

**2 May 2025**

Attn: District Planning Team  
Hutt City Council  
Private Bag 31912  
Lower Hutt 5040

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

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

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

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

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

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

The Proposed Lower Hutt District Plan (“PDP”) in its entirety.

### The Kāinga Ora submission is:

1. Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
  - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
  - b) Support good access to jobs, amenities, and services; and
  - c) Otherwise sustain or enhance the overall economic, social, environmental, and cultural well-being of current and future generations.
2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across the Wellington region.
3. Kāinga Ora therefore has an interest in the PDP and how it:
  - i. Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
  - ii. Minimises barriers that constrain the ability to deliver housing development across the public housing, affordable housing, affordable rental, and market housing; and
  - iii. Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. Whilst overall, Kāinga Ora is supportive of the PDP, the following amendments to the PDP are sought to ensure provisions are enabling of development that is reflective of the respective zoning framework:

#### (a) Three Waters

- i. Whilst Kāinga Ora support the use of water sensitive design, it recognises that site constraints can either limit soakage and/or impede the space needed for

onsite solutions. The rule framework also does not provide for other engineering solutions to be used or considered if water sensitive design cannot be achieved. An example of this is the Hutt Valley floor which is limited in terms of water sensitive design solutions due to the high groundwater table limiting on site soakage. Kāinga Ora therefore seek changes to the policy and rule framework for alternatives to be considered.

***(b) Transport***

- i. Kāinga Ora seek amendments to the permitted activity threshold for trip generating activities to firstly tie to the number of car parking spaces rather than number of units proposed. This recognises that smaller units may not be provided carparks and also does not consider the location of a development (i.e. near to centres or public transport). Further amendments are sought to distinguishing the degree of information required within a traffic impact assessment relative to the degree the trip generation rules are infringed.
- ii. Kāinga Ora considers that limiting the amount of vehicle crossings to 1 per 50m of frontage as a permitted activity is far too restrictive and does not reflect the established lot layout of existing communities or the medium and high-density living intentions of the PDP. Kāinga Ora consider that the location and separation of vehicle crossings is adequately addressed within TR-S6 and therefore seeks deletion of TR-S5(1) and (2).

***(c) Financial Contributions***

- i. Kāinga Ora is concerned that the financial contributions for providing and/or upgrading services and infrastructure are duplicating the charges required through payment of development contributions and act as a secondary charge on development and therefore seek the deletion of provisions requiring the payment of financial contributions for infrastructure.

***(d) Earthworks***

- i. Kāinga Ora seek that the permitted threshold for earthworks in residential zones is increased to 500m<sup>2</sup>. Kāinga Ora consider that the threshold for earthworks to be too low. Earthworks at this scale can easily be managed through appropriate standards including requirements for sediment and erosion control.

- ii. Kāinga Ora seek the deletion of EW-S4. Kāinga Ora oppose the introduction of a rule restricting the volume of cut/fill material being transported off/onto a site. This matter can be appropriately considered as a matter of discretion when EW-S1 is exceeded and appropriate standard conditions regarding tracking etc can then be included within a resource consent.

**(e) Wind**

- i. Kāinga Ora seek that the threshold for a wind assessment should be aligned throughout all zones and therefore seeks that the minimum height threshold is aligned with the City Centre and Metropolitan Centre zones being 22m. Kāinga Ora consider that requiring a wind assessment for buildings exceeding 12m within all other zones is not necessary and adds additional consenting hurdles and costs for limited or no benefit. Kāinga Ora also questions the difference in height thresholds between the zones.

**(f) Zones**

- i. Kāinga Ora generally supports the objectives and policies proposed in the Medium Density and High-Density Residential Zones. However, Kāinga Ora seeks amendments to some of the policies to be more concise and considers that some of the clauses within the policy chapeau is more suitable as assessment criteria. Kāinga Ora also opposes the inappropriate use of the word 'avoid' as an absolute measure.
- ii. Kāinga Ora opposes the introduction of permeable surfaces within MRZ-S7 and considers that the Landscaped Areas rule (as required by the MDRS) provides adequate control.
- iii. Kāinga Ora seeks amendments to HRZ-P4 to recognise the planned built form in the zone, which should be enabling of a greater intensity of development and therefore seeks that the reference to 'low rise apartments' should be amended to reflect this. Further, Kāinga Ora seeks a more enabling HIRB rule within the HRZ to reflect the intended built form.
- iv. Kāinga Ora generally supports the objectives and policies proposed in the Mixed-Use Zone (MUZ) chapter of the PDP. However, Kāinga Ora seeks amendments to some of the policies to be more concise and considers that

some of the information is more suitable as assessment criteria. Kāinga Ora also opposes the use of the word ‘avoid’ as an absolute measure. MUZ-P3 includes ambiguous words that are open to interpretation and do not include a definition. Kāinga Ora also supports residential activities being Permitted Activities in the MUZ, subject to compliance with the relevant standards.

***(g) Mapping – 308 Waiwhetu Road.***

- i. Kāinga Ora seeks the zoning of 308 Waiwhetu Road is amended to Mixed Use Zone (MUZ) and opposes the ‘Active Street Frontage’ overlay. Kāinga Ora considers that the subject site is more appropriately zoned as MUZ than the Neighbourhood Centre zone with the removal of the Active Street Frontage Overlay:
    - a) The site abuts properties that have been rezoned MUZ under the PDP. None of these sites have the Active Street Overlay. The site is considered contiguous of the Mixed Use Zone to the east.
    - b) The site is separated from Local Centre Zone land, which is located on the eastern (opposite) side of Waiwhetu Road.
    - c) No other sites along the western side of Waiwhetu Road are subject to the Active Street Overlay, which makes the intent of the overlay devoid.
  - ii. Kāinga Ora considers that the Local Centre Zone creates a more restrictive development framework for 308 Waiwhetu Road, preventing it from being developed for residential development or a broader scope of commercial activities.
5. The changes Kainga Ora have made through this submission are sought to:
- i. Ensure that Kāinga Ora can carry out its statutory obligations;
  - ii. Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991, and relevant national direction and regional alignment;
  - iii. Ensure that the s32 analysis has appropriately analysed and considered other reasonable options to justify the proposed plan provisions;
  - iv. Provide clarity for all plan users; and

- v. Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.
6. The Kāinga Ora submissions and changes sought can be found within **Appendix 1** which forms the bulk of the submission.

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

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

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

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its submission on the Proposed Lower Hutt District Plan to address the matters raised in its submission.



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

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## Appendix 1: Decisions sought Proposed Lower Hutt District Plan

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

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

Table 1

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
<b>General Submission Points</b>					
1.	Zoning and Mapping	308 Waiwhetu Road	Oppose in part	<p>Kāinga Ora opposes the zoning of 308 Waiwhetu Road as Local Centre Zone and further opposes the 'Active Street Frontage' Overlay that the site is subject to and seeks that the site is zoned as Mixed Use Zone for the following reasons:</p> <ul style="list-style-type: none"> <li>- The site abuts properties that have been rezoned MUZ under the PDP. None of these sites have the Active Street Overlay.</li> <li>- The site is separated from Local Centre Zone land, which is located on the eastern (opposite) side of Waiwhetu Road.</li> <li>- No other sites along the western side of Waiwhetu Road are subject to the Active Street Overlay, which makes the intent of the overlay devoid.</li> </ul>	Kāinga Ora seeks that 308 Waiwhetu Road is zoned as Mixed Use Zone and that the Active Street Front Overlay is removed.



ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
<b>Three Waters</b>					
2.	Three Waters	THW-O1 Infrastructure-enabled urban development	Support	Kāinga Ora supports this objective as proposed and in particular the provision to provide for alternative means to service use and development.	<i>Retain THW-O1 as notified.</i>
3.	Three Waters	THW-P1	Support in Part	Kāinga Ora generally supports this policy, although considers clause 1 is already provided for in a more appropriate manner in policy THW-P2.	<p><i>Amend THW-P1 as follows.</i></p> <p>Enable use and development in urban areas that is serviced by existing three waters infrastructure which:</p> <ol style="list-style-type: none"> <li><del>1. Meets the requirements of the Wellington Water Regional Standard for Water Services, December 2021, Version 3.0,</del></li> <li>Has sufficient capacity to accommodate the use, or development, and</li> <li>Either exists prior to the commencement of construction or is <b>proposed to be</b> installed in conjunction with the proposed development.</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
4.	Three Waters	THW-P2 Three waters infrastructure capacity	Support in part	Kāinga Ora supports this policy particularly allowing for acceptable alternative solutions to allow for use and development in urban areas with insufficient existing three waters capacity, although considers in the District Plan it is appropriate to refer to “relevant” requirements as some requirements relate to other regulatory processes.	<p><i>Retain THW-P2 as notified.</i></p> <p>Only allow for use, and development in urban areas with insufficient existing three waters capacity and/or level of service where:</p> <ol style="list-style-type: none"> <li>1. The required three waters network is constructed prior to or in conjunction with the proposed development, or</li> <li>2. It can be demonstrated there is an acceptable alternative solution that: <ol style="list-style-type: none"> <li>a) Provides a comparable level of service to the use or development as outlined in <b>the relevant</b> Wellington Water Regional Standard for Water Services, December 2021, Version 3.0,</li> <li>b) Does not result in increased flood risk, increased wastewater overflows or reduced water pressure in the reticulated water network, and</li> <li>c) Will not generate any additional demand that compromises the ability of the network to service other permitted or established activities within the immediate area.</li> </ol> </li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
5.	Three Waters	THW-P4 Water sensitive design	Oppose in part	<p>Kāinga Ora generally supports the policy with amendments to provide the flexibility where practicable to achieve such outcomes as not all developments can achieve and attain all aspects in design and layout.</p> <p>The proposed amendments also reflect the assessment criteria within THW-R3(6) where site constraints are considered that may prevent water sensitive design.</p>	<p><i>Amend Policy THW-P4 as follows:</i></p> <p><b>Encourage and promote</b> <del>Require</del> new development in urban areas (except for commercial and mixed use zones) to incorporate water sensitive design methods and to be designed, constructed and maintained to:</p> <ol style="list-style-type: none"> <li>1) <b>Manage activities to avoid and where that is not possible, or</b> mitigate off-site effects from surface water runoff, and</li> <li>2) Be in accordance with best practice solutions for the management of stormwater quality and quantity from the development.</li> </ol>
6.	Three Waters	THW-R3 New buildings (excluding accessory buildings) in an Urban Zone – Water Sensitive Design	Support in part	<p>Kāinga Ora generally supports the policy with amendments to provide the flexibility where practicable to achieve such outcomes as not all developments can achieve and attain all aspects in design and</p>	<p><i>Amend THA-R3.3 as follows:</i></p> <p><i>Matters of discretion are restricted to:</i></p> <ol style="list-style-type: none"> <li>1. The relevant sections of the Wellington Water - Water Sensitive Design for</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
				layout.	<p>Stormwater: Treatment Device Design Guideline, December 2019, Version 1.1.</p> <ol style="list-style-type: none"> <li>The relevant matters in THW-P4: Water sensitive design.</li> <li>The design, location, efficiency and effectiveness of water sensitive design methods.</li> <li>The ownership, maintenance and operation arrangements for the water sensitive design methods from the site.</li> <li>The inclusion of stormwater retention to reduce, as far as reasonably practicable, the increase in stormwater runoff volume post development.</li> <li>Any site constraints that may prevent water sensitive design methods from being constructed on the site.</li> <li>Any wider public water sensitive design treatment devices that the stormwater from the site may discharge into, thereby providing treatment prior to discharging into a water body.</li> <li><b><u>Any alternative engineering solutions that mitigate any adverse effects of stormwater discharge from the site.</u></b></li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<b><u>Note: An approved solution is one which meets the requirements of one of the acceptable solutions in the Wellington Water Managing Stormwater Runoff – The Use of Approved Solutions for Hydraulic Neutrality.</u></b>
<b>Transport</b>					
7.	Transport	TR-R3.2 All Activities – Trip generation  Restricted Discretionary	Oppose in part	Kāinga Ora consider that that the degree of traffic impact assessment required for a restricted discretionary activity should vary dependent on the degree of exceedance.  These sought changes also tie in with the submission on Table 8 as below.	<p><i>Amendments sought:</i></p> <p>Information Requirements:</p> <p>Applications made under this rule must include an Integrated Transport Assessment prepared by a suitably qualified traffic engineer or transport planner.</p> <p><b><u>The Integrated Transportation Assessment shall be in detail that corresponds with the scale and significance of the effects that the proposed activity may have on the environment.</u></b></p> <p><b><u>Basic Assessment – 51-60 new or additional carparks</u></b></p> <p><b><u>Confirmation of how the development complies with the relevant Transportation Rules;</u></b></p>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<p><u>Where there is a small degree of non-compliance an assessment of effects identifying any potential adverse effects on public realm, movement networks, safety and security, and/or on the transport network and any measures required to avoid, remedy or mitigate those adverse effects adjacent to the site.</u></p> <p><u>Local Assessment – 61-100 carparks</u></p> <p><u>This will discuss the transport effects relating to the public realm, movement networks, safety and security, and the transport network (including the function of roads as identified in the road hierarchy) and identify existing conditions and compare the predicted effects of the development. Any measures required to avoid, remedy or mitigate adverse effects should be identified.</u></p>
8.	Transport	TR-S5 Vehicle crossings – Number, location and width	Oppose in part	Kāinga Ora considers that one entrance per 50m introduces a restrictive standard to the residential zone and	<p><i>Amendments sought:</i></p> <p><del>1. The number of vehicle crossings per site must not exceed the following:</del></p>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
				<p>limits the viability of on-site manoeuvring and access.</p> <p>The restriction also inhibits the intent of the PDP to provide for high and medium density development where new allotments created would be much narrower than 50m.</p> <p>Kāinga Ora considers TR-S6 to be sufficient to ensure vehicle crossings are appropriately located to mitigate effects.</p>	<p><del>a. Where the total frontage width does not exceed 50m: One vehicle crossing.</del></p> <p><del>b. Where the total frontage width is between 50m and 100m: Two vehicle crossings.</del></p> <p><del>c. Where the total frontage width exceeds 100m: Three vehicle crossings.</del></p> <p><del>2. Where a site has more than one frontage and is permitted only one vehicle crossing, the location selection of the vehicle crossing must be in accordance with the following order of precedence:</del></p> <p><del>a. Local streets, then</del></p> <p><del>b. Urban connectors or Rural roads, then</del></p> <p><del>c. Any other road.</del></p> <p>3. Vehicle crossings at the point of intersection with any footpath or shared path must have a width not exceeding:</p> <p>a. For single vehicle crossings: 6m, and</p> <p>b. For combined vehicle crossings: 9m.</p> <p>The total width of vehicle crossings must not exceed 30% of the frontage width.</p>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought																
9.	Transport	TR-S10 Loading and unloading – Residential	Oppose in part	This standard is repetitive of Council’s waste management bylaw and does not need to be included within the PDP.	Delete TR-S10 in its entirety.																
10.	Transport	Table 8: High trip generating activity thresholds	Oppose in part	<p>Kāinga Ora considers that the threshold change from 60 dwellings within the ODP to 20 dwellings (for residential units in zones other than the City Centre Zone and Metropolitan Centre Zone) in the PDP is too low a restriction and places additional cost and burden on an applicant to obtain a traffic assessment.</p> <p>Kāinga Ora also consider that thresholds should be tied to number of car parking spaces rather than number of units and that the degree of traffic impact assessment should vary dependent on the degree of exceedance as per submission on TR-R3.2.</p>	<p>Amendments sought:</p> <table><tr><th>Activity</th><th>Threshold</th><th></th><th></th></tr><tr><td></td><td>City Centre Zone Metropolitan Centre Zone</td><td>All other Zones</td><td>Specified High Trip Generator Exemption Overlay</td></tr><tr><td colspan="4">Residential activities</td></tr><tr><td><del>Residential units</del> Number of new carparking spaces</td><td>No threshold</td><td><del>2050</del> or more residential units carparking spaces</td><td>No threshold</td></tr></table>	Activity	Threshold				City Centre Zone Metropolitan Centre Zone	All other Zones	Specified High Trip Generator Exemption Overlay	Residential activities				<del>Residential units</del> Number of new carparking spaces	No threshold	<del>2050</del> or more residential units carparking spaces	No threshold
Activity	Threshold																				
	City Centre Zone Metropolitan Centre Zone	All other Zones	Specified High Trip Generator Exemption Overlay																		
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<del>Residential units</del> Number of new carparking spaces	No threshold	<del>2050</del> or more residential units carparking spaces	No threshold																		
Financial Contributions																					



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11.	Financial contributions	FC-S1 Purpose of financial contributions	Oppose in part	Kāinga Ora queries the requirement for financial contributions for providing and/or upgrading services and infrastructure when Council collect development contributions for the same. Kāinga Ora oppose 'double dipping' of fees paid for infrastructure.	<p><i>Amendments sought as follows:</i></p> <p>A financial contribution may be required for the following purposes:</p> <ol style="list-style-type: none"> <li><del>1. Providing and/or upgrading services and infrastructure.</del></li> <li>2. Providing and/or upgrading reserves.</li> <li>3. Ensuring positive effects on the environment to offset or compensate any adverse effects that cannot otherwise be avoided, remedied or mitigated.</li> </ol>
12.	Financial contributions	FC-S4 Amount of financial contributions – Services and infrastructure, and offsetting and compensation	Oppose	Kāinga Ora queries the requirement for financial contribution for providing and/or upgrading services and infrastructure when Council collect development contributions for the same. Kāinga Ora oppose 'double dipping' of fees paid for infrastructure.	<i>Delete the standard in its entirety.</i>
13.	Financial contribution	FC-Table 1 – Financial Contribution Amount for Services and Infrastructure	Oppose	Kāinga Ora queries the requirement for financial contribution for providing and/or upgrading services and infrastructure when Council collect development contributions for the	<i>Delete the table in its entirety.</i>

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				same. Kāinga Ora oppose 'double dipping' of fees paid for infrastructure.	
<b>Earthworks</b>					
14.	Earthworks	EW-S1 Area of earthworks	Oppose	Kāinga Ora consider that the threshold for earthworks to be too low. Earthworks at this scale can easily be managed through appropriate standards including requirements for sediment and erosion control.	<p><i>Amend EW-S1 as follows:</i></p> <p>Residential Zones</p> <p>The area of earthworks must not exceed <b>250m<sup>2</sup></b> <b>500m<sup>2</sup></b> per site in any 12-month period.</p>
15.	Earthworks	EW-S4 Transport of cut and fill material	Oppose	<p>Kāinga Ora oppose the introduction of a rule restricting the volume of cut/fill material being transported off/onto a site.</p> <p>This matter can be appropriately considered as a matter of discretion when EW-S1 is exceeded and appropriate standard conditions regarding tracking etc can then be included within a resource consent.</p>	<i>Delete this standard in its entirety.</i>
16.	Earthworks	EW-S5 Site Reinstatement	Oppose in part	Kāinga Ora seek that a definition for 'stabilised' be incorporated within the PDP to provide guidance and clarity as to what methods could be used.	<p>Include a definition for 'stabilised' as follows:</p> <p><b><u>means the process of making an area of disturbed soil or site of earthworks resistant to erosion, achieved by paving,</u></b></p>

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					<u>metaling, building over or revegetating. Where seeding or grassing is used on a surface that is not otherwise resistant to erosion, the surface is stabilised once 80% vegetative ground cover has been established over the entire area.</u>
<b>Wind</b>					
17.	Wind	WIND-R1 Demolition, alteration, and additions to existing buildings and structures	Oppose in part	Kainga Ora consider that (b)(i) of this rule is not required. Alterations and additions to building should only be considered if the height threshold is triggered within Table 1 as outlined within (b)(ii).	<p>Relief Sought:</p> <p>2. Activity status: Permitted</p> <p>Where:</p> <ul style="list-style-type: none"> <li>a. Demolition and alterations do not include the removal of existing off-site wind mitigation measures required by a resource consent, and</li> <li>b. Additions or alterations either: <ul style="list-style-type: none"> <li><del>i. Do not increase the height of the building or structure by more than 8m when measured from the existing</del></li> </ul> </li> </ul>

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					<p><del>highest point of the building or structure, or</del></p> <p>ii. Do not result in the building or structure exceeding a height threshold specified in Table 1: Height thresholds for wind assessment when measured from ground level.</p>
18.	Wind	Table 1: Height thresholds for wind assessment	Oppose in part	Kainga Ora consider that the height thresholds for wind assessments is too low and questions the difference in height thresholds between the City Centre Zone/Metro Centre Zone and all other zones. Kāinga Ora considers that this height limit should align with the City Centre/Metro Centre height limit of 22m.	<p><i>Relief Sought:</i></p> <p>Delete existing Table 1: Height thresholds for wind assessment and replace with</p> <p><b>All Zones:</b></p> <p><b><u>22m</u></b></p>
<b>Zones</b>					
19.	Medium Density Residential Zone	MRZ-O1 Purpose of the Medium Density Residential Zone	Support	Kāinga Ora supports this objective as proposed.	<i>Retain MRZ-O1 as notified.</i>
20.	Medium Density Residential Zone	MRZ-O2 Activities in the Medium Density Residential Zone	Support	Kāinga Ora supports this objective as proposed.	<i>Retain MRZ-O2 as notified.</i>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
21.	Medium Density Residential Zone	MRZ-O3 Provision of housing	Support	Kāinga Ora supports this objective as proposed, particularly the reference to three storey buildings.	<i>Retain MRZ-O3 as notified.</i>
22.	Medium Density Residential Zone	MRZ-O4 Planned character and planned urban built environment of the Medium Density Residential Zone	Support in part	Kāinga Ora generally supports this objective as proposed, although considers that the urban environment should achieve the outcomes of the zone and not limited solely to urban design outcomes. A minor amendment is suggested to address this	<p><i>Amend MRZ-O4 as below.</i></p> <p>Built development in the Medium Density Residential Zone will positively contribute to a predominantly residential <a href="#">urban environment</a> that:</p> <ol style="list-style-type: none"> <li>1. Comprises <a href="#">buildings</a> and spaces surrounding <a href="#">buildings, sites</a>, streets, and neighbourhoods that are designed to achieve the desired <del>urban design</del> outcomes for the zone,</li> <li>2. Has an urban built environment that is characterised by a moderate concentration of building densities and forms, including: <ol style="list-style-type: none"> <li>a. Building heights up to three storeys, or</li> <li>b. Building heights up to five storeys in identified areas adjacent to specified centre zones,</li> </ol> </li> </ol>

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					<ul style="list-style-type: none"> <li>3. Is healthy, safe, attractive, and accessible,</li> <li>4. Provides on-site outdoor living area and greenspace for residents, which contributes to visual residential amenity for adjoining properties and the street,</li> <li>5. Includes opportunities for affordable housing, including through the provision of a variety of housing types and sizes,</li> <li>6. Has good access to commercial activities and community services through active and public transport modes, providing for well-connected and low emission communities,</li> <li>7. Is integrated with existing and planned infrastructure, and</li> <li>8. Is connected to open space and the natural environment.</li> </ul>
23.	Medium Density Residential Zone	MRZ-P1 Compatible activities	Support	Kāinga Ora supports this policy as proposed.	<i>Retain MRZ-P1 as notified.</i>

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24.	Medium Density Residential Zone	MRZ-P2 Non-residential activities	Support	Kāinga Ora supports this policy as proposed.	<i>Retain MRZ-P2 as notified.</i>
25.	Medium Density Residential Zone	MRZ-P3 Other activities	Support	Kāinga Ora supports this policy as proposed.	<i>Retain MRZ-P3 as notified.</i>
26.	Medium Density Residential Zone	MRZ-P4 Provision of housing	Support	Kāinga Ora supports this policy as proposed.	<i>Retain MRZ-P4 as notified.</i>
27.	Medium Density Residential Zone	MRZ-P5 Benefits of medium-density housing	Support	Kāinga Ora supports this policy as proposed.	<i>Retain MRZ-P5 as notified.</i>
28.	Medium Density Residential Zone	MRZ-P11 Changing urban environment	Support	Kāinga Ora supports this policy as proposed, in particular, the recognition that medium density development will lead to change within the urban environment which should be expected.	<i>Retain MRZ-P11 as notified.</i>
29.	Medium Density Residential Zone	MRZ-P12 Urban design outcomes by meeting standard or assessment	Support in part	Although Kāinga Ora supports the urban design outcomes proposed, Kāinga Ora considers that this policy reads as matters of discretion rather than a policy and seeks that the policy is deleted and the contents moves to	<i>Delete MRZ-P12 and move the chapeau to matters of discretion included under each relevant rule or standard.</i>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
				assessment criteria under the relevant rule.	
30.	Medium Density Residential Zone	MRZ-P13 Urban design outcomes for non-residential activities and developments of more than 3 residential units	Oppose in part	<p>Kāinga Ora considers that specific urban design outcomes are better included as matters of discretion under each relevant rule or standard.</p> <p>Kāinga Ora also opposes the use of the word 'avoid'. Kāinga Ora considers that 'avoid' should only be included as a failsafe where no other options are considered viable. Kāinga Ora therefore seeks an amendment to this wording of the policy to reflect this.</p>	<p><i>Delete MRZ-P13 and include as assessment criteria as follows:</i></p> <p>Built development for non-residential activities, or for more than 3 residential units per site, is managed to achieve the following outcomes.</p> <p>Where specific existing site constraints (such as topography) or other unusual factors affect the ability for built development to achieve these outcomes, the development shall meet the outcomes to the greatest degree practical.</p> <p>1. <b>The extent to which the proposal creates</b> <del>Create</del> a safe and legible residential environment by:</p> <ol style="list-style-type: none"> <li>providing easily visible, <b>and</b> accessible, <del>and sheltered</del> main entrances to buildings (other than accessory buildings),</li> <li>enabling passive surveillance over public and communal spaces,</li> <li>appropriately designing, demarcating, and lighting public, communal, and private spaces,</li> </ol>



ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<p><del>d. avoiding wasted space or space of unclear function,</del> and</p> <p>e. integrating other CPTED measures at a scale appropriate for the site.</p> <p>2. <del>Avoid</del> <u>Minimises</u> having carparking areas, loading areas, manoeuvring areas, and garages visually or physically dominate public and communal spaces or the streetscape.</p> <p>3. Ensure on-site landscaping, where it is required by a standard or proposed as a mitigation of other effects:</p> <ul style="list-style-type: none"> <li>a. Retains healthy and mature vegetation,</li> <li>b. Uses planting that is appropriate for the climate and environment within the site,</li> <li>c. Improves outlooks from dwellings and softens hard built surfaces, and</li> <li>d. Provides one or more of aesthetic, stormwater management, ecological, or urban heat mitigation benefits.</li> </ul> <p>4. Ensure that activities have storage and servicing areas that:</p> <ul style="list-style-type: none"> <li>a. Are of a functional size,</li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<p>b. Are integrated into the site design to ensure they are conveniently located, accessible, secure, and minimise visual intrusion, and</p> <p>c. Do not create health and safety hazards or nuisance (such as odour) for on-site residents or adjacent sites.</p>
31.	Medium Density Residential Zone	MRZ-P14 Urban design outcomes (exclusions)	Oppose in part	Kāinga Ora considers that this policy reads more as a note than a policy of which proposals can be assessed against.	<i>Delete MRZ-P14 and include the information in the background section.</i>
32.	Medium Density Residential Zone	MRZ-S7 Permeable surface	Oppose	Kāinga Ora opposes the introduction of permeable surfaces within the MRZ and considers that the Landscaped Areas rule (as required by the MDRS) provides adequate control.	<i>Delete MRZ-S7 in its entirety.</i>
33.	High Density Residential Zone	HRZ-O1 Purpose of the High Density Residential Zone	Support	Kāinga Ora supports this objective as proposed.	<i>Retain HRZ-O1 as notified.</i>
34.	High Density Residential Zone	HRZ-O2 Activities in the High Density Residential Zone	Support	Kāinga Ora supports this objective as proposed.	<i>Retain HRZ-O2 as notified.</i>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
35.	High Density Residential Zone	HRZ-O3 Provision of housing	Support	Kāinga Ora supports this objective as proposed.	<i>Retain HRZ-O3 as notified.</i>
36.	High Density Residential Zone	HRZ-O4 Planned character and planned urban built environment of the High Density Residential Zone	Support	Kāinga Ora supports this objective as proposed.	<i>Retain HRZ-O4 as notified.</i>
37.	High Density Residential Zone	HRZ-P1 Compatible activities	Support	Kāinga Ora supports this policy as proposed.	<i>Retain HRZ-P1 as notified.</i>
38.	High Density Residential Zone	HRZ-P2 Non-residential activities	Support	Kāinga Ora supports this policy as proposed.	<i>Retain HRZ-P2 as notified.</i>
39.	High Density Residential Zone	HRZ-P3 Other activities	Support	Kāinga Ora supports this policy as proposed.	<i>Retain HRZ-P3 as notified.</i>
40.	High Density Residential Zone	HRZ-P4 Provision of housing	Support in part	Kāinga Ora seeks that this policy is amended to recognise the greater height and intensity enabled in the High Density Residential Zone.	<i>Amendments sought:</i>  Enable a variety of housing types with a mix of densities within the zone, including three-storey attached and detached dwellings, and <del>low</del> <u>mid</u> -rise apartments.

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
41.	High Density Residential Zone	HRZ-P5 Benefits of sufficient housing capacity and variety	Support	Kāinga Ora supports this policy as proposed.	<i>Retain HRZ-P5 as notified.</i>
42.	High Density Residential Zone	HRZ-P11 Changing urban environment	Support	Kāinga Ora supports this policy as proposed.	<i>Retain HRZ-P11 as notified.</i>
43.	High Density Residential Zone	HRZ-P12 Urban design outcomes by meeting standard or assessment	Support in part	Kāinga Ora considers that specific urban design outcomes are better included as matters of discretion under each relevant rule or standard.	<i>Deletion of HRZ-P12 and include concise and relevant matters of discretion under each rule or standard.</i>
44.	High Density Residential Zone	HRZ-P13 Urban design outcomes for non-residential activities and developments of more than 3 residential units	Oppose in part	<p>Kāinga Ora considers that specific urban design outcomes are better included as matters of discretion under each relevant rule or standard.</p> <p>Kāinga Ora also opposes the use of the word 'avoid'. Kāinga Ora considers that 'avoid' should only be included as a failsafe where no other options are considered viable. Kāinga Ora therefore seeks an amendment to this wording of the policy to reflect this.</p>	<p><i>Delete HRZ-P13 and move contents to assessment criteria as follows:</i></p> <p>Built development for non-residential activities, or for more than 3 residential units per site, is managed to achieve the following outcomes.</p> <p>Where specific existing site constraints (such as topography) or other unusual factors affect the ability for built development to achieve these outcomes, the development shall meet the outcomes to the greatest degree practical.</p>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<p>1. <u>The extent to which the proposal creates</u> Create a safe and legible residential environment by:</p> <ul style="list-style-type: none"> <li>a. Providing easily visible, <u>and</u> accessible, <del>and sheltered</del> main entrances to buildings (other than accessory buildings),</li> <li>b. Enabling passive surveillance over public and communal spaces,</li> <li>c. Appropriately designing, demarcating, and lighting public, communal, and private spaces,</li> <li><del>d. Avoiding wasted space or space of unclear function,</del> and</li> <li>e. Integrating other CPTED measures at a scale appropriate for the site.</li> </ul> <p>2. <del>Avoid</del> <u>Minimises</u> having carparking areas, loading areas, manoeuvring areas, and garages visually or physically dominate public and communal spaces or the streetscape.</p> <p>3. Ensure on-site landscaping, where it is required by a standard or proposed as a mitigation of other effects:</p> <ul style="list-style-type: none"> <li>a. Retains healthy and mature vegetation,</li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<p>b. Uses planting that is appropriate for the climate and environment within the site,</p> <p>c. Improves outlooks from dwellings and softens hard built surfaces, and</p> <p>d. Provides one or more of aesthetic, stormwater management, ecological, or urban heat mitigation benefits.</p> <p>4. Ensure that activities have storage and servicing areas that:</p> <p>a. Are of a functional size,</p> <p>b. Are integrated into the site design to ensure they are conveniently located, accessible, secure, and minimise visual intrusion, and</p> <p>c. Do not create health and safety hazards or nuisance (such as odour) for on-site residents or adjacent sites.</p>
45.	High Density Residential Zone	HRZ-P14 Urban design outcomes (exclusions)	Oppose	Kāinga Ora considers that this policy reads more as a note than a policy of which proposals can be assessed against.	<i>Deletion of HRZ-P14 and include the information in the background section.</i>
46.	High Density Residential Zone	HRZ-S4 Height in relation to boundary	Support in part	Kāinga Ora seeks an amended standard that provides for a more flexible HIRTB in the HRZ, to enable the more	<i>Amendments sought:</i>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
				intensive built form expected in the zone than the MRZ.	<p><del>1. Where up to 3 residential units occupy the site:</del></p> <p><del>a. All buildings and structures must not project beyond a 60° recession plane measured from a point 4 metres vertically above ground level for all side and rear boundaries (as shown in the diagram HRZ-Figure 2).</del></p> <p><del>2. Where 4 or more residential units occupy the site:</del></p> <p><del>a. For the first 21.5m of a side boundary, as measured from the road frontage, buildings and structures must not project beyond a 60° recession plane measured from a point 8 metres vertically above ground level (as shown in the diagram HRZ-Figure 2), and</del></p> <p><del>b. For all other boundaries and the remainder of the side boundary, buildings and structures must not project beyond a 60° recession plane measured from a point 4 metres vertically above ground level (as shown in the diagram HRZ-Figure 2).</del></p> <p><u>1. Where residential units occupy the site:</u></p>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<p><u>a. For the first 22m of a site side boundary as measured from the road frontage, buildings must not project beyond a 60° recession plane measured from a point 19m vertically above the ground level; and</u></p> <p><u>b. For all other boundaries and the remainder of the side boundary, buildings and structures must not project beyond a 60° recession plane measured from a point 8 metres vertically above ground level.</u></p> <p><u>2. Where the boundary forms part of a legal right of way, entrance strip, access site, or pedestrian access way, the height in relation to boundary applies from the farthest boundary of that legal right of way, entrance strip, access site, or pedestrian access way.</u></p> <p>3. Despite 2 above, for any boundary with a site in any other residential zone, a site containing a scheduled historic building or structure or a site in a</p>



ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<p>heritage area, all buildings and structures must not project be beyond a 60° recession plane measured from a point 4 metres vertically above ground level (as shown in the diagram HRZ-Figure 2) for that boundary.</p> <p>4. 1, 2 and 3 do not apply to:</p> <ul style="list-style-type: none"> <li>a. A boundary with a road,</li> <li>b. Existing or proposed internal boundaries within a site,</li> <li>c. Site boundaries where there is an existing common wall between 2 buildings on adjoining sites or where a common wall is proposed,</li> <li>d. Boundaries adjoining a Commercial and Mixed Use Zone or an Industrial Zone,</li> <li>e. Chimney structures not exceeding 1.1m in with on any elevation, provided these do not exceed the height in relation to boundary plane by more than 1m, and</li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					f. Antennas, aerials, satellite dishes (less than 1m in diameter), flues, architectural features (e.g. finials, spires), provided these do not exceed the height in relation to boundary plane by more than 3m measured vertically.
47.	High Density Residential Zone	HRZ-S5 Setbacks	Support in part	Kāinga Ora generally supports the setbacks standard as they relate to side and rear yards. However, Kāinga Ora seeks removal of the front yard setback given a high-density zone has a more urbanised character.	<p><i>Amendments sought:</i></p> <p>1. Buildings and structures shall be setback from the relevant boundary by the minimum depth listed below:</p> <p><del>a. Front yard: 1.5m</del></p> <p>b. Side yard: 1m</p> <p>c. Rear yard: 1m</p> <p>2. One accessory building may be located in a side and/or rear setback provided that the building does not extend more than 6m along the length of any boundary and is not located in a setback that adjoins the rail corridor.</p> <p>3. This standard does not apply to site boundaries where there is an existing common wall between</p>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<p>two buildings on adjoining sites with a common wall existing or proposed.</p> <p>4. This standard does not apply to:</p> <ul style="list-style-type: none"> <li>a. boundary fences or walls of no more than 2m in height above ground level,</li> <li>b. decks less than 500mm in height,</li> <li>c. all structures less than 1.2m in height, and</li> <li>d. any scaffolding or falsework erected temporarily for construction or maintenance purposes.</li> </ul> <p>5. Eaves, chimneys, exterior hot water cylinders, and stormwater detention and retention tanks may encroach into any setback by up to 0.6m.</p>
48.	High Density Residential Zone	HRZ-S7 Permeable surface	Oppose	Kāinga Ora opposes the introduction of permeable surfaces within the HDRZ and considers that the Landscaped Areas rule (as required by the MDRS) provides adequate control.	<i>Delete HRZ-S7.</i>
49.	Mixed Use Zone	MUZ-O1 Purpose of the zone	Oppose in part	Kāinga Ora consider that the wording of this objective reads for the establishment of MUZ and does not	<i>Amendments as follows:</i>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
				define that the MUZ includes residential and commercial uses.	The Mixed Use Zone contributes to a well-functioning urban environment <del>through the provision of areas that can flexibly adapt to a range of mixed urban uses over time, in locations that are appropriate for medium or high density residential and commercial development.</del> <u>by accommodating a mix of residential and non-residential uses that support the social, economic, and cultural wellbeing of people and communities in the surrounding area.</u>
50.	Mixed Use Zone	MUZ-O2 Activities in the zone	Support in part	The objective reads as a policy and should be streamlined for clarity. The points detailed at 1, 3, 4 and 5 should be integrated into MUZ-P1 instead.	<i>Shift the detail from the Objective into Policy-P1.</i>  <i>Retain the following wording in MUZ-O2-2:</i>  The Mixed Use Zone provides flexibility for any combination of commercial, community, light manufacturing and servicing, recreational, residential, and other compatible activities, while reflecting the Mixed Use Zone's role and function in relation to the hierarchy of centres.
51.	Mixed Use Zone	MUZ-O3 Provision of commercial and community spaces and housing	Support	Kāinga Ora supports this objective as proposed.	<i>Retain MUZ-O3 as notified.</i>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
52.	Mixed Use Zone	MUZ-P1 Enabled activities	Support in part	Kāinga Ora supports this policy as proposed, but as stated within submission point on MRZ-O2, the clauses of MRZ-O2 should be shifted to this policy.	<i>Expand policy to include the points MUZ-O2-1, MUZ-O2-3, MUZ-O2-4 and MUZ-O2-5.</i>
53.	Mixed Use Zone	MUZ-P2 Potentially incompatible activities	Oppose in part	Kāinga Ora opposes the use of the word 'avoid' within the policy making some activities non-complying or prohibited.	<p><i>Amend the policy as follows:</i></p> <p>Provide for other, potentially incompatible activities if they:</p> <ul style="list-style-type: none"> <li><i>a.</i> Maintain and enhance the amenity of the mixed use area, as it affects both residential and non-residential uses,</li> <li><i>b.</i> Do not detract from the Mixed Use Zone's ability to meet the zone's planned purpose,</li> <li><i>c.</i> Do not result in land being used in a significantly inefficient way,</li> <li><i>d.</i> Are designed and managed to be consistent with the planned character of the Mixed Use Zone,</li> <li><i>e.</i> Avoid significant adverse effects on residential activities, commercial activities, community activities, and recreation activities enabled in the zone,</li> </ul>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<p>f. Avoid <b>where possible</b> creating <b>significant</b> reverse sensitivity effects,</p> <p>g. Do not undermine the role of commercial centres, and</p> <p>h. Do not form a significant city-wide or regional destination.</p>
54.	Mixed Use Zone	MUZ-P3 Incompatible activities	Oppose in part	Kāinga Ora query the use of the word incompatible and 'likely' incompatible within the policy. Both words are ambiguous and open to interpretation. Further, there is no definition for what constitutes a 'significant' amount of carparking is or a 'large' office.	<p><i>Clarify or provide a definition for 'incompatible', 'significant' and 'large'.</i></p> <p><i>Delete 'likely'.</i></p>
55.	Mixed Use Zone	MUZ-P7 Urban design outcomes (by meeting standard or assessment)	Support in part	Although Kāinga Ora supports the urban design outcomes proposed, Kāinga Ora considers that this policy could be more concise with relevant matters of discretion included under each relevant rule or standard.	<i>Amend MUZ-P7 to be more concise with relevant matters of discretion included under each relevant rule or standard.</i>
56.	Mixed Use Zone	MUZ-P8 Urban design outcomes (larger developments and potentially incompatible activities)	Oppose in part	Kāinga Ora considers that specific urban design outcomes are better included as matters of discretion under each relevant rule or standard.	<p><i>Delete MUZ-P8 and move to assessment criteria with amendments as follows:</i></p> <p>Built development for potentially incompatible activities, or for some enabled activities over an identified threshold of scale, is managed to achieve</p>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
				<p>Kāinga Ora also opposes the use of the word 'avoid'. Kāinga Ora considers that 'avoid' should only be included as a failsafe where no other options are considered viable. Kāinga Ora therefore seeks an amendment to this wording of the policy to reflect this.</p>	<p>the outcomes in this policy through an approach demonstrated in a resource consent.</p> <p>Where specific existing site constraints (such as topography) or other unusual factors affect the ability for built development to achieve these outcomes, the development shall meet the outcomes to the greatest degree practical.</p> <p>The outcomes are:</p> <ol style="list-style-type: none"> <li><b>The extent to which the proposal creates</b> Create a safe and legible urban environment by: <ol style="list-style-type: none"> <li>Providing easily visible, <b>and</b> accessible, <b>and sheltered</b> main entrances to buildings (other than accessory buildings),</li> <li>Enabling passive surveillance over public and communal spaces,</li> <li>Appropriately designing, demarcating, and lighting public, communal, and private spaces,</li> <li><del>Avoiding wasted space or space of unclear function,</del> and</li> <li>Integrating other CPTED measures at a scale appropriate for the site.</li> </ol> </li> <li>Vehicle parking and loading areas, accessways, and garages do not visually or physically dominate public and communal spaces or access to buildings</li> </ol>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<p>and are designed to provide for pedestrian safety, comfort, <del>dignity</del>, and amenity.</p> <p>3. There is quality, legible, safe, and efficient circulation for pedestrians accessing the site and people within the site.</p> <p>4. Ensure on-site landscaping, where it is required by a standard or proposed as a mitigation of other effects:</p> <ul style="list-style-type: none"> <li>a. Retains healthy and mature vegetation,</li> <li>b. Uses planting that is appropriate for the climate and environment within the site,</li> <li>c. Improves outlooks from dwellings and softens hard built surfaces, and</li> <li>d. Provides one or more of functional, aesthetic, stormwater management, ecological, or urban heat mitigation benefits.</li> </ul> <p>5. Public and communal outdoor spaces are designed and landscaped to be comfortable for users in different climatic conditions.</p> <p>6. Larger new non-residential developments display aesthetic value, by responding to existing buildings, providing interesting contrast to existing buildings,</p>



ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<p>or establishing positive new or evolved architectural themes and traditions, and in doing so positively contribute to place and local identity and community pride, particularly on prominent sites such as corners or terminated vistas.</p> <p>7. Ensure adequate privacy for residential activities, and other activities sensitive to privacy intrusion, on the site and on adjacent sites.</p>
57.	Mixed Use Zone	MUZ-P9 Urban design outcomes (exclusions)	Support	Kāinga Ora considers that this policy reads more as a note than a policy of which proposals can be assessed against.	<i>Deletion of MUZ-P9 and include the information in the background section.</i>
58.	Mixed Use Zone	MUZ-R4 Residential Activities	Support	Kāinga Ora supports this rule as proposed.	<i>Retain MUZ-R4 as notified.</i>