate in rural ONLs where the key outcome is to minimise the visibility of</p>	Delete rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>structures, such an outcome is not appropriate in residential suburbs where housing is an inherent part of the landscape.</p> <p>Requiring low light reflectance values means that buildings have to be finished in dark colours which can exacerbate urban heat island effects and require increased use of air conditioning to reduce unit heating in summer.</p>	
105.		14.5.2.17 – Location of outdoor mechanical ventilation; And RD30	Oppose	<p>New rule that requires a 3m setback if at ground level between a residential unit and the road or a shared accessway. Presumably it is visual effects that are the concern.</p> <p>The rule constitutes a level of design detail that is unnecessary to regulate. If mounted at ground level then even a short 1.2m high fence is sufficient to visually screen in a</p>	Delete the rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>similar manner to the proposed rule on bin storage.</p> <p>As drafted the rule applies to mechanical units on the ground, whereas they would be permitted if wall-mounted despite having a worse visual outcome. It also applies to mechanical units located adjacent to internal boundaries where the property next door (over the fence) has an accessway.</p>	
106.		14.5.2.18 – Spine Road setbacks	Oppose	<p>The new rule requires buildings and outdoor living spaces to be set back 4m from spine road corridors (where the corridor is less than 24m in width, which is the majority of the corridor given 20m road reserves are typical).</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to</p>	<ol style="list-style-type: none"> 1. Delete the rule. 2. If land acquisition for public works is the intent, then Council should initiate a Notice of Requirement to designate the corridor.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
High Density Residential Zone					
107.		Controlled and Restricted Discretionary notification statements	Support in Part	<p>Consistent logic needs to be applied to the notification statements as follows:</p> <p>If the rule controls an internal occupant amenity matter or general street-scape outcomes then rule breaches are sought to be non-notified as it is only the occupant who is affected or passers-by;</p>	<p>Amend notification statements in both activity and built form rules to align with this logic.</p> <p>Non-notified:</p> <p>14.6.1.3 (RD2) – four or more units</p> <p>14.6.2.7 – landscaping</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>If the rule it controls a neighbouring site interface matter then it should be open to an assessment re limited notification but should not be publicly notified. Ltd but not full;</p> <p>If it rule controls a matter that could impact on urban form at a neighbourhood scale e.g. height, then it should be open to a full s95 assessment.</p>	<p>14.6.2.10 – Outdoor Living Space</p> <p>14.6.2.4 – Outlook space</p> <p>14.6.2.5 – Building separation</p> <p>14.6.2.6 – Fencing</p> <p>14.6.2.8 – Windows to street</p> <p>14.6.2.16 – Minimum unit size</p> <p>14.6.2.9 – Ground floor habitable space</p> <p>14.6.2.11 – Service and storage space</p> <p>14.6.2.14 – Garage and carports</p> <p>14.6.2.15 – mechanical ventilation</p> <p>14.6.2.17 – Spine road setbacks</p> <p>Open to limited but not public notification:</p> <p>14.6.2.12 – Building coverage</p> <p>14.6.2.2 – height to boundary</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					14.6.2.3 – internal boundary setbacks 14.6.2.13 – Water for Firefighting (FENZ only) Open to full s95 assessment: 14.6.2.1 – height
108.		Assessment matters	Oppose	The proposed assessment matters for both the '4 or more units' urban design rule and the built form rules are excessive and overlapping. Kāinga Ora seeks that they be simplified and consolidated.	<ol style="list-style-type: none"> 1. For the 'non-notified' rules set out above, the matters for assessment are sought to be limited to the adequate provision of amenity for occupants and the delivery of a functional and attractive streetscape. 2. For the rules that potentially affect neighbouring sites set out above, additional matters relating to consideration of the amenity of neighbouring sites are appropriate. 3. For height, additional matters relating to urban form and proximity to services and public and active transport modes are appropriate, along with consideration of wind effects for buildings over 22m in height.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>4. For the 4+ unit urban design rule, matters of discretion are sought to be as follows:</p> <p>e) <u>Whether the design of the development is in keeping with, or complements, the scale and character of development anticipated for the surrounding area and relevant significant natural, heritage and cultural features.</u></p> <p>f) <u>The relationship of the development with adjoining streets or public open spaces including the provision of landscaping, and the orientation of glazing and pedestrian entrances;</u></p> <p>g) <u>Privacy and overlooking within the development and on adjoining sites, including the orientation of habitable room windows and balconies;</u></p> <p>h) <u>The provision of adequate outdoor living spaces, outdoor</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>service spaces, waste and recycling bin storage including the management of amenity effects of these on occupants and adjacent streets or public open spaces;</u></p> <p>i) <u>Where on-site car parking is provided, the design and location of car parking (including garaging) as viewed from streets or public open spaces.</u></p>
109.		RD2 and RD6 – urban design	Support in Part	<p>RD2 is the Operative Plan rule that requires an urban design assessment for more than 3 units. Clause (a)(i) of the rule implements MDRS as per Schedule 3A.</p> <p>Clause (a)(ii) and (iii) are unnecessary as the assessment of projects that do not comply with garage location and ground floor habitable space are addressed through proposed rule RD20.</p>	<p>Retain clauses (a)(i) and (b)</p> <p>Delete clauses (a)(ii) and (iii).</p> <p>Delete rule RD6</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Given that the purpose of this rule is to enable an urban design assessment, rather than consideration of any built form rule breaches, the retention of the clause (b) 'not limited or publicly notified' clause is supported.</p> <p>Proposed RD6 simply duplicates the assessment required under RD2(a)(i) and therefore is unnecessary and is sought to be deleted.</p>	
110.		RD7 and RD 8 – building heights 14.6.2.1 - Height	Oppose	<p>The approach to managing height is unnecessarily over-complicated and seeks to introduce additional built form rules relating to outdoor living space and internal boundary setbacks as an activity standard.</p> <p>Kāinga Ora seek that the Plan be simplified so that the MRZ has a single height limit rule as per the MDRS (subject to QMs). What is currently the MDRS Local Centre</p>	<ol style="list-style-type: none"> 1. Delete these two activity rules. <p>Replace with:</p> <p><u>Buildings that do not meet Rule 14.6.2.1 Building Height.</u></p> <ol style="list-style-type: none"> 2. Retain matter of discretion reference to 'Impacts on neighbouring property – Rule 14.15.3a'. 3. Delete references to: Town Centre Intensification Precinct; and replace with 'Height Variation Overlay'.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Intensification Precinct is sought to be rezoned to HRZ.</p> <p>The HRZ is sought to have two height limit areas – a 22m limit for the majority of the area taking in what are currently the MRZ Local intensification precinct, and the Large Local Centre Intensification Precinct. The extent of the HRZ is proportionate to the size of the centre so large centres support a greater walkable catchment. But the height enabled in the HRZ remains the same at 22m.</p> <p>HRZ is sought 0-1.20km from the edge of the MCZ and the CCZ.</p> <p>A 36m 'Height Variation Control' is sought to apply 0-400m from the edge of the Metropolitan Centre Zone (as sought within this submission) (Riccarton, Hornby and Papanui centres).</p>	<p>4. Subject to the relief sought above, further consequential changes may be necessary to fully incorporate the effects of the zone changes discussed in the reason related to Metropolitan Centres.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>A 36m 'Height Variation Control' is sought to replace the High Density Residential Precinct and 0-400m from the edge of the CCZ.</p> <p>Rules controlling boundary setback, height to boundary, outdoor living space, and landscaping are all covered by other built form rules. The PC14 height to boundary rule requires at least a 6m setback from boundaries for buildings over 12m.</p> <p>Tall buildings are anticipated in the HRZ and therefore are sought to be permitted up to the height limit. Such buildings will remain subject to an assessment of qualitative urban design outcomes as covered by the urban design assessment matters for 4+ units.</p> <p>Buildings that exceed the height limits are RD, and subject to additional assessment of the</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				built form matters of discretion for height breaches.	
111.	Residential	14.6.1.3 RD13	Oppose	In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is sought to be deleted and replaced with the MDRS standard.	Delete the rule.
112.		RD17	Support in Part	<p>While Kāinga Ora does not oppose the potential need for wind assessments on tall buildings (above 6 storey), the concern lays around appropriateness of Matters of Discretion, the proposed height limits triggering an assessment and technical expertise available to carry out these assessments or determine if assessments (or anticipated effects) are appropriate.</p> <p>The rule should provide a permitted pathway. Buildings may separately breach height</p>	<ol style="list-style-type: none"> 1. Delete the rule. 2. As an alternative relief in the event that a regulatory approach to wind modelling is retained, redraft the rule to provide for a permitted pathway (for wind effects) where compliance with the specified performance standards is met. 3. Kāinga Ora seek that the provisions relating to wind effects are relocated to within the General Rules.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				rules but that is a separate matter (just as they will also invariably require consent under RD2 for more than 3 units).	
113.		D1 and NC1 –education, spiritual, heath, pre-school activities	Support in Part	<p>The Operative Plan has restrictive rules controlling non-residential activities within the City Centre (Four Avenues) due to historic pressure to develop such areas for non-residential use.</p> <p>The HRZ now extends much further than the City Centre, however the restrictive ‘4 Aves’ rules have been carried over so they now apply throughout the HRZ.</p> <p>The HRZ includes areas in close proximity to the larger commercial centres where the provision of a range of community facilities is very appropriate and has long been anticipated and provided for in the District Plan. Easy accessibility to such services</p>	<ol style="list-style-type: none"> 1. Retain Rule D1 for education, spiritual, heath, pre-school activities located inside the Four Avenues. 2. Adopt the MRZ provisions/ activity status for such activities located in the HRZ outside the Four Avenues.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>and facilities is likewise a key element in delivering well-functioning urban environments and good quality high density residential neighbourhoods.</p> <p>Whilst retention of the existing restrictive approach to such facilities inside the Four Avenues may be appropriate, the existing framework in the Residential Medium Density Zone is considered to be more appropriate for the HRZ areas outside of the Four Avenues.</p>	
114.		Add new provisions for retail, office, and commercial service activity on the ground floor of apartment buildings		It is common for apartment buildings to contain a small-scale commercial activity on the ground floor, often adjacent to the entrance foyer and as a means of buffering residential activity from what can be busy frontage roads. The provision of such services can likewise have significant convenience benefits for residents and is consistent with a good quality, high density neighbourhood. The ability to provide shared workspaces in	Add a new restricted discretionary and fully discretionary rule as follows: <p><u>Retail, office, and commercial service activity</u></p> <p><u>a. Activity status: Restricted Discretionary</u></p> <p><u>Where:</u></p> <p><u>i. The retail, office, or commercial service activity is limited to the</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>apartment buildings is consistent with emerging remote working trends where people still seek companionship during the day whilst working remotely from their employer. Provided the scale of non-residential facilities is limited there is minimal potential for such to undermine the role and function of nearby commercial centres which typically cover several hectares.</p>	<p><u>ground floor tenancy of an apartment building;</u></p> <p><u>ii. The gross floor area of the activity/activities does not exceed 200m²; and</u></p> <p><u>iii. The hours of operation are between:</u></p> <p><u>i. 7.00am and 9.00pm Monday to Friday; and</u></p> <p><u>ii. 8.00am and 7.00pm Saturday, Sunday, and public holidays.</u></p> <p><u>The Council's discretion shall be limited to the following matters:</u></p> <p><u>a. The design, appearance and siting of the activity;</u></p> <p><u>b. Noise and illumination;</u></p> <p><u>c. Signage.</u></p> <p><u>2. Activity status: Discretionary</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p><u>Where compliance is not achieved with the matters specified in HRZ-RX(a)(i), (ii) and/or (iii).</u></p>
115.		14.6.2 – Built form standards note	Oppose	<p>The built form rules start with a new note that the standards apply “to all permitted activities and restricted discretionary RD2” i.e. 3+ units.</p> <p>This note is ambiguous as it implies that the built form standards do not apply to any non-residential activities or activities that breach other RD, D or NC rules.</p> <p>It is questionable whether the note is necessary, but if it is to be retained it would be better placed in the ‘how to use the rules’ section. Kāinga Ora seek that it simply state that in addition to being subject to the activity standards, all buildings are also subject to the built form rules.</p>	<p>1. Delete the note. 2. As an alternative relief, if the note is to be retained, then relocate it to the ‘how to use the rules’ section 14.3 as follows:</p> <p><u>In addition to being subject to the activity standards, all buildings are also subject to the built form standards.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
116.		14.6.2.1 - Height	Support in Part	See discussion under RD7 and RD8 above.	Amend clause (a) of the rule as follows: a. Buildings must not exceed 14.22 metres in height above ground level; b. Buildings located in the Height Variation Control overlay must not exceed 36 metres in height above ground level;
117.		14.6.2.2 – Height to boundary	Support in Part	Kāinga Ora supports the encouragement of perimeter block development and building mass at front edge. However there is some concern over if the 20m, or 60% element of the provision is appropriate. For example, the 20m length should be increased to better align with standard block sizes in the High Density Zone. Kāinga Ora is also concerned, while the intent of the rule will achieve desired development outcomes, its drafting could be simplified.	Redraft provisions to improve clarity for plan users and ensure that dimensions referred to in the provision reflects block sizes within the High Density Zone.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
118.		14.6.2.3 - Setbacks	Support in Part	<p>Support clauses (a) and (b)(i) as implements MDRS as per Schedule 3A.</p> <p>Support clause (b)(ii) – support reduction in setbacks for accessory buildings, subject to the limitations to height and length in the rule. A grammatical amendment would be helpful to clarify that accessory buildings do not need to have internal access to the dwelling.</p> <p>Support clause (b)(iii) enabling eaves and gutters to project into the road boundary setback. Extend the eave exemption to 600mm to align with standard building practice, along with enabling deeper porches which have a strong functional benefit. Such projections have a minimal impact on streetscape amenity and can have benefits through providing greater articulation in the street-facing facade.</p>	<p>Retain clause (a) and (b)(i) as notified.</p> <p>Amend clause (b)(ii) and (iii) as follows:</p> <p>(b) This standard does not apply to site boundaries:</p> <p>(i)...</p> <p>(ii) side and rear setbacks: for accessory buildings or garages, including garages that internally access a residential unit, where the accessory building or garage is less than 3 metres in height and the total length of the building does not exceed 10.1m; and</p> <p>(iii) front boundary setbacks: where eaves, and roof overhangs, and porches up to 300mm 600mm in width and guttering up to 200mm in width from the wall of a building intrude into the boundary setback.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
119.		14.6.2.4 - Outlook Space	Support	Support as implements MDRS as per Schedule 3A. Minor amendment to clarify clause (i) is also supported.	Retain rule as notified
120.		14.6.2.5 – Building separation	Support in Part	<p>It is understood that the intent of the rule is to manage built form within the site i.e. the rule is to ensure separation between two towers on the same site, rather than provide separation with buildings on neighbouring sites (as separation to neighbours is managed through a combination of height to boundary, internal boundary setbacks and outlook space rules).</p> <p>The outcome of having reasonable space between taller built elements on the same site is supported, subject to the rule being amended to make its application clear.</p> <p>The other option is to delete the rule and rely on separation being addressed in part through the outlook space rule, plus</p>	<p>Delete the rule and replace as follows:</p> <p><u>Any parts of a building located more than 12m above ground level shall be separated by at least 10m from any other buildings on the same site that are also located more than 12m above ground level.</u></p> <p><u>Or alternatively, delete the rule entirely.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
				urban design assessment matters, and therefore this rule is unnecessary.										
121.		14.6.2.6 - Fencing	Support in Part	<p>Support 2m height limit on internal boundary fencing.</p> <p>The proposed rules will result in a significant loss of occupant amenity where outdoor living is located between the unit and the street. Whilst such a layout is not generally preferred, for east-west streets, the units on the southern side of the street will face north where it can often result in good design outcomes for the outdoor living to be located between the unit and the street to take advantage of the northern orientation.</p> <p>Retain the Operative Plan rules on road frontage fencing which are well understood by the design community and achieve an appropriate balance in occupant amenity and streetscape outcomes.</p>	<p>Retain clause (iii) relating to internal boundaries as notified.</p> <p>Delete clauses (i) and (ii) and replace with the following (Operative Plan rule and associated diagrams reinstated):</p> <table border="1" data-bbox="1509 735 1984 1078"> <thead> <tr> <th></th> <th>Fence type</th> <th>standard</th> </tr> </thead> <tbody> <tr> <td>i</td> <td><u>Where at least 50% of the fence structure is visually transparent</u></td> <td><u>1.8m</u></td> </tr> <tr> <td>ii</td> <td><u>Where less than 50% of the fence structure is visually transparent</u></td> <td><u>1.2m</u></td> </tr> </tbody> </table>		Fence type	standard	i	<u>Where at least 50% of the fence structure is visually transparent</u>	<u>1.8m</u>	ii	<u>Where less than 50% of the fence structure is visually transparent</u>	<u>1.2m</u>
	Fence type	standard												
i	<u>Where at least 50% of the fence structure is visually transparent</u>	<u>1.8m</u>												
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
122.		14.6.2.7 - Landscaping and tree cover	Oppose	<p>In accordance with our submission seeking deletion of the tree canopy financial contribution rule, the landscaping and tree canopy rule is also sought to be deleted and replaced with the MDRS standard.</p> <p>An additional clause is proposed for non-residential activities that aligns with the MDRS outcomes.</p>	<p>Delete rule and replace with the following:</p> <p><u>14.5.2.2 landscaped area</u></p> <p><u>(1) A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p> <p><u>2. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit.</u></p> <p><u>3. Non-residential activities must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them.</u></p>
123.		14.6.2.8 - Windows to street	Support in Part	Clause (a) of the rule implements MDRS as per Schedule 3A.	<p>Retain clause (a)-(d) as notified.</p> <p>Delete clause (e).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Clause (b) re excluding gables is supported.</p> <p>Clause (c) relating to units with large streetscene setbacks is also supported as the large setbacks meant that the streetscene outcomes sought by the rule are less relevant.</p> <p>Clause (d) to incentivise front doors and their contribution towards an attractive street façade is supported.</p> <p>Clause (e), whilst trying to be enabling, adds considerable (and unnecessary) complexity to the rule for little gain.</p>	
124.		14.6.2.9 – Ground floor habitable rooms	Support in Part	<p>The Operative Plan includes a rule controlling ground floor habitable rooms which is well-established and appears to be working well.</p> <p>There are two key design outcomes sought, namely 1) the ground floor on the road</p>	<p>Amend the rule as follows:</p> <p>a. Any building that includes a residential unit shall:</p> <p>i. Where the residential unit fronts a road or public open space, unless built over a separate ground floor residential unit, have a habitable room located at ground floor level</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>frontage is habitable space rather than garaging in order to deliver positive streetscape outcomes; and 2) that at least 50% of the ground floor across the site is habitable space, to avoid the ground floor of complexes being overly dominated by garaging and undercroft parking areas.</p> <p>The proposed rule is sought to be amended to better articulate these two outcomes and to avoid developments arranged as horizontally stacked low-rise apartments being unnecessarily penalised through a requirement for every unit to individually have ground floor space.</p> <p>The outcome of 50% habitable at ground floor across a site is an appropriate outcome for HRZ.</p>	<p>with a minimum internal dimension of 3 metres; and</p> <p>ii. Any residential unit shall have at least 50% of any ground floor area as habitable rooms.</p> <p>a. <u>Where a residential unit fronts a road or public open space, it shall have a habitable room with a minimum internal dimension of 3 metres located at the ground floor level facing the frontage. This rule does not apply to upper-level units that are built over a separate ground floor residential unit; and</u></p> <p>b. have at least 50% of any ground floor area as habitable rooms, except on sites where at least 25% of the building footprint is more than 4 storeys, which shall have at least 30% of any ground floor area as habitable rooms.</p> <p><u>A minimum of 50% of the ground floor area across the site shall be occupied by habitable spaces and/or indoor communal living space. This area may include pedestrian access to lifts, stairs, and foyers.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
125.		14.6.2.10 - Outdoor living space	support	<p>Clauses (a) and (b) implement MDRS as per Schedule 3A</p> <p>Clause (c) provides a useful reduction for studio/ 1 bed units to 15m² (ground floor) or 6m² balcony if located above ground floor.</p>	Retain rule as notified.
126.		14.6.2.11 – Storage space	Support in Part	<p>The requirement for outdoor storage for bins and washing lines is an Operative Plan rule that appears to be working well.</p> <p>Clause (a) relating to outdoor storage is supported, although may be an unnecessary level of regulation if this matter is covered by urban design assessment matters.</p> <p>Clause (b) is a new rule in PC14. It requires a minimum amount of internal storage to be provided. Whilst internal storage spaces are useful, this rule is considered to be an unnecessary level of regulation.</p>	<ol style="list-style-type: none"> 1. Retain clause (a), noting that if outdoor storage is addressed as an urban design assessment matter then a separate rule may be unnecessary. 2. Delete clause (b).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>It is noted that clause (a) only applies to 4 or more units, while clause (b) applies to all units i.e. it is unclear what the rationale is behind the different number of units that trigger the clauses.</p>	
127.		14.6.2.12 - Building coverage	Support in Part	<p>The rule implements MDRS as per Schedule 3A.</p> <p>Support additional exemption for eaves and guttering, although this is sought to be extended to 600mm which is a standard eave depth and better provides for weather tightness design solutions. Eaves do not have a significant impact on visual dominance, and setbacks from neighbours are controlled through separate rules on internal setbacks and height-to-boundary.</p> <p>Clause (a)(ii) seeks to enable greater site coverage in the HRZ. An increase to 60% is supported and is a useful tool in differentiating between MRZ</p>	<ol style="list-style-type: none"> 1. Amend as follows: <ol style="list-style-type: none"> a. <u>The maximum building coverage must not exceed 50 60% of the net site area;</u> <ol style="list-style-type: none"> i. <u>Any eaves and roof overhangs up to 300mm 600mm in width and guttering up to 200mm in width from the wall of a building shall not be included in the building coverage calculation.</u> 2. Delete Clause (a)(ii).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				and HRZ. The proposed clause is however unnecessarily complex, with outdoor space and landscaping both subject to other rules and noting that the proposed ground floor habitable space rule will also necessitate the provision of ground floor outdoor living spaces.	
128.		14.6.2.13 – water supply for fire fighting	Neutral		
129.		14.6.2.14 - Garaging	Oppose	<p>Whilst the equivalent rule in the MRZ requires garaging to be recessed behind the front façade, this rule requires garaging to be located behind the rear façade of a residential unit.</p> <p>This rule is unworkable for carparking levels in apartment buildings where such parking is invariably located beneath (or above) a residential unit rather than behind the unit's rear façade.</p>	<p>Delete the rule and replace as follows:</p> <p><u>14.6.2.14 garaging and carports</u></p> <p><u>Where a residential unit fronts towards a road, any garage or carport shall be located at least 1.2 metres behind the front façade of a residential unit.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>For smaller scale developments ie. 2-3 storey, having parking recessed behind the front façade provides an acceptable outcome, in combination with the urban design assessment matters for 4+ units.</p> <p>The rule wording sought in the equivalent rule in the MRZ is considered to be equally applicable.</p>	
130.		14.6.2.15 – Location of mechanical ventilation	Oppose	<p>New rule that requires a 3m setback if at ground level between a residential unit and the road or a shared accessway. Presumably it is visual effects that are the concern.</p> <p>Level of design detail that is unnecessary to regulate. If mounted at ground level then even a short 1.2m high fence is sufficient to visually screen in a similar manner to the proposed rule on bin storage.</p>	Delete the rule.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>As drafted the rule applies to mechanical units on the ground, whereas they would be permitted if wall-mounted despite having a worse visual outcome. It also applies to mechanical units located adjacent to internal boundaries where the property next door (over the fence) has an accessway.</p>	
131.		14.6.2.16 - Minimum unit sizes	Support	<p>No amendments are proposed to the Operative Plan rule on minimum unit sizes. This rule is well-established and appears to be working well.</p>	Retain rule as notified.
132.		14.6.2.17 - Spine road setbacks	Oppose	<p>The new rule requires buildings and outdoor living spaces to be set back 4m from spine road corridors (where the corridor is less than 24m in width).</p> <p>It is understood that the intention of the rule is to enable road widening in the future to accommodate public rapid transit. If Council's intention is to acquire land in the future to</p>	<p>Delete the rule.</p> <p>If land acquisition for public works is the intent, then Council should initiate a Notice of Requirement to designate the corridor.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>facilitate public works then it should use the designation powers available to it.</p> <p>Given the highly developed nature of these existing corridors with lengthy sections of commercial property built to the road boundary, it is unclear how any corridor-long road widening will occur without major land acquisition and demolition.</p>	
14.7 – Residential Hills Zone					
133.				<p>The Residential Hills zone is an existing Operative Plan zone that covers the Port Hills Suburbs. PC14 as notified includes a QM on public transport accessibility. Areas that fall within this QM retain their existing low-density Operative Plan zoning.</p> <p>It would appear that the public transport QM is the only QM</p>	Delete zone and replace with MDZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				that is generating the need to retain the Residential Hills Zone. Given our submission that the public transport QM is not a valid QM and is sought to be deleted, a consequence is that the Residential Port Hills Zone is also sought to be deleted and replaced by MRZ	
14.12 – Future Urban Zone					
134.				See above discussion on Objective 14.2.8. The Future Urban Zone ('FUZ') is a relabelling of Residential New Neighbourhood Zone. This is the wrong label and not the intention of the National Planning Standards. FUZ are a mechanism for signalling rural areas that will be urbanised at some point in the future as a holding pattern, with the 'live' zone to be developed at a later date through a subsequent plan change process. RNN are existing well-established live	Delete the FUZ and replace with MDRZ. The associated rules relating to build-out of these areas/ compliance with ODPs, or any area-specific rules can equally be located at the end of the MDRZ provisions.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				zones (albeit that some of them are still being built out). These areas are sought to simply be MDRZ unless there is a qualifying matter in play that would preclude MDRZ zoning.	
14.14 – Community Housing Redevelopment Mechanism					
136.	Chapter 14.14 – Community Housing Redevelopment Mechanism	Whole Chapter	Support	Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is consistent with the MDRS and NPS-UD.	Kāinga Ora supports the deletion of the Community Housing Redevelopment Mechanism, provided Plan Change 14 is amended consistent with the relief sought in this submission.
Chapter 15 - Commercial					
137.		Related to the commercial chapter as a whole	Support in part	Kāinga Ora seeks that Metropolitan Centres are introduced within the centres hierarchy, as per the forward-looking aspects of the NPS-UD policies of 1, 3, and 6. These are sought to cover the existing key activity areas for Riccarton, Papanui, and Hornby. The size,	<ol style="list-style-type: none"> 1. Insert reference to Metropolitan Centres in all relevant provisions of the chapter. 2. Insert rules for metropolitan centre zone as attached in Appendix 2.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>scale, existing and future function of these centres are such that they merit the application of a Metropolitan Centre Zone classification, and thus an appropriate objective, policy and rules framework.</p> <p>Further, recent and proposed investment in public and active transport modes along the corridors in which these activity centres are located support the case for a zoning classification reflective of their relative position within the centres hierarchy.</p>	
Chapter 15.2 – Commercial Policy framework					
138.		Policy 15.2.2.1, Table 15.1 – Commercial zone titles	Support in part	<p>Support amendments to Table 15.1 of Policy 15.2.2.1 in so far as these reflect National Planning Standards nomenclature.</p> <p>Kāinga Ora</p>	<p>Realignment of Commercial Zone names with National Planning Standard (NPS) zone descriptions (Chapter 2 Interpretation). The allocation of centres to the NPS labelling appears generally appropriate if Metropolitan Centre is added.</p> <p>B. Town Centre: Key Activity Centre:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Retain reference to '<i>High Density Housing is contemplated ... and around larger local centres</i>'.</p> <p>C. Local Centres: Retain reference to '<i>High Density Housing is contemplated ... and around larger local centres</i>'.</p>
138.		Table 15.1 - Centre hierarchy		<p>The role and function of centres has a direct bearing on the associated geographic extent and zoning of high density residential zoning around the centre. The hierarchy needs to reflect both current condition and potential future state in the event that enabled development occurs.</p> <p>The centre hierarchy for Local Centres in particular is considered to be unnecessarily complex and it is sought that these be simplified, along with a commensurate simplification in the heights and zoning of the surrounding residential area.</p>	<ol style="list-style-type: none"> 1. Amend role and function of Church Corner, Sydenham and Merivale from 'Local Centre (Large)' to 'Town Centre'. 2. Consolidate all Local Centres into a simple category i.e. delete the distinction between 'small' and 'medium'. 3. Incorporate Metropolitan centres and relabel Riccarton, Hornby, Papanui Northlands as such and as shown within Appendix 3.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Church Corner, Sydenham and Merivale are evolving and will be establishing a substantial residential catchment through development enabled by PC14. In addition, these 'centres' are positioned within corridors identified as Mass Transit Network and Growth Corridors within the Greater Christchurch 'Huihui Mai' Consultation Plan for accommodating Growth to 2050. The corresponding Council s32 Report 'Commercial Appendix 2' identifies such centres as performing a greater role in intensification enablement and diversity of function.</p> <p>The large local centres should be town centres, with small and medium local centres merged into a single 'local centre' category.</p>	
139.		Policy 15.2.2.7 – Residential activity in centres	Support in part	Amend so that the provision also provides for residential activity within Neighbourhood centres. Rule 15.5.1.1.1(P19)	Amend Policy 15.2.2.7 as follows: Residential activity in district Town, and

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				provides for such above ground floor, or to the rear of the premises fronting the street.	Local <u>and neighbourhood</u> centres Residential activity in district town , <u>and</u> Local <u>and neighbourhood</u> neighbourhood centres
140.		Objective 15.2.3(b) – Mixed use areas	Support in part	<p>Kāinga Ora support the principle of providing for Mixed Use Zones proximate to the City Centre Zone to transition to higher density residential neighbourhoods.</p> <p>The application of the provision is unclear however. The ‘Objective Heading’ refers to mixed use <u>outside the central city</u>. Central City is defined (in the operative Plan) as that part of the City contained within the four avenues. Whereas the amendment to Chapter 2 Interpretation to introduce ‘City Centre – means the City Centre Zone’.</p> <p>This confusion is then reinforced in Policy 15.2.3.2 where the ‘heading’ references Mixed Use Zones outside the central city, then conflicts with</p>	<p>Amend the objective as follows:</p> <p>15.1.1 Objective - Office parks and mixed use areas <u>outside the central city (except the Central City Mixed Use and Central City Mixed Use (South) Zones)</u>.</p> <p>a. Recognise the existing nature, scale and extent of commercial activity within the Commercial Office and Commercial Mixed Use Zones, but avoid the expansion of existing, or the development of new, office parks and/or mixed use areas.</p> <p>b. <u>Mixed use zones located within a 15min walking distance of close to the City Centre Zone transition into high density residential neighbourhoods that contribute to an improved</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>(b) which references increased opportunities within a 15 minute walking distance of the City Centre Zone (which would therefore include the Commercial Central City Mixed Use and Central City Mixed Use (South Frame) zones). If the aim is to deliberately exclude the Central City Mixed Use and South Frame Zones, this should be made clear, and Policy 15.2.7.1 'Diversity of Activities' amended to encourage a transition into good quality residential neighbourhoods.</p> <p>'Close' should be replaced by explicit reference to the respective zones (presumed to be the 15-minute walking distance in Policy 15.2.3.2(b)).</p> <p>Referencing a reduction in greenhouse gas emissions is superfluous in this context, given proximity and modal choice.</p>	<p><u>diversity of housing type, tenure and affordability</u> and support a reduction in greenhouse gas emissions.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The intent and objectives of these amendments to the plan change do not seem to be achievable through the rules proposed. Kāinga Ora submits that it may be more appropriate to consider these zone changes and rules through a subsequent schedule 1 process.</p>	
141.		Policy 15.2.3.2 – Mixed use	Support in part	<p>Amend ‘outside the central city’ as above.</p> <p>A ‘high quality’ residential neighbourhood is subjective and is referenced in terms of residential zone outcomes (Objective 14.2.4). Such is an inappropriately high threshold for residential development in a transitioning and Mixed Use zone. Contributing positively to quality and design is sufficient.</p> <p>Delete reference to ‘reducing greenhouse gas emissions’ as this would be immaterial at this scale, and the areas are zoned for mixed use which anticipates residential activity being</p>	<p>Amend as follows: 15.2.3.2 Policy – Mixed use areas outside the central city (except the Central City Mixed Use and Central City Mixed Use (South) Zones)</p> <p>a. Recognise the existing nature, scale and extent of retail activities and offices in mixed use zones outside the central city in Addington, New Brighton, off Mandeville Street and adjoining Blenheim Road, while limiting their future growth and development to ensure commercial activity in the City is focussed within the network of commercial centres.</p> <p>b. Support mixed use zones at</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>proximate to necessary facilities / employment thereby reducing trip journeys. Support for greater housing diversity and including 'alternative housing models' although noting that these are not well defined (Chapter 2 Interpretation).</p> <p>The greenway requirements in Appendix 15.15.12 and 15.15.13 are problematic to implement given the fragmented ownership of these areas. The provision of small parks and greenlinks is a matter for Council to facilitate through LGA processes and a more comprehensive place-making programme that will be vital in supporting a shift from industrial to mixed use neighbourhoods. If specific greenlinks are considered to be vital then the Council should use its designation powers to secure these spaces as a more efficient and effective method than the proposed comprehensive housing rules.</p>	<p><u>Sydenham, Addington, off Mandeville Street, and Philipstown located within a 15 minute walking distance of the City Centre Zone, to transition into high good quality residential neighbourhoods by:</u></p> <ol style="list-style-type: none"> i. <u>enabling comprehensively designed high-good-quality, high-density residential activity;</u> ii. <u>ensuring that the location, form and layout of residential development supports the objective of reducing greenhouse gas emissions and provides for greater housing diversity including alternative housing models;</u> iii. <u>requiring developments to achieve a high-good standard of on-site residential amenity to offset and improve the current low amenity industrial environment and mitigate potential conflicts between</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>uses;</p> <p>iv. <u>encourage small-scale building conversions to residential use where they support sustainable re-use and provide high-good quality living space, and contribute to the visual interest of the area.</u></p> <p>c. Avoid Comprehensive Residential Development of sites within the Comprehensive Housing Precinct that are identified in Appendix 15.15.12 and 15.15.13 unless the relevant shared pedestrian/cycleway, greenway or road connection is provided.</p> <p>d. For sites identified within Appendix 15.15.12 and 15.15.13 encourage the connection to facilitate convenient and accessible through block connectivity.</p>
142.		Objective 15.2.4 – urban form	Support	No changes necessary.	Retain the objective as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
143.		Policy 15.2.4.1 – scale and form	Support in part	<p>The foundation of this policy is found within Policy 3 of the NPS – UD. That Policy requires at clause (a) within city centre zones, building heights and density of urban form to realise as much development capacity as possible. Accordingly, the current wording of clause (i) to (v) which seek to limit building height is not supported.</p> <p>For clause (b)(i) the duplication associated with the amendment can be removed.</p> <p>For clause(b)(ii) it is considered that the District Plan should be forward looking, hence the need for building heights to be commensurate with their 'anticipated' role.</p>	<p>1. Amend Clause (a) as follows:</p> <p>15.2.4.1 Policy – Scale and form of development</p> <p>a. Provide for development of a significant scale and form massing that reinforces the City's City Centre Zone's distinctive sense of place and a legible urban form by enabling as much development capacity as possible to maximise the benefits of intensification, whilst managing building heights adjoining Cathedral Square, Victoria Street, New Regent High Street and the Arts Centre to account for recognised heritage and character values. in the core of District Centres and Neighbourhood Centres, and of a lesser scale and form on the fringe of these centres.</p> <p>2. Delete Clause (a)(i)-(v).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>1. Amend Clause (b) as follows:</p> <p>b. The scale and form of development in other commercial centres shall:</p> <ul style="list-style-type: none"> i. reflect the context, character and the anticipated scale of the zone and centre's function by: ii. providing for the tallest buildings and greatest scale of development in the city centre to reinforce its primacy for Greater Christchurch and enable as much development capacity as possible to maximise the benefits of intensification;... <p>2. Retain the remaining parts of clause (b) as notified.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
144.		Policy 15.2.4.2 - design	Oppose	There is no basis within the MDMR Act nor NPS-UD that facilitates or provides support for the inclusion of these provisions. It is considered that the provisions introduced would function to limit or reduce potential development capacity. The provisions are not accompanied by a comprehensive s32, do not adequately recognise the functional requirements associated with commercial developments, and would not be the more appropriate in terms of achieving Objective 3.3.1 and 3.3.2 of the Plan.	Delete all inclusions introduced and retain existing Operative Plan Policy 15.2.4.2.
145.		Policy 15.2.4.6 – Strategic Infrastructure	Support in Part	This policy contains operative plan wordings using the term ‘avoiding’ in relation to noise sensitive activities and the Airport Noise Influence Area, we seek amendment to this wording to reflect management solutions are appropriate.	Amend policy 15.2.4.6 as follows: Provide for the effective development, operation, maintenance and upgrade of strategic infrastructure and avoid adverse effects of development on strategic infrastructure through managing the location of activities and the design of stormwater areas. This includes but is not limited to, managing noise sensitive activities within commercial zones

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					located within the 50 dB Ldn Air Noise Contour and within the Lyttelton Port Influences Overlay Area.
146.		Objective 15.2.5(a)(i)	Support in Part	This policy contains existing Operative Plan wording that's no longer appropriate "...and limiting the height of buildings to support an intensity of commercial activity across the zone".	Amend Objective 15.2.5 as follows: <ul style="list-style-type: none"> a. A range of commercial activities, community activities, cultural activities, residential activities and guest visitor accommodation are supported in the Central City to enhance its viability, vitality and the efficiency of resources, while encouraging activities in specific areas by: <ul style="list-style-type: none"> i. Defining the Commercial Central City Business City Centre <u>Centre</u> Zone as the focus of retail activities and offices and limiting the height of buildings to support an intensity of commercial activity across the zone;

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
147.	Central City	Policy 15.2.6.3 - Amenity	Support in part	<p>Deletion of the operative clause (ii) is supported.</p> <p>Seek deletion or amendment of inserted clause (ii) which acts as a proxy to otherwise limit height contrary to the statutory requirement of Policy 3 of the NPS-UD.</p>	<ol style="list-style-type: none"> 1. Support the deletion of existing clause (a)(ii). 2. Delete the replacement Clause (a)(ii).
148.	Central City	Policy 15.2.6.4 – Residential intensification	Support in part	<p>Seek moderation of the qualifier 'high quality' to either good, or 'positively contributes'.</p>	<p>Amend Policy 15.2.6.4(a) as follows:</p> <p>Encourage the intensification of residential activity within the Commercial Central City Business City Centre Zone by enabling high-good quality residential development that positively contributes to supports a range of types of residential development typologies, tenures and prices, with an appropriate level of amenity including:...</p>
149.	Central City	Policy 15.2.6.5 – Pedestrian focus	Oppose	<p>Delete the PC14 amendment relating to 'wind generation'. It is not considered that the respective s32 analysis demonstrates that such limits/</p>	<p>Amend Policy 15.2.6.5(ii) as follows:</p> <ol style="list-style-type: none"> ii. requiring development to support a

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				wind rules are the most efficient or effective method.	pedestrian focus through controls over building location and continuity, weather protection, height, wind generation , sunlight admission, and the location of parking areas;
150.	Central City Mixed Use Zone	Objective 15.2.7 – central city mixed use	Oppose	Delete insertion of reference to 'high quality' as inappropriate in this context.	15.2.7 Objective – Role of the Central City Mixed Use Zone a. The development of vibrant, high good quality urban areas where a diverse and compatible mix of activities can coexist in support of the Commercial Central City Business City Centre Zone and other areas within the Central City Central City .
151.	Central City Mixed Use Zone	Policy 15.2.7.1 – diversity of activities	Support in part	The Central City mixed use zone is well located within easy walking and cycling distance of the wide range of services and facilities on offer. As such the height limit is sought to reflect such proximity and not be tagged or limited to colocation with large faculties, as the whole of the zone is well-	<u>Amend Clause (a)(viii) as follows:</u> <u>viii. opportunities for taller buildings to accommodate residential activity and visitor accommodation, to support the vibrancy of the City Centre Zone, where co-located with the and the nearby large-scale community facilities, Te Kaha</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				located in close proximity to these facilities.	<u>and Parakiore.</u>
152.	Central City Mixed Use Zone	Policy 15.2.8.1 - usability, Policy 15.2.8.2 - amenity	Oppose	<p>The amenity provisions introduced are too fine grain to be set as policies, are unsubstantiated by s32 analysis, do not respond to a resource management issue, and would act as detriment to development. Kāinga Ora seek that these be deleted.</p> <p>Policy 15.2.8.2(viii) is not opposed, subject to the amendments sought above as to setting an appropriate urban design context, and not set at 'high quality'.</p>	<ol style="list-style-type: none"> 1. Retain Policy 15.2.8.1 as existing in the Operative Plan and delete all PC14 amendments. 2. Retain Policy 15.2.8.2 as existing in the Operative Plan and delete all PC14 amendments, with the exception of clause (viii) which is sought to be retained.
153.	Central City Mixed Use Zone	Policy 15.2.8.3 – residential development	Oppose	The requirements in the NPS-UD to facilitate differing housing typologies and provide intensification opportunities is disabled by provisions seeking excessive private amenity space.	<p>Delete amendments seeking improved private amenity space, compensatory to the predominantly commercial nature of the Central City Mixed Use Zone.</p> <p>15.2.8.3 Policy Residential Development</p> <p>a. provide for ...</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					b. <u>Require a level of private amenity space for residents that is proportionate to the extent of residential activity proposed.</u> and which compensates for the predominantly commercial nature of the area, including consistent with the intended built form and mix of activities within that environment, through:...
154.	Central City Mixed Use Zone (South Frame)	Policy 15.2.10.2 – residential development	Support	Policy amendments appropriately recognise area context.	Retain policy as notified
15.4 – Commercial Zone rules					
155.	Town Centre Zone Rules Local Centre Rules Neighbourhood Centre Zone	City Spine Transport Corridor 15.4.1.3(RD8) 15.5.1.3(RD8) 15.6.1.3(RD7)	Oppose	Delete the provision in its entirety. The provision is not justified in terms of s32, is not the most appropriate mechanism to secure increased road widths, or proxy road reserve planting and landscaping at the expense of developable area. Provision and Qualifying matter is not	Delete all City Spine Transport Corridor activity rules from the suite of commercial zones.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
	Large Format Retail Zone Mixed Use Zone	15.8.1.3(RD3) 15.10.2.10		supported by Policy 4/ clause 3.32 of the NPS-UD. Inconsistency with design outcomes specified in Rule 15.4.2.3, including clause (i) Key Pedestrian Frontages as associated with Riccarton, Church Corner, Merivale and Papanui Centres. If road widening is required to facilitate rapid transit infrastructure then Council should use its designating powers.	
156.	Town Centre Zone Built Form Standards Local Centre Built Form Standards	15.4.2.1(a)(ii) 15.5.2.1(a)(i)	Oppose / cl16(b)	Delete erroneous reference to Local Centre in 15.4.2.1(a)(ii) Delete erroneous reference to Town Centre in 15.5.2.1(a)(i)	ii. 1,000m² GLFA where located in a Neighbourhood Local Centre identified in Policy 15.2.2.1, Table 15.1 ii. 4,000m² GLFA where located in a District Town Centre as identified in Policy 15.2.2.1, Table 15.1; or
157.	Town Centre Zone Built Form Standards	14.4.2.2 Maximum Building Height	Support in part	Increased development capacity is sought to be enabled specifically at Hornby,	1. Adopt Metropolitan Centre Zone Rules proposed in the Kāinga Ora submission Appendix 2 and amend

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought												
				<p>Riccarton and Papanui noting that the role and function of these centres is already straddling that associated with the role and function of Metropolitan Centres as set out within the National Planning Standards. The adoption of the Metropolitan Centre Rules Kāinga Ora seeks would take into account that role and function (including social amenity) would be anticipated to grow and diversify given the anticipated level of residential catchment growth. An appropriate height limit is accordingly 36m.</p> <p>For the remaining Town Centres, noting anticipated corridor growth and development as associated with Sydenham, Merivale and Church Corner (elevating these centres to Town Centres in the retail hierarchy) (refer submission to Table 15.1) a height limit of 22m is the more appropriate.</p>	<p>these rules as appropriate.</p> <p>2. Amend rule 14.4.2.2 as follows:</p> <p>a. The maximum height of any building shall be as follows:</p> <table border="1" data-bbox="1547 603 2002 1023"> <thead> <tr> <th data-bbox="1547 603 1608 660"></th> <th data-bbox="1608 603 1841 660">Applicable to</th> <th data-bbox="1841 603 2002 660">Standard</th> </tr> </thead> <tbody> <tr> <td data-bbox="1547 660 1608 799">i.</td> <td data-bbox="1608 660 1841 799">All sites in a District Town Centre (other than specified below)</td> <td data-bbox="1841 660 2002 799">220 metres</td> </tr> <tr> <td data-bbox="1547 799 1608 963">ii.</td> <td data-bbox="1608 799 1841 963">All sites in a Town Centre at Riccarton, or Hornby or Papanui</td> <td data-bbox="1841 799 2002 963">22 metres</td> </tr> <tr> <td data-bbox="1547 963 1608 1023">iii.</td> <td data-bbox="1608 963 1841 1023">...</td> <td data-bbox="1841 963 2002 1023"></td> </tr> </tbody> </table>		Applicable to	Standard	i.	All sites in a District Town Centre (other than specified below)	220 metres	ii.	All sites in a Town Centre at Riccarton, or Hornby or Papanui	22 metres	iii.	...	
	Applicable to	Standard															
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iii.	...																

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
158.	Town Centre Zone Built Form Standards Local Centre Zone Standards Neighbourhood Centre Zone Standards Large Format Zone Commercial Office Zone Mixed Use Zone City Centre Zone Central City Mixed Use Zone	Sunlight and Outlook 15.4.2.5 15.5.2.5 15.6.2.4 15.8.2.4 15.9.2.4 15.10.2.4 15.11.2.9 15.12.2.6	Oppose in part	Refer submission point relating to amended Recession Planes as a Qualifying Matter and changes to Appendix 14.16.2.	Consequential amendments associated with Appendix 14.16.2. Adopt Metropolitan Centre Zone Rules proposed in the Kāinga Ora submission Appendix 2 and amend these rules as appropriate.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
159.	Town Centre Zone Built Form Standards Local Centre Zone Standards Neighbourhood Centre Zone Standards Large Format Zone Mixed Use Zone City Centre – Mixed Use Zone	City Spine Transport Corridor 15.4.2.10 15.5.2.10 15.6.2.11 15.8.2.13 15.10.1.3 (RD5) 15.12.2.13 / 15.12.1.3(RD6)	Oppose	Delete the provision in its entirety. The provision is not justified in terms of s32, is not the most appropriate mechanism to secure increased road widths, or proxy road reserve planting and landscaping at the expense of developable area. Provision and Qualifying matter is not supported by Policy 4/ clause 3.32 of the NPS-UD.	Delete all City Spine Transport Corridor built form rules from the suite of commercial zones.						
160	Local Centre Zone Built Form Rules – Maximum Building Height	15.5.2.2		Support in part As identified in the submission point on Town Centre heights – Merivale, Church Corner and Sydenham are sought to be elevated to a ‘Town Centre’ zone and provided with a 22m height limit.	Replace the table in 15.5.2.2 as follows (with Merivale, Church Corner and Sydenham elevated in Table 15.1 to Town Centre zoning): <table border="1" data-bbox="1547 1155 1998 1318"> <thead> <tr> <th></th> <th>Applicable to</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>ii</td> <td><u>Ferrymead and all sites in a Local Centre (medium)</u></td> <td><u>20 metres</u></td> </tr> </tbody> </table>		Applicable to	Standard	ii	<u>Ferrymead and all sites in a Local Centre (medium)</u>	<u>20 metres</u>
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought												
				<p>In the alternative, they are sought to be afforded a 22m height limit as Local Centre (Large).</p> <p>As sought above the remaining medium centres and Ferrymeed are sought to become 'large' Local Centres, with the 'small' Local Centres simply being 'local centres'.</p> <p>In terms of heights, the new large centres are sought to have a consistent 22m height limit to provide for additional capacity and conformity with the proposed HRZ height limits adjoining these centres within this submission. The exception is New Brighton, given qualifying matters associated with appropriate natural hazards reduce intensification opportunities.</p> <p>All remaining Neighbourhood Centres are sought to have a standard height limit of 14m to provide a scale commensurate</p>	<table border="1" data-bbox="1547 373 2002 727"> <tr> <td data-bbox="1547 373 1854 528"></td> <td data-bbox="1854 373 2002 528"> <u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u> </td> <td data-bbox="1854 528 2002 727"></td> </tr> <tr> <td data-bbox="1547 528 1854 727">ii.</td> <td data-bbox="1854 528 2002 727"> <u>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</u> </td> <td data-bbox="1854 528 2002 727"> <u>14metres</u> </td> </tr> </table> <p>Or in the alternative:</p> <p>15.5.2.2 Maximum building height</p> <p>a. The maximum height of any building shall be as follows:</p> <table border="1" data-bbox="1547 999 2002 1318"> <thead> <tr> <th data-bbox="1547 999 1597 1058"></th> <th data-bbox="1597 999 1861 1058">Applicable to</th> <th data-bbox="1861 999 2002 1058">Standard</th> </tr> </thead> <tbody> <tr> <td data-bbox="1547 1058 1597 1318">i</td> <td data-bbox="1597 1058 1861 1318"> <u>Merivale, Church Corner and Sydenham North (Colombo Street between Brougham Street and Moorhouse Avenue)</u> </td> <td data-bbox="1861 1058 2002 1318"> <u>22 metres</u> </td> </tr> </tbody> </table>		<u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>		ii.	<u>New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1</u>	<u>14metres</u>		Applicable to	Standard	i	<u>Merivale, Church Corner and Sydenham North (Colombo Street between Brougham Street and Moorhouse Avenue)</u>	<u>22 metres</u>
	<u>as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.</u>																
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ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought															
				<p>with the surrounding MRZ areas and to differentiate from the 12m height limit applying to Neighbourhood Centres.</p>	<table border="1"> <tr> <td data-bbox="1547 368 1592 632">ii</td> <td data-bbox="1592 368 1861 632"> Ferrymead and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton. </td> <td data-bbox="1861 368 2002 632"> 20 metres </td> </tr> <tr> <td data-bbox="1547 632 1592 831">ii.</td> <td data-bbox="1592 632 1861 831"> New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1 </td> <td data-bbox="1861 632 2002 831"> 14 metres </td> </tr> <tr> <td data-bbox="1547 831 1592 903">i.</td> <td data-bbox="1592 831 1861 903"> All sites in a District Centre </td> <td data-bbox="1861 831 2002 903"> 20 metres </td> </tr> <tr> <td data-bbox="1547 903 1592 1094">ii.</td> <td data-bbox="1592 903 1861 1094"> Any building in a District Centre within 30 metres of an internal boundary with a residential zone </td> <td data-bbox="1861 903 2002 1094"> 12 metres </td> </tr> <tr> <td data-bbox="1547 1094 1592 1326">iii. i.</td> <td data-bbox="1592 1094 1861 1326"> All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1. </td> <td data-bbox="1861 1094 2002 1326"> 12 metres </td> </tr> </table>	ii	Ferrymead and all sites in a Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1, excluding New Brighton.	20 metres	ii.	New Brighton and all sites in a Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1	14 metres	i.	All sites in a District Centre	20 metres	ii.	Any building in a District Centre within 30 metres of an internal boundary with a residential zone	12 metres	iii. i.	All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.	12 metres
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i.	All sites in a District Centre	20 metres																		
ii.	Any building in a District Centre within 30 metres of an internal boundary with a residential zone	12 metres																		
iii. i.	All sites in a Neighbourhood Local Centre (small) as identified in Table 15.1 of Policy 15.2.2.1.	12 metres																		

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought									
					<table border="1"> <tr> <td data-bbox="1547 376 1592 443">iv.</td> <td data-bbox="1592 376 1861 443">Other locations</td> <td data-bbox="1861 376 2002 443">17 metres</td> </tr> <tr> <td data-bbox="1547 451 1592 679">ii.</td> <td data-bbox="1592 451 1861 679"><u>All sites in a Neighbourhood Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1.</u></td> <td data-bbox="1861 451 2002 679">14 metres</td> </tr> <tr> <td data-bbox="1547 687 1592 879">iii.</td> <td data-bbox="1592 687 1861 879"><u>All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.</u></td> <td data-bbox="1861 687 2002 879">20 metres</td> </tr> </table>	iv.	Other locations	17 metres	ii.	<u>All sites in a Neighbourhood Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1.</u>	14 metres	iii.	<u>All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.</u>	20 metres
iv.	Other locations	17 metres												
ii.	<u>All sites in a Neighbourhood Local Centre (medium) as identified in Table 15.1 of Policy 15.2.2.1.</u>	14 metres												
iii.	<u>All sites in a Neighbourhood Local Centre (large) as identified in Table 15.1 of Policy 15.2.2.1.</u>	20 metres												
161.	Neighbourhood Centre Zone – Built Form Standards	15.6.2.1 - Height	Support in part	<p>The increase in height of buildings from 8m to 12m is supported.</p> <p>Within the Central City, an increased height to 32m is the more appropriate, given these areas are surrounded by HRZ.</p>	<p>Amend rule 15.6.2.1 as follows:</p> <p>15.6.2.1 Maximum Building Height</p> <p>a. The maximum height of any building shall be as follows:</p> <table border="1"> <thead> <tr> <th data-bbox="1547 1118 1832 1177">Applicable to</th> <th data-bbox="1832 1118 2002 1177">Standard</th> </tr> </thead> <tbody> <tr> <td data-bbox="1547 1185 1832 1254">i. All sites unless specified below</td> <td data-bbox="1832 1185 2002 1254">8 <u>12</u> metres</td> </tr> <tr> <td data-bbox="1547 1262 1832 1331">ii. <u>For sites within the Central City</u></td> <td data-bbox="1832 1262 2002 1331"></td> </tr> </tbody> </table>	Applicable to	Standard	i. All sites unless specified below	8 <u>12</u> metres	ii. <u>For sites within the Central City</u>				
Applicable to	Standard													
i. All sites unless specified below	8 <u>12</u> metres													
ii. <u>For sites within the Central City</u>														

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appropriate and set appropriate limits on activity size to ensure effects of larger facilities are able to be assessed.</p> <p>Such activities do not generally give rise to retail distribution effects, and will not give rise to reverse sensitivity effects given the clear change in outcomes sought for these areas and the enablement of residential activity throughout the mixed use zone.</p>	
163.	Mixed Use Zone	15.10.2.1 - Height	Support in part	<p>The insertion of (b) providing for higher intensity of residential development is supported. However a height limit of 22m is considered the more appropriate for consistency with the height limits proposed within this submission, and appropriate levels of enablement, along with the unnecessary need to differentiate between the heights of buildings depending on where they are located on the site.</p>	<p>Amend rule 15.10.2.1 as follows:</p> <p>Maximum building height</p> <ol style="list-style-type: none"> a. The maximum height of any building shall be 15 metres, <u>unless specified below.</u> b. <u>The maximum height of any Comprehensive Residential Development located within the Comprehensive Housing Precinct (shown on the</u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>planning maps) shall be 21 22 metres, for buildings located adjacent to the street, or 12 metres for buildings located at the rear of the site.</p>
164.	Mixed Use Zone – Comprehensive Residential Development	<p>15.10.1.1(P27)</p> <p>15.10.1.3 (RD3 / RD4) Comprehensive Residential Development</p> <p>15.10.2.9 Minimum Standards for Comprehensive Residential Development.</p> <p>15.14.3.40 Assessment Matters Comprehensive Redevelopment</p> <p>15.10.1.5(NC3)</p> <p>Appendix 15.15.12 – Sydenham and Appendix 15.15.13. Appendix 15.15.14</p>	Oppose	<p>These provisions are overtly complicated, unworkable and provide inappropriate mechanisms to manage development and acquire public laneways (Appendix 15.15.12 – Sydenham and Appendix 15.15.13).</p> <p>Clarity needs to be improved in (P27) that those provisions apply to all MUZ except:</p> <ul style="list-style-type: none"> (i) Blenheim Road / Main South Road 15.10.1.4(D1); and (ii) Comprehensive Housing Precinct (15.10.1.3 (RD3) and (RD4). 	<p>Delete all existing provisions and provide a suite of workable and clear rules that encourage and enable large scale redevelopment.</p> <p>Remove statutory impediments in Appendix 15.15.12 – Sydenham and Appendix 15.15.13 requiring ‘Greenways’ and ‘Shared Pedestrian / Cycleways’ and seek to facilitate through more appropriate means – such as negotiated purchase.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Reference in 15.10.1.3(RD3) to 15.14.3.40(a)(iv) and (v) is incorrect, as these provisions do not exist.</p> <p>The respective matters identified in relation to 15.10.1.3(RD4) are overly excessive and broad.</p> <p>15.10.1.5(NC3) has the statutory function of deeming all Comprehensive Residential Development within the precinct identified for such (at Appendix 15.15.12 and 15.15.13) non-complying. This inconsistency and error needs to be corrected.</p> <p>The matters expressed in 15.14.3.40 are overly excessive and broad (effectively not restricting the matters to be assessed), lack certainty of achievement, and are absent a resource management purpose. Collectively these matters are the antithesis of the achievement of Objective 3.3.1</p>	

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>and Objective 3.3.2 and will disenable investment and redevelopment. Reference is sought to be made to a good quality living environment that positively contributes to local amenity as a high quality environment is contextually unobtainable in a transitioning Mixed Use Environment.</p> <p>The requirements in Appendix 15.15.12 – Sydenham and Appendix 15.15.13. Appendix 15.15.14 are not the most appropriate in terms of s32 of the Act, and will act to disenable redevelopment and the purpose of the Zone.</p>	
165.	Central City Zone	15.11.1.1(P18) – Small buildings	Support	Support the introduction of a permitted pathway for small buildings where the built form rules and activity standards are sufficient to deliver acceptable urban design outcomes and the need for a separate urban design assessment/ consent is able to be avoided.	Retain P18 as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
166.	Central City Zone	15.11.1.2(C1)	Oppose	<p>Additions to C1 are not in accordance with the statutory requirements of the NPS-UD, Sections 77G or 77H of the Resource Management Act, nor Objective 3.3.1 and 3.3.2 of the Plan. The provisions would act as proxies to otherwise reduce development capacity.</p> <p>The Operative Plan controlled activity status for urban design assessments is sought to be retained.</p>	Delete proposed PC14 amendments to the rule i.e. retain the Operative Plan provision.
167.	Central City Zone Central City Mixed Use Zone	Residential Activity 15.11.1.3(RD4) Matters (b) and (c) 15.12.1.3(RD)(b) and (c)	Oppose	Additional controls are unnecessary and inappropriate. These matters are able to be addressed by existing matters (i.e 15.14.2.9(b) and 15.14.2.9(d).	<p>Amend the rule by deleting clauses (b) and (c) as follows:</p> <p>a. Residential activity in the Commercial Central City Business City Centre and Central City Mixed Use Zones – Rule 15.134.2.9</p> <p>b. Glazing – 15.14.3.37</p> <p>c. Outlook spaces – 15.14.3.38.</p>
168.	Central City Zone	Buildings 15.11.1.3(RD5)	Oppose	As a consequential amendment to the relief sought in this submission to delete various	<p>Amend rule by deleting clauses (m) and (n) as follows:</p> <p>m. Upper floor setbacks, tower</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought		
				built form rules, the activity status rule also needs amending to remove reference to rule breaches with the built form rules on wind, upper floor setbacks and tower dimension.	dimension and site coverage – Rule 15.14.3.35 n. – Wind – Rule 15.14.3.39		
169.	Central City Zone	Sunlight and Outlook for the street 15.11.2.3	Oppose	Acts as a proxy to limit development capacity in the Central City in a manner that is not founded in the NPS-UD Policy 3.	Delete rule		
170.	Central City Zone	Building Height – 15.11.2.11	Support in part	<p>There is an inconsistency between the definition of Building Base and the rule. The definition of Building Base is sought to be deleted, as it is internally inconsistent with provisions in the Plan and is uncertain in purpose.</p> <p>Building Base is defined as: <i>'In respect to the City Centre and Central City Mixed Use Zones, means any part of any building that is below the maximum permitted height for that type of building in the zone.'</i></p>	<p>1. Amend definition of Building Base as:</p> <p>Building Base: In respect to the City Centre and Central City Mixed Use Zones, means any part of any building that is below the maximum permitted height for that type of building in the zone.</p> <p>2. Amend rule as follows:</p> <table border="1" data-bbox="1547 1139 2002 1198"> <tr> <td data-bbox="1547 1139 1794 1198">Applicable to</td> <td data-bbox="1794 1139 2002 1198">Standard</td> </tr> </table>	Applicable to	Standard
Applicable to	Standard						

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought						
					<table border="1"> <tr> <td data-bbox="1547 373 1794 935"> i. All buildings, except as provided for in ii, and iii and iv below. </td> <td data-bbox="1794 373 2002 935"> A. The maximum height shall be <u>90 metres.</u> B. The maximum height of the building base shall be 28 metres. in accordance with the Central City Maximum Building Height planning map </td> </tr> <tr> <td data-bbox="1547 935 1794 1158"> ii. All buildings in <u>the heritage setting of New Regent Street as identified in Appendix 9.3.7.2.</u> </td> <td data-bbox="1794 935 2002 1158"> The minimum and maximum height shall be 8 metres. </td> </tr> <tr> <td data-bbox="1547 1158 1794 1326"> iii. All buildings at the Arts Centre, being land bordered by Montreal Street, </td> <td data-bbox="1794 1158 2002 1326"> The maximum height shall be 16 metres. </td> </tr> </table>	i. All buildings, except as provided for in ii, and iii and iv below.	A. The maximum height shall be <u>90 metres.</u> B. The maximum height of the building base shall be 28 metres. in accordance with the Central City Maximum Building Height planning map	ii. All buildings in <u>the heritage setting of New Regent Street as identified in Appendix 9.3.7.2.</u>	The minimum and maximum height shall be 8 metres.	iii. All buildings at the Arts Centre, being land bordered by Montreal Street,	The maximum height shall be 16 metres.
i. All buildings, except as provided for in ii, and iii and iv below.	A. The maximum height shall be <u>90 metres.</u> B. The maximum height of the building base shall be 28 metres. in accordance with the Central City Maximum Building Height planning map										
ii. All buildings in <u>the heritage setting of New Regent Street as identified in Appendix 9.3.7.2.</u>	The minimum and maximum height shall be 8 metres.										
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					<table border="1"> <tr> <td data-bbox="1547 373 1794 507">Worcester Street, Rolleston Avenue and Hereford Street.</td> <td data-bbox="1794 373 2011 507"></td> </tr> <tr> <td data-bbox="1547 507 1794 906"> iv. All buildings within the Cathedral Square Height Precinct </td> <td data-bbox="1794 507 2011 906"> A. The maximum height shall be 45 metres. B. The maximum height of the building base shall be 28 metres. </td> </tr> <tr> <td data-bbox="1547 906 1794 1305"> v. All buildings within the Victoria Street Height Precinct </td> <td data-bbox="1794 906 2011 1305"> A. The maximum height shall be 45 metres. B. The maximum height of the building base shall be 28 metres. </td> </tr> </table>	Worcester Street, Rolleston Avenue and Hereford Street.		iv. All buildings within the Cathedral Square Height Precinct	A. The maximum height shall be 45 metres. B. The maximum height of the building base shall be 28 metres.	v. All buildings within the Victoria Street Height Precinct	A. The maximum height shall be 45 metres. B. The maximum height of the building base shall be 28 metres.
Worcester Street, Rolleston Avenue and Hereford Street.											
iv. All buildings within the Cathedral Square Height Precinct	A. The maximum height shall be 45 metres. B. The maximum height of the building base shall be 28 metres.										
v. All buildings within the Victoria Street Height Precinct	A. The maximum height shall be 45 metres. B. The maximum height of the building base shall be 28 metres.										

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought		
					<table border="1"> <tr> <td data-bbox="1547 373 1789 676"> vi. <u>All buildings in the Central City Heritage Qualifying Matter and Precinct, including the following areas:</u> ... </td> <td data-bbox="1794 373 2002 676"> <u>The maximum height shall be 28 metres.</u> </td> </tr> </table>	vi. <u>All buildings in the Central City Heritage Qualifying Matter and Precinct, including the following areas:</u> ...	<u>The maximum height shall be 28 metres.</u>
vi. <u>All buildings in the Central City Heritage Qualifying Matter and Precinct, including the following areas:</u> ...	<u>The maximum height shall be 28 metres.</u>						
171.	Central City Zone	Maximum Road Wall Height - 15.11.2.12 Building Tower Setbacks - 15.11.2.14 Maximum building tower dimension and building tower coverage – 15.11.2.15 15.11.2.16 Minimum building tower separation 15.11.2.17 Wind	Oppose	<p>These provisions, both individually and collectively act as proxies to restrict height and associated development capacity in the Central City Zone.</p> <p>The retention (and addition) of height rules in the City Centre zone simply does not give effect to the NPS-UD Policy 3 direction to “enable in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification.</p>	Delete all these provisions.		

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>The proposed wind standards are inappropriate (as set between 4m/s to 6m/s more than 5% annually at ground level within 100m of a proposal.) The Technical data used in support of the provision identifies that measured wind levels already typically exceed these levels without development. There is no supporting s32 considering the benefits and costs associated with this provision.</p> <p><i>“Christchurch is a relatively windy city with a background mean wind speed of about 4 m/s (at 10 m above the ground). At the airport for example, the mean wind speed exceeds 4 m/s about 45% of the time, exceeds 6 m/s about 21% of time, and exceeds 8 m/s about 11% of the time”.¹</i></p>	
172.	Central City Mixed Use Zone	15.12.1.1(P16)(a)(iii)	Oppose	Delete as this matter is appropriately managed through	Amend rule by deleting clause (a)(iii).

¹ Technical Advice for Wind Assessments for Christchurch Cit. Meteorology Solutions (2022). [Section 2. Context]

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				screening and controls in Rule 15.12.2.5 'Screening'	
173.	Central City Mixed Use Zone	15.12.1.1(P16)(c)(iii)	Oppose	Requirement is seen as excessive within this context as these areas are not necessarily mutually exclusive.	Amend rule by deleting clause (c)(iii).
174.	Central City Mixed Use Zone	15.12.1.1(P16)(j)	Oppose	This requirement is seen as excessive within this context as a higher density of residential activity should be encouraged, with standards for outdoor and communal living space being used to provide appropriate levels of amenity.	Amend rule by deleting clause (j).
175.	Central City Mixed Use Zone	15.12.1.3(RD2) – Buildings	Oppose	Additional matters of discretion associated with Upper Floor Setbacks, and Glazing are unnecessary and not the more appropriate provisions.	Amend rule by deleting clauses (k) upper floor setbacks and (l) glazing.
176.	Central City Mixed Use Zone	15.12.1.3(RD4) – Four or more residential units	Oppose	Matters of discretion associated with Upper Floor Setbacks, and Glazing are unnecessary and not the more appropriate provisions. The matters in 15.5.1 are considered	Amend rule by deleting clauses (b) outdoor living space and (c) glazing.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				appropriately broad to ensure an appropriate balance between private, communal and public amenity.	
177.	Central City Mixed Use Zone	15.12.2.1 'Street scene, landscaping and trees'	Oppose	The proposed landscaping requirements are excessive and inappropriately reduce development opportunities. The operative plan rule is sought to be retained and PC14 amendments deleted.	Delete PC14 amendments and retain operative plan rule.
178.	Central City Mixed Use Zone	15.12.2.2	Support in part	<p>The maximum height of 32m is supported as being appropriately enabling within a proximate distance to the City Centre Zone.</p> <p>The restrictions associated with the rule are opposed as being unnecessary, in conjunction with the absence of clarity in the definition associated with 'building base' as discussed in this submission.</p>	<p>Amend the rule as follows:</p> <p>15.12.2.2 Maximum building height</p> <p>a. The maximum height of any building shall be in accordance with the height specified <u>Unless identified on the Central City Maximum Building Height planning map the maximum height of any building shall be 32 metres.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>b. The maximum height of any building base shall be 17 metres.</p> <p>b. Any application arising from this rule shall not be limited or publicly notified.</p>
179.	Central City Mixed Use Zone	15.12.2.7 – Minimum setback from the boundary	Oppose	It is considered that the inserted requirements are unnecessary, and unduly constraining.	Delete PC14 amendments and retain operative plan rule.
180.	Central City Mixed Use Zone	15.12.2.9 – Minimum number of floors	Oppose	Whilst a minimum requirement of two floor levels is appropriate in the zone to increase intensity of development, the zone provides for a wide variety of uses, not all of which are appropriate in multi-storey buildings. As such single storey buildings may well be appropriate in a mixed use environment.	Delete proposed rule.
181.	Central City Mixed Use Zone	15.12.2.10 – Building Setbacks	Oppose	Requirements associated with internal setbacks between building towers is unnecessary.	Amend the rule by deleting clauses (b) and (c).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
182.	Central City Mixed Use Zone	15.12.2.11 – Building Tower Coverage	Oppose	Considered unnecessary and would inappropriate disenable development capacity for no sound resource management purpose.	Delete the rule.
183.	Central City Mixed Use Zone	15.12.2.12 – Glazing	Oppose	Considered unnecessary and would inappropriate disenable development capacity for no sound resource management purpose	Delete the rule.
184.	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(a)(iii)	Oppose	Delete as this matter is appropriately managed through screening and controls in Rule 15.12.2.5 'Screening'	Amend the rule by deleting clause (a)(iii).
185.	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(d)(iii)	Oppose	Requirement is seen as excessive within this context as these areas are not necessarily mutually exclusive.	Amend the rule by deleting clause (d)(iii).
	Central City Mixed Use Zone (South Frame)	15.12.1.1(P13)(f)(g)(j)	Oppose	Increasing the extent of setbacks is not more appropriate within this context, revert to the operative Plan rule.	<ol style="list-style-type: none"> 1. Amend the rule by retaining the operative Plan wording for clause (f). 2. Delete clauses (g) and (j).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				Clause (j) is seen as excessive within this context as a higher density of residential activity should be encouraged, with standards for outdoor and communal living space being used.	
186.	Central City Mixed Use Zone – South Frame	15.13.1.3(RD4)	Oppose	Assessment matters for Glazing and Outdoor Space are excessive and appropriate matters are contained within Provision 15.14.2.10.	Amend the rule by deleting clauses (b) - glazing and (c) – outlook.
187.	Central City Mixed Use Zone – South Frame	15.13.1.3(RD5)	Oppose	Assessment matters for Upper floor setbacks and glazing are excessive.	Amend the rule by deleting clauses (l) – upper floor setbacks and (m) – glazing.
188.	Central City Mixed Use Zone – South Frame	15.13.2.1	Support in part	<p>The maximum height of 32m is supported as being appropriately enabling within a proximate distance to the City Centre Zone.</p> <p>The restrictions associated with is opposed as unnecessary, in conjunction with the absence of clarity in the definition associated with ‘building base’</p>	<p>Delete the rule and replace as follows:</p> <p><u>The maximum height of all buildings shall be 32m.</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>as discussed in this submission.</p> <p>The provision as associated with notification is sought to be consistent with that associated with the Central City – Mixed Use zone.</p>	Retain clause (b).
189.	Central City Mixed Use Zone – South Frame	15.13.2.4(f) 'Street scene, landscaping and trees'	Oppose	The requirement for a minimum area of tree canopy of 4m ² is excessive and inappropriately, it reduces development opportunities.	Amend the rule by deleting the PC14 amendments and retaining the Operative Plan rule wording.
190.	Central City Mixed Use Zone – South Frame	15.13.2.10 – Building Tower Setbacks 15.13.2.11 – Building Tower Coverage 15.13.2.12 – Glazing	Oppose	Considered unnecessary and would reduce development capacity for no sound resource management purpose.	Delete rules 15.13.2.10 – tower setbacks, 15.13.2.11 – tower coverage, and 15.13.2.12 -glazing.
191.	Assessment Matters	15.14.3.1	Oppose	Additional assessment matters set out in clause (b) are unnecessary as the key issues are already addressed in clause (a), or are matters to be deleted	Delete clause (b), with the exception of clause (v) (subject to the below amendment): <p style="margin-left: 40px;">v. <u>The individual or cumulative</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>as a consequential amendment in association with the submission seeking the deletion of street wall, wind, and tower rules.</p>	<p><u>effects of shading, visual bulk and dominance, and reflected heat from glass on sites in adjoining residential zones or on the character, quality and use of public open space and in particular the Ōtākaro Avon River corridor, Earthquake Memorial, Victoria Square and Cathedral Square:</u></p>
192.	Assessment Matters	<p>15.14.3.35 – Upper Floor Setbacks</p> <p>15.14.3.36 – height in Central City Mixed Use Zone</p> <p>15.14.3.37 Glazing</p> <p>15.14.3.38 Outdoor Spaces</p> <p>15.14.3.39 Wind</p> <p>15.14.3.40 – Comprehensive Residential Development in the Mixed Use Zones</p> <p>15.14.5.3 City Spine Transport Corridor</p>	Oppose	<p>Additional controls are unnecessary, subjective and overly broad. These matters are all addressed by Rule 15.14.2.6 ‘Urban Design’. Deletion of the assessment matters sought as a consequential amendment associated with the submission seeking the deletion of the upper floor setback rule.</p>	<p>Delete the following assessment matters:</p> <p>15.14.3.35 – upper floor setbacks</p> <p>15.14.3.36 – height in Central City Mixed Use Zone</p> <p>15.14.3.37 Glazing</p> <p>15.14.3.38 Outdoor Spaces</p> <p>15.14.3.39 Wind</p> <p>15.14.3.40 – Comprehensive Residential Development in the Mixed Use Zones</p> <p>15.14.5.3 City Spine Transport Corridor</p>

Appendix 2: Metropolitan Centre Zone Rules

The following Metropolitan Centre Zone Rules set out proposed amendments sought from Kāinga Ora to Plan Change 14, to incorporate rules to enable the classification of Hornby, Papanui and Riccarton as Metropolitan Centre Zones

Proposed changes in zoning are highlighted in dark blue.

MCZ - Metropolitan Centre Zone

The Christchurch Metropolitan Centres are commercial centres with a focal point as sub-regional centres of Papanui, Riccarton and Hornby. They have a planned urban built environment that reflects a high density built form with high-quality public spaces. The Metropolitan Centre Zone provides for a diverse range of commercial, retail, community and recreational activities and offers a variety of employment and living opportunities.

The Metropolitan Centre Zone implements the National Policy Statement on Urban Development, by enabling a built form and density that reflects demand for housing and business use in sub-regional centres.

Activities and buildings along identified active street frontages interact with the streets and public spaces and contribute to a vibrant and attractive metropolitan centre. New buildings and development are well designed and reflect the high-quality urban environment.

Objectives
<p>MCZ-O1 Purpose of the Metropolitan Centre Zone</p> <p>The Metropolitan Centre Zone:</p> <ol style="list-style-type: none"> 1. Is Christchurch’s secondary commercial, civic and community centres; and 2. Accommodates a wide range of commercial, community, recreational and residential activities.
<p>MCZ-O2 Planned urban built environment of the Metropolitan Centre Zone</p> <p>The planned urban built environment of the Metropolitan Centre Zone is characterised by:</p> <ol style="list-style-type: none"> 1. A built form that is compact and reflects the high-density environment of the Metropolitan Centre; 2. A built environment that is versatile, well designed and of high quality and contributes to attractive and safe public spaces; and 3. An urban environment that is an attractive place to live, work and visit.
Policies
<p>MCZ-P1 Appropriate activities</p> <p>Enable activities that are compatible with the purpose of the Metropolitan Centre Zone.</p>
<p>MCZ-P2 Location of residential activity</p> <p>Enable residential activity where:</p> <ol style="list-style-type: none"> 1. It is located above ground floor; and 2. It provides for an ongoing active street frontage with a positive interface with the public space.
<p>MCZ-P3 Health and well-being for residential activity</p> <p>Ensure residential activity and residential units achieve a healthy urban built environment that provides for people’s amenity and well-being in respect of:</p> <ol style="list-style-type: none"> 1. Access to sunlight, daylight and outdoor living space; and 2. Privacy and site design.

<p>MCZ-P4 Other activities</p> <p>Provide for other activities within the Metropolitan Centre Zone where:</p> <ol style="list-style-type: none"> 1. Any significant adverse effects, can be avoided, remedied or mitigated; and 2. The activity is consistent with the planned urban built environment and purpose of the zone.
<p>MCZ-P5 Inappropriate activities</p> <p>Avoid activities that are incompatible with the purpose of the Metropolitan Centre Zone.</p>
<p>MCZ-P6 Small scale built development</p> <p>Enable repairs, alterations and additions to existing buildings and structures, and the erection of smaller-scale buildings and structures, that achieve the planned urban built environment for the Metropolitan Centre Zone.</p>
<p>MCZ-P7 Larger scale built development</p> <p>Provide for high-density development that achieves a quality built form, taking into consideration the following design objectives and the planned urban built environment of the zone.</p> <ol style="list-style-type: none"> 1. Buildings are well-designed and contribute to a high-quality vibrant public realm through visual interest and aesthetic coherence achieved through façade design, materials, and active edges; 2. Buildings abut the street edge and define and enclose the streets, and define the edges of open space; 3. Street corners are legible and enhanced through architectural treatment and form and maximised activity; 4. Pedestrian amenity is maximised through good permeability and activation, which contributes to safety and walkability; 5. Servicing and parking are subservient to the built form to maximise an attractive and active pedestrian interface at the street edge; 6. Servicing plant is integrated within the architectural design, to avoid an ‘add on’ appearance and ensure a well-designed top to buildings; 7. Residential activity is provided with a high quality living environment, including access to privacy, outlook, and sun access; 8. Development responds to the positive contextual elements (existing and potential) including neighbouring buildings, elements such as trees and crossing points in the street
<p>MCZ-P8 Public space interface</p> <p>Where located along an active street frontage identified on the planning maps, require development to provide a positive interface with the public space through:</p> <ol style="list-style-type: none"> 1. Buildings that are built up to the front boundary of the site; 2. Continuous active street frontages; 3. Verandas or other forms of pedestrian shelter; 4. Transparent glazing on the ground floor that allows visibility into and out of commercial frontages and reflects whether it is a primary or secondary frontage; 5. Obvious and highlighted public entrances; and 6. Visually unobtrusive parking, storage and servicing areas, preferably within or to the rear of the building.
<p>MCZ-P9 Car parking and parking lots</p> <p>Only allow for ground level car parking and parking lots where:</p> <ol style="list-style-type: none"> 1. It is not located along a primary frontage identified on the planning maps; and

2. Any adverse effects on the amenity and quality of the streetscape and public open spaces can be minimised.

Rules

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

1. Activity status: **Permitted**

Where:

- a. The gross floor area of the new building, structure or addition to an existing building or structure is no more than 450m²; and
- b. Compliance is achieved with:
 - i. MCZ-S1;
 - ii. MCZ-S2;
 - iii. MCZ-S4; and
 - iv. MCZ-S5.

Except that:

MCZ-S1, MCZ-S4 and MCZ-S5 do not apply to alterations and repairs to existing buildings and structures.

2. Activity status: **Restricted discretionary**

Where:

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

Matters of discretion are restricted to:

1. The matters in MCZ-P7.

Notification:

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

3. Activity status: **Restricted discretionary**

Where:

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

Matters of discretion are restricted to:

1. The matters of discretion of the infringed standard.

Notification:

An application under this rule where compliance is not achieved with MCZ-S2, MCZ-S3, MCZ-S4, or MCZ-S5 is precluded from being publicly

	notified in accordance with section 95A of the RMA.
MCZ-R2	Construction activity 1. Activity status: Permitted
MCZ-R3	Retail activity 1. Activity status: Permitted
MCZ-R4	Commercial service activity 1. Activity status: Permitted
MCZ-R5	Office 1. Activity status: Permitted
MCZ-R6	Entertainment activity 1. Activity status: Permitted
MCZ-R7	Recreation activity 1. Activity status: Permitted
MCZ-R8	Gymnasium 1. Activity status: Permitted
MCZ-R9	Food and beverage outlet 1. Activity status: Permitted
MCZ-R10	Healthcare activity 1. Activity status: Permitted
MCZ-R11	Educational facility 1. Activity status: Permitted
MCZ-R12	Community facility 1. Activity status: Permitted
MCZ-R13	Visitor accommodation 1. Activity status: Permitted
MCZ-R14	Residential activity including Papakāinga/Kāinga Nohoanga 1. Activity status: Permitted Where: a. Compliance is achieved with: i. MCZ-S3.
	2. Activity status: Restricted discretionary

	<p>Where:</p> <p>a. Compliance is not achieved with MCZ-S3.</p> <p>Matters of discretion are restricted to</p> <p>1. The matters of discretion of the infringed standard.</p> <p>Notification:</p> <p>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
	<p>MCZ-R15 Social Housing Complex</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R16 Community corrections activities</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R17 Conservation activity</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R18 Customary harvesting</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R19 Large format retail activity</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R20 Supermarket</p> <p>1. Activity status: Permitted</p>
	<p>MCZ-R21 Emergency service facility</p> <p>1. Activity status: Restricted discretionary</p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MCZ-P4.</p> <p>Notification:</p> <p>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
	<p>MCZ-R22 Retirement village</p> <p>1. Activity status: Restricted discretionary</p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in MCZ-P4.</p>
	<p>MCZ-R23 Parking lot</p> <p>1. Activity status: Restricted discretionary</p>

	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> The matters in MCZ-P9. <p>Notification: An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA</p>
	<p>MCZ-R24 Trade supplier</p> <ol style="list-style-type: none"> Activity status: Discretionary
	<p>MCZ-R25 Drive-through services</p> <ol style="list-style-type: none"> Activity status: Permitted
	<p>MCZ-R26 Any activity not otherwise listed as permitted, restricted discretionary, discretionary or non-complying</p> <ol style="list-style-type: none"> Activity status: Discretionary
	<p>MCZ-R27 Industrial activity</p> <ol style="list-style-type: none"> Activity status: Non-complying
	<p>MCZ-R28 Primary production</p> <ol style="list-style-type: none"> Activity status: Non-complying
	<p>MCZ-R29 Rural activities other than primary production</p> <ol style="list-style-type: none"> Activity status: Non-complying

Standards	
MCZ-S1 Height	
<ol style="list-style-type: none"> All buildings and structures must not exceed a maximum height above ground level of 53m. 	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> The location, design and appearance of the building or structure; Loss of sunlight to adjacent public space; Shading to surrounding buildings; Shading and loss of privacy for any adjacent residential activity; Wind effects on the safety and amenity of the adjacent public space; The planned urban built environment; and Whether an increase in building height results from a response to natural hazard mitigation.
MCZ-S2 Active street frontages	
<ol style="list-style-type: none"> Along building lines identified on the planning maps all buildings must be built up to and oriented towards the identified building line and provide a veranda that: 	<p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> Whether the building promotes a positive interface with the street, community safety and visual interest; Whether the building incorporates landscaping or other means to provide

<ul style="list-style-type: none"> a. Extends along the entire length of the building frontage; b. Provides continuous shelter with any adjoining veranda; and c. Has a minimum setback of 500mm from any kerb face. <p>2. For sites with primary street frontage controls identified in the planning maps:</p> <ul style="list-style-type: none"> a. At least 55% of the ground floor building frontage must be display windows or transparent glazing; and b. The principal public entrance to the building must be located on the front boundary. <p>3. For sites with secondary street frontage controls identified in the planning maps at least 35% of the ground floor building frontage must be display windows or transparent glazing.</p>	<p>increased amenity, shade and weather protection; and</p> <p>3. Whether topographical or other site constraints make compliance with the standard impractical.</p>
<p>MCZ-S3 Location of residential units</p>	
<p>1. All residential units must be located above ground floor.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The amenity and quality of the streetscape; 2. Whether the location of the residential units promote on the an active frontage, community safety and visual interest at the pedestrian level; and 3. Whether the design could facilitate conversion to commercial use so as not to foreclose future options.
<p>MCZ-S4 Location of parking</p>	
<p>1. Any on-site ground level car parking must be located within or at the rear of the building that it serves.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The amenity and quality of the streetscape.

<p>MCZ-S5 Service areas and outdoor storage</p>	
<p>1. Any on-site service area, including rubbish collection areas, and area for the outdoor storage of goods or materials must:</p> <ul style="list-style-type: none"> a. Be located to the rear of the building; and b. Without preventing the provision of a gate or entry point to the site, be fully screened by a 1.8m high fence or landscaping where it is visible from the road or any other public space. 	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> 1. The amenity and quality of the streetscape or public space; and 2. The service and storage needs of the activity.

Appendix 3: Maps

The following maps set out the height amendments sought from Kāinga Ora to Plan Change 14.

Noting that changes to the Residential Suburban and Residential Transition Zone and including the Lyttleton Port Residential Zone has not been shown here.

