



SUBMISSION ON
HUTT CITY COUNCIL - PROPOSED DISTRICT PLAN

To: Chief Executive, Hutt City Council
Via email to: district.plan@huttcity.govt.nz

Submission on: Proposed Lower Hutt District Plan 2025

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- This is a submission by Pandion Ltd concerning the Proposed District Plan as notified by Hutt City Council on 6 February 2025.
- The specific provision of the Proposed District Plan that this submission relates to are the provisions of the Local Centre Zone and the Active Street Frontage Overlay.
- Pandion Ltd could not gain an advantage in trade competition through this submission.
- Pandion Ltd wishes to be heard in support of this submission and will consider presenting a joint case if others make a similar submission.
- Pandion Ltd seeks changes to the Local Centre Zone and Active Street Frontage Overlay provisions.

SITE CONTEXT

This submission relates to the Local Centre Zone in general and the Active Street Frontage Overlay in particular.

Pandion Ltd has a specific interest in these provisions since they apply to the site at 444 Cuba Street which is owned by a related entity (PropCo No2 LP) and Pandion represents the owner as its Project Manager.



Figure 1: 444-446 Cuba Street, Alicetown (Source: GRIP)

The site can be described as follows:

Address	444-446 Cuba Street, Alicetown, Lower Hutt		
Size	1,295m ²		
Title	WN29D/635	WN5B/904	WN5B/904
Parcel ID	3997099	3823873	3984720
Legal description	Lot 1 DP 3983	Part Lot 118 DP 50	Part Lot 62 DP 50
Location	At the corner of Cuba Street and Valentine Street		
Operative DP Zoning	Suburban Mixed Use Activity Area		
Operative DP Overlays	<ul style="list-style-type: none"> ▪ Low Tsunami Hazard Overlay ▪ Medium Coastal Inundation Hazard Overlay ▪ Flood Inundation Overlay ▪ Specific Height Control Overlay – 22m 		
Proposed DP Zoning	Local Centre Zone		

Proposed DP Overlays	<ul style="list-style-type: none"> Active Street Frontage Overlay – Active Frontage B and C Specified High Trip Generator Exemption Overlay Medium Coastal Inundation Hazard Overlay Low, Medium and High Flood Hazard Overlay Liquefaction Hazard Overlay Low Tsunami Hazard Overlay
Current Use and Development	The site is largely covered by a commercial building that is currently used for the retail of furniture. Three carparks and a loading bay are located at the rear of the site with access from Valentine Street.

PLANNING CONTEXT

Operative District Plan

Under the Operative District Plan the site at 444 Cuba Street is zoned as Suburban Mixed Use Activity Area with a 22m height control overlay. The site is also subject to a number of Natural and Coastal Hazard Overlays (Low Tsunami, Medium Coastal Inundation and Flood Inundation). The Suburban Mixed Use provisions anticipate and provide for medium to high density development. The Suburban Mixed Use Activity Area allows for a wide range of commercial and retail activities and also enables residential activities where these are located above ground floor.

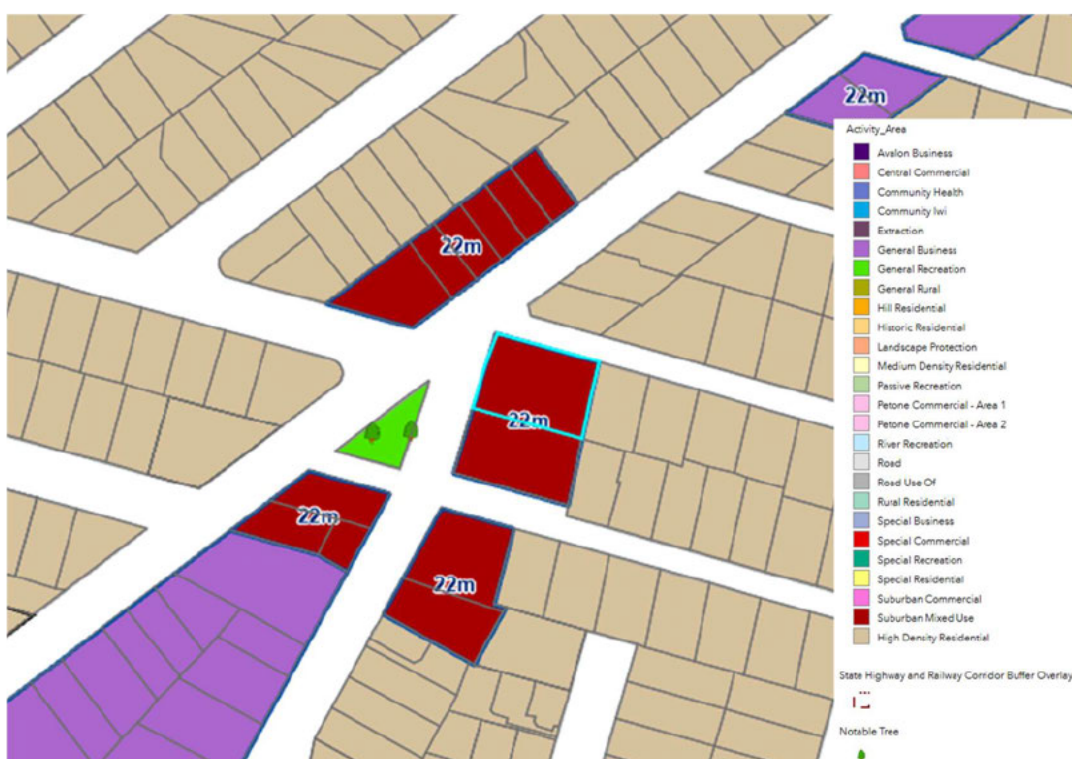


Figure 2: ODP Zones (Source: HCC GIS Viewer)

Proposed District Plan

Under the Proposed District Plan the site at 444 Cuba Street is zoned as Local Centre Zone and is subject to the Active Street Frontage Overlay. Active Frontage B applies along the road boundary with Cuba Street while the entire length of the Valentine Street boundary is subject to Active Frontage C.

The site is also subject to a number of Natural and Coastal Hazard Overlays (Low, Medium and High Flood Hazard, Liquefaction Hazard, Medium Coastal Inundation Hazard, Low Tsunami Hazard) and the Specified High Trip Generator Exemption Overlay - Ava Station.

Local Centre Zone

The Local Centre Zone is intended to apply to medium to large commercial centres and provides for a wide range of activities including larger scale activities than the Neighbourhood Centre Zone and the Mixed Use Zone. Residential activities and development are expected in the form of apartments above ground level. The anticipated urban built development is described as medium or high density commercial buildings and intensive public spaces.

Active Street Frontage Overlay

The Active Street Frontage Overlay intends to protect frontages on identified streets as attractive pedestrian focused environments.

Specified High Trip Generator Exemption Overlay - Ava Station

The Specified High Trip Generator Exemption Overlay is defined as *means the area shown in the planning maps as the Specified High Trip Generator Exemption Overlay*. It applies lower high trip generating activity thresholds to identified areas in close proximity to selected railway stations.

Natural and Coastal Hazard Overlays

The Natural Hazard and Coastal Hazard provisions apply a risk-based approach that balances allowing people and communities to use their property and undertake activities, while also ensuring that lives or significant assets are not harmed or lost as a result of a natural hazard event.



Figure 3: PDP Zones, Active Street Frontage Overlay (Source: HCC GIS Viewer)

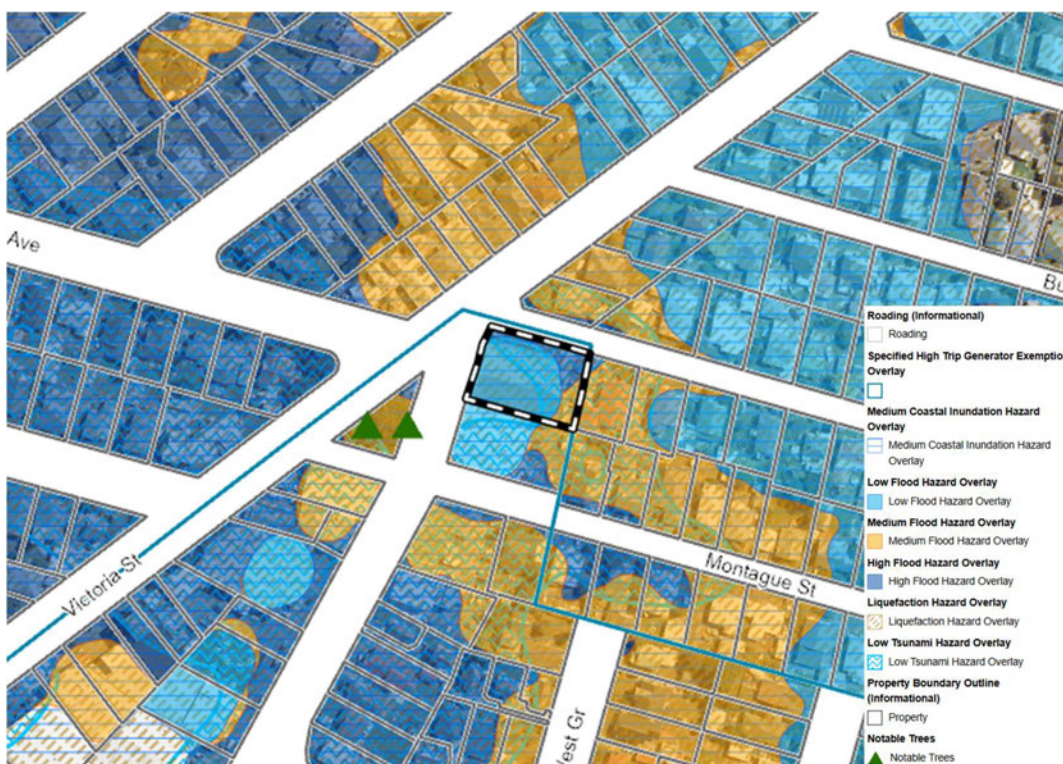


Figure 4: PDP Natural and Coastal Hazard Overlays (Source: HCC GIS Viewer)

SUBMISSION

Submission

This submission seeks changes to the provisions of the Local Centre Zone in general and to the Active Street Frontage Overlay provisions in particular. These changes are outlined in more detail in Appendix 1 to this submission.

In summary the proposed objectives, policies, rules and standards of the Local Centre Zone are considered to be overly complicated and restrictive.

The proposed provisions do not provide a clear and precise framework that encourages and enables development while managing potential adverse effects as required by higher order legislation (NPS-UD, RMA). Rather than providing a clear and easy to follow framework that enables development, provides certainty and guides decision making, the proposed provisions are overly restrictive, detailed and repetitive and thereby create uncertainty and confusion.

The over-regulating rules and standards are backed by policies and matters of discretion that in themselves are confusing and sometimes even irrelevant.

The proposed framework of the Local Centre Zone (including the Active Street Frontage Overlay) has the potential to discourage and deter development, rather than encourage it. The submitter does not consider that there is sufficient evidence to justify the proposed level of regulation.

The intentions of the Specified High Trip Generator Exemption Overlay are acknowledged; however it is noted that the relevant provisions in the Transport chapter are not supported by any policies or explanations.

This submission does not seek to comment on the extent and location or the proposed provisions for the Coastal and Natural Hazard overlays that apply to the site.

DECISION SOUGHT

Pandion Ltd seek the following decision from Council:

- **Amend the proposed provisions of Local Centre Zone to provide a more enabling and effective framework (as outlined in more detail in Appendix 1).**
- **Amend the proposed Active Street Frontage provisions to provide for greater flexibility while still achieving attractive streetscapes (as outlined in more detail in Appendix 1).**
- **Delete the Active Street Frontage C where it applies to the Valentine Street frontage of the site at 444 Cuba Street.**
- **Any consequential changes or alternative relief required to achieve the intended outcomes sought within this submission and to better provide for activities on the submitter's land.**

Yours sincerely,



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16 April 2025

Appendix 1 – Decisions Requested

Local Centre Zone

	PDP Provision	Position	Reasons	Relief Sought
Zoning / Maps				
001	Zoning of the site at 444 Cuba Street as Local Centre Zone	Support	The zoning of the site as Local Centre Zone is considered appropriate in the context of the surrounding area.	Retain
002	Active Street Frontage Overlay	Oppose in part	<p>General</p> <ul style="list-style-type: none"> Street Frontage Overlays are applied to almost every commercial frontage in the LCZ. There appears to be a lack of justification for this approach. It is unclear what the difference between ASF A and ASF B is – except for the difference in activity status for new vehicle crossings (non-complying for ASF B / prohibited for ASF A). Prohibited activity status for new vehicle crossings appears overly restrictive. It is noted that there appear to be only two ASF A in LCZ – Hillary Court in Naenae and Scott Court Walkway in Stokes Valley – both are pedestrian malls. 	<p>Simplify policies, rules and standards in relation to Active Street Frontages and make them less restrictive.</p> <p>Remove or reduce ASF C from boundary of the site with Valentine Street.</p>

	PDP Provision	Position	Reasons	Relief Sought
			<p>Site specific</p> <ul style="list-style-type: none"> ▪ The application of ASF C along the entire frontage of the site with Valentine Street seems unnecessary. ▪ The associated policies, rules and standards are overly complicated and restrictive. 	
General / Introduction				
003	General	Oppose in part	<p>While the overall intention of the Local Centre Zone is supported, the majority of policies, rules and standards are overly restrictive and complicated. The prescribed level regulation is not sufficiently supported by evidence.</p> <p>The proposed provisions create uncertainty and may require excessive levels of economic and other expert assessments.</p>	Amend the provisions to be clearer and more enabling.
004	<i>The planned urban built environment for the Local Centre Zone is medium or high density commercial buildings and intensive public open spaces, while recognising there is a likely need for some space to be dedicated to parking and servicing. Residential development is expected but would be expected to be in the form of apartments above ground level.</i>	Oppose in part	It is unclear what is meant by ' <i>intensive public open space</i> '.	Reword

	PDP Provision	Position	Reasons	Relief Sought
005	<i>Local Centre Zones are frequently subject to the Active Street Frontage Overlay, which intends to protect frontages on identified streets as attractive pedestrian-focussed environments through land use and design controls.</i>	Oppose in part	<p>There appears to be a lack of justification and urban design evidence for the introduction of very prescriptive ASF overlays along almost every frontage in the LCZ.</p> <p>The excessive use of ASF overlays comes at cost of functionality for affected businesses.</p>	Review and amend the application of ASF based on urban design evidence.
Objectives				
006	General	Oppose in part	Overall the proposed objectives are too detailed, they not only describe the desired outcome or end state but also how to achieve it (which should be covered by the policies).	<p>Review and amend.</p> <p>Reduce number and complexity of objectives.</p> <p>Shorten and simplify objectives to describe desired outcomes and end-state.</p>
007	<p><i>LCZ-O4 Planned character and planned urban built environment of the zone</i></p> <p><i>Built development and open spaces positively contribute to a commercial and community hub of activity within a well-functioning urban environment that:</i></p> <p><i>a. Comprises buildings and spaces surrounding buildings, sites, streets, and neighbourhoods that are designed to achieve the desired urban design outcomes for the zone,</i></p> <p><i>b. Has an urban built environment that is characterised by a high concentration of building densities and forms, including buildings that provide an active</i></p>	Oppose in part	<ul style="list-style-type: none"> ▪ Limb d. of the objective assumes that space at ground level is a scarce resource and, in response, prescribes restrictive provisions for its protection. This is not backed by evidence. Especially in the Alicetown LCZ there are several empty shops at ground level. ▪ Limb f. requires the urban environment to be healthy. It is unclear what this trying to 	Review and amend.

	PDP Provision	Position	Reasons	Relief Sought
	<p><i>frontage on identified frontages and providing for building heights up to at least six storeys,</i></p> <p><i>c. Takes advantage of and contributes positively to the opportunities of pedestrian spaces and adjoining parks and reserves,</i></p> <p><i>d. Makes efficient use of the scarce resource of space at ground level,</i></p> <p><i>e. Is easily legible to visitors,</i></p> <p><i>f. Is healthy, safe, attractive, and accessible,</i></p> <p><i>g. Provides useful on-site outdoor living areas for residents, or is located in close proximity to useful public open space in the neighbourhood,</i></p> <p><i>h. Has good access within the Local Centre, to and from surrounding neighbourhoods, and to and from other commercial centres, through active and public transport modes, providing for well-connected and low emission communities,</i></p> <p><i>i. Is integrated with existing and planned infrastructure,</i></p> <p><i>j. Includes opportunities for housing and other activities that positively contribute to the function and amenity of the Local Centre, and</i></p> <p><i>k. Enhances co-location benefits.</i></p>		<p>regulate, what constitutes a healthy urban environment and how this can be assessed and evaluated through a resource consent process?</p> <ul style="list-style-type: none"> ▪ Limb k. requires the enhancement of co-location benefits. It is unclear what this means and how it can be achieved. 	
Policies				
008	General	Oppose in part	The proposed policies are overly prescriptive and convoluted.	Review and simplify the proposed policies.
009	LCZ-P8 Urban design outcomes (by meeting standard or assessment)	Oppose in part	The proposed framework of Urban Design policies are overly detailed	Reduce the number and complexity of Urban Design policies. Replace the

	PDP Provision	Position	Reasons	Relief Sought
	<p><i>Built development is managed to achieve the outcomes in this policy through either meeting the relevant performance standards, or an alternative approach demonstrated in a resource consent when the relevant performance standards are not met.</i></p> <p><i>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.</i></p> <p><i>The outcomes are:</i></p> <ol style="list-style-type: none"> <i>1. Identified street frontages in the Active Street Frontage Overlay are continuous and promote visual connections with the street and public realm.</i> <i>2. Create a safe urban environment by enabling passive surveillance.</i> <i>3. Identified street frontages in the Active Street Frontage Overlay A and B provide a comfortable and sheltered pedestrian environment.</i> <i>4. Buildings encourage community interaction through a positive relationship of commercial activity, community activity, and residential units with the street, public pathways, and other public space.</i> <i>5. Vehicle parking and loading areas, accessways, and garages do not visually or physically dominate public and communal spaces or access to buildings and are designed to provide for pedestrian safety, comfort, dignity, and amenity.</i> 		<p>with lots of overlaps between policies. It is unclear what the different issues are that they are trying to manage. Rather than providing guidance they create confusion. This framework adds unnecessary complexity to the resource consent process.</p> <p>There is no need for three different policies to address urban design:</p> <ul style="list-style-type: none"> ▪ No need to develop different policies based on the size of activity. ▪ No need to introduce an urban design policy for built development that meets relevant standards – if it meets the standards it is permitted and does not require an assessment. If it does not meet the standards it is sufficient to have one policy that outlines the relevant urban design principles and outcomes independently of the size of the activity. ▪ Unsure why built development for larger developments and 	<p>proposed three urban design policies with a simplified policy framework. Shorten policies to provide clear guidance and reduce ambiguity.</p>

	PDP Provision	Position	Reasons	Relief Sought
	<p>6. <i>The form and scale of development contributes to visual amenity in public space.</i></p> <p>7. <i>The form and scale of development protects access to sunlight and daylight in well-used streets and public spaces.</i></p> <p>8. <i>Ensure adequate privacy for residential activities, and other activities sensitive to privacy intrusion, on the site and on adjacent sites.</i></p> <p>9. <i>Ensure adequate access to daylight for residential activities on the site and on adjacent residential zone sites.</i></p> <p>10. <i>Ensure adequate access to sunlight for existing outdoor living spaces on adjacent residential zone sites, and public open space.</i></p> <p>11. <i>Ensure residential units have access to outdoor living spaces that:</i></p> <ol style="list-style-type: none"> <i>Are located and oriented to ensure good access to sunlight,</i> <i>Are of a functional size and configuration,</i> <i>Provide screening or landscaping to contribute to privacy, or</i> <i>Alternatively, public open space is located nearby that is accessible and functional for residents.</i> <p>12. <i>The amenity of surrounding Residential Zones, Rural Zones, and Marae Zones is protected.</i></p> <p>13. <i>Buildings designed for residential use at ground floor are adaptable and flexible to potential future uses such as commercial use.</i></p>		<p>potentially incompatible activities needs to be treated differently and requires a separate policy which covers pretty much the same or very similar issues.</p> <ul style="list-style-type: none"> Generally do not agree with the approach of a 'negative' policy that only identifies what can't be considered. <p>LCZ-P8 – Outcome 5 and LCZ-P9 – Outcome 3:</p> <ul style="list-style-type: none"> The intention of providing for pedestrian safety is accepted but should be achieved through the Transport chapter. The requirement of providing for pedestrian dignity through the design of parking and loading areas, accessways and garages is opposed. It is unclear what would be the appropriate design response to provide for pedestrian "dignity" in the design of parking and accessways. <p>LCZ-P10 – Limb b.</p>	

	PDP Provision	Position	Reasons	Relief Sought
	<p>14. <i>Balance the provision of privacy for residents of ground-floor residential units, where provided for, with the provision of an attractive streetscape.</i></p> <p>Note: <i>The council will publish design guidance with examples of ways these outcomes can be achieved. This guidance does not form part of the District Plan and applicants can also demonstrate how these outcomes have been met in other ways.</i></p>		<ul style="list-style-type: none"> Unclear what is meant by 'where pedestrians cannot stop'. <p>Limb d.</p> <ul style="list-style-type: none"> Providing for sun access to solar panels may not be the main focus of the UD standards and policies but should be able to be considered and even encouraged. <p>Limb e.</p> <ul style="list-style-type: none"> Even if standards are met there may be situations where reduction of height or density may achieve better UD outcomes. <p>Limb f.</p> <ul style="list-style-type: none"> The use of modulation and variation to achieve better urban design outcomes are established techniques and may achieve better outcomes - why can't they be considered? <p>A key factor to achieving a well-functioning urban environment, where greater intensification is enabled, is ensuring that buildings and spaces are designed to a high</p>	
010	<p>LCZ-P9 Urban design outcomes (larger developments and potentially incompatible activities)</p> <p><i>Built development for potentially incompatible activities, or for some enabled activities over an identified threshold of scale, is managed to achieve the outcomes in this policy through an approach demonstrated in a resource consent.</i></p> <p><i>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.</i></p> <p><i>The outcomes are:</i></p> <ol style="list-style-type: none"> <i>Identified street frontages in the Active Street Frontage Overlay are continuous and promote visual connections with the street and public realm.</i> <i>Create a safe and legible urban environment by:</i> 			

	PDP Provision	Position	Reasons	Relief Sought
	<ul style="list-style-type: none"> a. <i>Providing easily visible, accessible, and sheltered main entrances to buildings (other than accessory buildings),</i> b. <i>Enabling passive surveillance over public and communal spaces,</i> c. <i>Appropriately designing, demarcating, and lighting public, communal, and private spaces,</i> d. <i>Avoiding wasted space or space of unclear function, and</i> e. <i>Integrating other CPTED measures at a scale appropriate for the site.</i> <p>3. <i>Vehicle parking and loading areas, accessways, and garages do not visually or physically dominate public and communal spaces or access to buildings and are designed to provide for pedestrian safety, comfort, dignity, and amenity.</i></p> <p>4. <i>There is quality, legible, safe, and efficient circulation for pedestrians accessing the site and people within the site.</i></p> <p>5. <i>Ensure that on-site landscaping, if any is proposed, or required by standard LCZ-S8: Location and design of carparking:</i></p> <ul style="list-style-type: none"> a. <i>Retains healthy and mature vegetation,</i> b. <i>Uses planting that is appropriate for the climate and environment within the site,</i> c. <i>Improves outlooks from dwellings and softens hard built surfaces, and</i> d. <i>Provides one or more of functional, aesthetic, stormwater management, ecological, or urban heat mitigation benefits.</i> 		<p>quality to create positive urban environments, which enhances the environment people then choose to live, work, and socialise within. Urban design principles are relevant considerations for any new buildings over a certain scale.</p>	

	PDP Provision	Position	Reasons	Relief Sought
	<p>6. <i>Public and communal outdoor spaces are designed and landscaped to be comfortable for users in different climatic conditions.</i></p> <p>7. <i>New developments display aesthetic value, by responding to existing buildings, providing interesting contrast to existing buildings, 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.</i></p> <p>8. <i>Large format retail is integrated with its surroundings to contribute to the vibrancy, diversity, and interest of commercial centres.</i></p> <p>9. <i>Ensure adequate privacy for residential activities, and other activities sensitive to privacy intrusion, on the site and on adjacent sites.</i></p> <p><i>Note:</i> <i>The council will publish design guidance with examples of ways these outcomes can be achieved. This guidance does not form part of the District Plan and applicants can also demonstrate how these outcomes have been met in other ways.</i></p>			
011	<p><i>LCZ-P10 Urban design outcomes (exclusions)</i></p> <p><i>For the avoidance of doubt, when applying the standards and urban design policies of this chapter, the following are not controlled, encouraged, anticipated as mitigation, or otherwise provided for by the plan:</i></p> <p><i>a. The protection of scenic views from private property,</i></p>			

	PDP Provision	Position	Reasons	Relief Sought
	<p><i>b. The protection of scenic views from any part of a road where pedestrians cannot stop,</i></p> <p><i>c. The protection of the visibility of commercial signage or advertising,</i></p> <p><i>d. The protection of sunlight access to solar panels, where the height standard is met, even if other standards are not met,</i></p> <p><i>e. Limiting the height, scale, or density of developments where the height, setback, site coverage, height in relation to boundary, and density standards are met, and</i></p> <p><i>f. The use of techniques such as modulation of building form or variation of building materials to reduce the perceived scale of buildings, where the height, setback, and height in relation to boundary standards are met.</i></p>			
Rules – Buildings and Structures				
012	<p>LCZ-R2 Demolition or removal of buildings and structures</p> <p><i>1. Activity status: Permitted</i></p> <p><i>Where:</i></p> <p><i>1. The demolition or removal does not leave the site vacant, and</i></p> <p><i>2. In relation to each of the standards LCZ-S4: Active frontages – Buildings and structures, LCZ-S5: Active frontages – Required verandahs, LCZ-S6: Active frontages – Existing vehicle crossings, LCZ-S7: Active frontages – Land uses, and LCZ-S8: Location and design of carparking:</i></p>	Oppose in part	<p>The proposed rule relating to demolition is overly complicated and it is unclear what effects it is trying to manage – amenity effects or health and safety effects.</p> <ul style="list-style-type: none"> The rule framework appears to be managing an issue that is not a critical RMA issue in the context of Lower Hutt city. Arguably, the rule is regulatory overreach. 	<p>Primary relief sought is to make demolition permitted.</p> <p>Alternative relief sought is to simplify the demolition rule to focus on regulating identified issues.</p> <p>Remove controls that cannot be achieved through the District Plan (e.g. requiring the construction of new building within certain timeframes).</p>

	PDP Provision	Position	Reasons	Relief Sought
	<p>i. Compliance is still achieved, or</p> <p>ii. Where there is an existing non-compliance, it is not increased.</p> <p>2. Activity status: Controlled</p> <p>Where:</p> <p>a. Compliance is not achieved with LCZ-R2.1, but</p> <p>b. The application includes the construction of one or more replacement buildings that comply with standards LCZ-S4: Active frontages – Buildings and structures, LCZ-S5: Active frontages – Required verandahs, LCZ-S6: Active frontages – Existing vehicle crossings, LCZ-S7: Active frontages – Land uses, and LCZ-S8: Location and design of carparking, which would in itself be a permitted activity under LCZ-R3.1</p> <p>Matters of control are limited to:</p> <p>1. Methods to assure the replacement building or buildings are constructed in a timely fashion.</p> <p>2. Methods to protect the safety and amenity values of the site while vacant.</p> <p>Notification:</p> <p>Public notification and limited notification are precluded for applications under this rule.</p> <p>3. Activity status: Restricted discretionary</p> <p>Where:</p> <p>a. Compliance is not achieved with LCZ-R2.1 or LCZ-R2.2, but</p>		<ul style="list-style-type: none"> While the rule is trying to avoid the creation of vacant sites these intentions cannot be achieved. There may be situations where a vacant site seems preferable to a vacant and potentially earthquake prone building – both from an amenity and a health and safety perspective especially in a Local Centre Zone. It is unclear how the demolition of a site can achieve compliance with can ASF standards. The controlled activity status requires the application to include the construction of permitted replacement buildings – however construction of a permitted building is permitted, so why does it need to be included in a controlled activity application? The proposed matters of control and discretion refer to “Methods to assure the replacement building or buildings are constructed in a timely fashion”. This approach is not workable – there are no methods that can enforce construction of a building, 	

	PDP Provision	Position	Reasons	Relief Sought
	<p><i>b The application is in conjunction with an application under LCZ-R3.2 to construct a replacement building or buildings.</i></p> <p><i>Matters of discretion are restricted to:</i></p> <ol style="list-style-type: none"> <i>1. The matters of discretion in the standards not met.</i> <i>2. Methods to assure a replacement building or buildings are constructed in a timely fashion.</i> <i>3. The safety and amenity values of the site while vacant.</i> <p><i>Notification:</i></p> <p><i>Public notification is precluded for applications under this rule.</i></p> <p><i>4. Activity status: Discretionary</i></p> <p><i>Where:</i></p> <p><i>a. Compliance is not achieved with LCZ-R2.1, LCZ-R2.2, and LCZ-R2.3.</i></p>		<p>even if the demolition application is accompanied by a RC application for a new building this does not necessarily result in the actual development of the site.</p>	
013	<p><i>LCZ-R3 Construction of new buildings and structures and alterations and additions to existing buildings and structures</i></p> <p><i>1. Activity status: Permitted</i></p> <p><i>Where:</i></p> <p><i>a. Compliance is achieved with:</i></p> <ol style="list-style-type: none"> <i>i. LCZ-S1: Height,</i> <i>ii. LCZ-S2: Height in relation to boundary – Adjoining zones,</i> <i>iii. LCZ-S3: Setbacks – Adjoining zones,</i> <i>iv. LCZ-S4: Active frontages – Buildings and structures,</i> <i>v. LCZ-S5: Active frontages – Required verandahs,</i> 	Oppose in part	<p>See comments on LCZ-S4 to LCZ-S7 below.</p>	<p>Reduce number and extent of ASF standards and amend rule accordingly.</p>

	PDP Provision	Position	Reasons	Relief Sought
	<p>vi. LCZ-S6: Active frontages – Existing vehicle crossings,</p> <p>vii. LCZ-S7: Active frontages – Land uses,</p> <p>viii. LCZ-S8: Location and design of carparking,</p> <p>ix. LCZ-S9: Outdoor living space, and</p> <p>x. LCZ-S10: Outlook space.</p> <p>2. Activity status: Restricted discretionary</p> <p>Where:</p> <p>a. Compliance is not achieved with LCZ-R3.1.</p> <p>Matters of discretion are restricted to:</p> <p>1. The matters of discretion in any standards not met.</p> <p>Notification:</p> <p>Public notification is precluded for applications under this rule if the only non-compliances are with LCZ-S2: Height in relation to boundary – Adjoining zones, LCZ-S9: Outdoor living space, or LCZ-S10: Outlook space.</p>			
Rules – Land Use Activities				
014	<p>LCZ-R4 Residential activities</p> <p>LCZ-R5 Retirement villages</p> <p>LCZ-R6 Supported residential care facilities</p> <p>LCZ-R7 Health care activities</p> <p>LCZ-R8 Visitor accommodation</p> <p>LCZ-R11 Commercial activities not otherwise provided for</p> <p>LCZ-R12 Activities not otherwise provided for</p> <p>All require compliance with LCZ-S7 Active Frontages – Land Uses</p>	Oppose in part	<p>The requirement to comply with LCZ-S7 is overly restrictive in the LCZ environment. See further comments below.</p> <p>The new planning framework that is looking to manage activities that are sensitive to privacy intrusion on active street frontages etc is regulatory overreach.</p>	<p>Delete LCZ-S7 and all related rule references.</p> <p>For LCZ-R4 Residential activities, LCZ-R5 Retirement villages, LCZ-R6 Supported residential care facilities and LCZ-R8 Visitor accommodation include a requirement for residential units and habitable rooms to comply with newly proposed LCZ-S5 Location of residential units below.</p>

	PDP Provision	Position	Reasons	Relief Sought
015	<p><i>LCZ-R13 Carparking activities</i></p> <p>1. <i>Activity status: Permitted</i> <i>Where:</i></p> <p>1. <i>Compliance is achieved with:</i></p> <ul style="list-style-type: none"> <i>i. LCZ-S6: Active frontages – Existing vehicle crossings,</i> <i>ii. LCZ-S7: Active frontages – Land uses, and</i> <i>iii. LCZ-S8: Location and design of carparking,</i> <p>2. <i>The carparking is not accessed with a vehicle crossing over an Active Street Frontage Overlay B, and</i></p> <p>3. <i>The carparking is not accessed with a vehicle crossing over an Active Street Frontage Overlay A.</i></p> <p>2. <i>Activity status: Restricted discretionary</i> <i>Where:</i></p> <ul style="list-style-type: none"> <i>a. Compliance is not achieved with LCZ-R15.1.a, but</i> <i>b. Compliance is achieved with LCZ-R15.1.b and LCZ-R15.1.c.</i> <p><i>Matters of discretion are restricted to:</i></p> <ul style="list-style-type: none"> <i>1. The matters of discretion any standards not met.</i> <i>2. The vibrancy and attractiveness of the local centre.</i> <i>3. The efficiency of the use of land.</i> <p>3. <i>Activity status: Non-complying</i> <i>Where:</i></p> <ul style="list-style-type: none"> <i>a. Compliance is not achieved with LCZ-R15.1.b.</i> <p>4. <i>Activity status: Prohibited</i> <i>Where:</i></p> <ul style="list-style-type: none"> <i>a. Compliance is not achieved with LCZ-R15.1.c.</i> 	Oppose in part	<p>The proposed non-complying activity status for carparking with vehicle crossings over ASF B is overly restrictive.</p> <p>The prohibited activity status for carparking with vehicle crossing over ASF A assumes that the adverse effects are so significant that there is no way they can be managed – which is unrealistic in a Local Centre Zone environment.</p> <p>A resource consent application cannot be made for a prohibited activity and a consent cannot be granted. The prohibited activity status is the most restrictive of any activity status and therefore must be used with care. The decision to use it should be backed with strong evidence of its necessity, including justification through objectives and policies.</p> <p>Parties wishing to carry out a prohibited activity must apply for a change to the plan to reclassify the activity.</p> <p>The prohibited activity status is not supported by policies –</p>	<p>Amend rule to be more permissive.</p> <p>A discretionary activity status for car parking with vehicle crossing across ASF A and restricted discretionary activity status for ASF B would allow for an assessment of all effects and any application could be declined if the effects cannot be managed appropriately.</p>

	PDP Provision	Position	Reasons	Relief Sought
			<ul style="list-style-type: none"> ▪ LCZ-P4 identifies Vehicle crossings on street frontages subject to the Active Street Frontage Overlay A and B as <i>likely incompatible activities</i> that should be avoided if they are incompatible with the planned purpose, character, and amenity of the Local Centre Zone. ▪ Other <i>likely incompatible activities</i> identified in LPC-P4 include heavy industrial activities and primary production – however these are non-complying activities, not prohibited activities. ▪ No other activity that requires a vehicle crossing over an Active Street Frontage Overlay A is prohibited. <p>Note: LCZ-R15.2., LCZ-R15.3., and LCZ-R15.4. refer to LCZ-R15.1.a, LCZ-R15.1.b and LCZ-R15.1.c, however there are no a, b and c in LCZ-R15.1. It is assumed that LCZ-R15 1, 2 and 3 are meant to be a, b, and c.</p>	

	PDP Provision	Position	Reasons	Relief Sought
Rules – General Rules				
016	<p><i>LCZ-R23 Servicing</i></p> <p>1. <i>Activity status: Permitted</i></p> <p><i>Where:</i></p> <p>a. <i>The servicing is not within 40 metres of a site in a Residential Zone, Mixed Use Zone, or Marae Zone, or</i></p> <p>b. <i>The servicing occurs only between 7:00am and 10:00pm.</i></p> <p>2. <i>Activity status: Restricted discretionary</i></p> <p><i>Where:</i></p> <p>a. <i>Compliance is not achieved with LCZ-R25.1.</i></p> <p><i>Matter of discretion is restricted to:</i></p> <p>1. <i>The nighttime amenity of activities sensitive to noise in the surrounding area in the Mixed Use Zone and in Residential Zones, Marae Zones, and Rural Zones.</i></p> <p><i>Notification:</i></p> <p><i>Public notification is precluded for applications under this rule.</i></p>	Oppose in part	<p>The overly restrictive ASF requirements leave only very limited options for vehicle crossings and site access for servicing – usually away from the main frontages and closer to adjoining residential/mixed use/marae zones. This creates a conflict with the requirement of this rule to keep any servicing at least 40m away from these zones.</p>	<p>Amend to better align with (reduced) ASF requirements – remove or reduce separation distance.</p>
Standards				
017	General	Oppose in part	<p>It is unclear why the matters of discretion in a number of standards refer back to policy <i>LCZ-P8: Urban design outcomes (by meeting standard or assessment)</i> but not to <i>LCZ-P9: Urban design outcomes (larger developments and potentially incompatible activities)</i>. Furthermore, the proposed three urban design</p>	<p>Consequential amendments to matters of discretion.</p>

	PDP Provision	Position	Reasons	Relief Sought
			policies should be replaced with one simplified policy, which would address this issue.	
018	<i>LCZ-S2 Height in relation to boundary - Adjoining zones</i>	Oppose in part	<p>There appear to be no shared boundaries between LCZ and Rural Zones or Marae Zones and therefore there is no need to regulate.</p> <p>The matters of discretion direct plan users to policy LCZ-P8, which relates to developments that comply with permitted standards. The matters of discretion should more accurately just simply reference the key issues that need to be managed (i.e. dominance, privacy, and shading effects on adjoining residential sites), rather than the convoluted approach taken in the notified rules.</p>	<p>Remove reference to Rural Zone and Marae Zone.</p> <p>Simplify and refine the matters of discretion so they are more appropriately targeted to the issue that the standard and rule is managing.</p>
019	<i>LCZ-S3 Setbacks - Adjoining zones</i>			
020	<p><i>LCZ-S4 Active frontages – Buildings and structures</i></p> <p><i>On any site subject to an Active Street Frontage Overlay:</i></p> <p><i>1. There must be a building or abutting group of buildings built to the front boundary, to the full width of the Active Street Frontage Overlay, and to a minimum height of four metres above ground level. Alternatively, the buildings or parts of buildings may be set back from the front boundary by up to 2m where:</i></p>	Oppose	<p>The proposed standards are overly complicated and convoluted. It is unclear what adverse effects they are trying to manage.</p> <p>They create uncertainty regarding consenting requirements and the level of supporting expert advice that is required. This framework will</p>	<p>Replace LCZ-S4 to LCZ-S6 with one combined, succinct, easy to follow and implement standard, e.g.:</p> <p><u>LCZ-S4 - Active Street frontages</u></p> <p><u>1. On any site subject to an Active Street Frontage Overlay A or B all buildings must be built up to and oriented towards the</u></p>

	PDP Provision	Position	Reasons	Relief Sought
	<p>a. <i>The intervening space is paved pedestrian space continuous with the footpath and open to the public, or</i></p> <p>b. <i>The intervening space is a seating or dining area, or</i></p> <p>c. <i>The intervening space is an entrance porch, or</i></p> <p>d. <i>The intervening space is visitor cycle or micromobility parking, or</i></p> <p>e. <i>The intervening space is used for entrance stairs or pedestrian ramps.</i></p> <p>2. <i>The requirement in LCZ-S4.1 does not apply at all on sections of the front boundary:</i></p> <p>a. <i>Where compliance would encroach within the dripline of a notable tree, or</i></p> <p>b. <i>Where necessary to comply with LCZ-S3: Setbacks – Adjoining zones, or</i></p> <p>c. <i>On the Active Street Frontage Overlay C, to the degree necessary to provide for a vehicle crossing, manoeuvring area, and visibility splays (but not parking spaces or loading spaces):</i></p> <p>i. <i>Where no other frontage not in an Active Street Frontage Overlay is available,</i></p> <p>ii. <i>With a traffic lane width of no more than 6m,</i></p> <p><i>and that complies with:</i></p> <p>iii. <i>TR-S5: Vehicle crossings – Number, location and width,</i></p> <p>iv. <i>TR-S6: Vehicle crossings – Separation distances and design,</i></p> <p>v. <i>TR-S7: Driveways,</i></p>		<p>introduce unnecessary complexity to the implementation process.</p> <p>The standards are overly restrictive and do not appropriately enable commercial development. They therefore do not give effect to the NPS-UD.</p> <p>In summary the proposed standards over-regulate and manage non-issues.</p> <p>In particular:</p> <p>LCZ-S4 Active frontages – Buildings and structures</p> <p>1. applies to all ASF and does not differentiate between ASF A, B and C, which is overly restrictive.</p> <p>2.c is overly complicated and convoluted – it is unclear where it applies and what the exemptions are. There is no need to require compliance with TR standards – these need to be complied with anyway.</p> <p>3. does not differentiate between ASF A, B and C.</p> <p>MoD:</p> <p>1. appears to be more relevant for side or rear yard requirements than</p>	<p><u><i>identified building line and provide a verandah that:</i></u></p> <p>a. <u><i>Extends along the entire length of the building frontage;</i></u></p> <p>b. <u><i>Provides continuous shelter with any adjoining veranda; and</i></u></p> <p>c. <u><i>Has a minimum setback of 500mm from any kerb face.</i></u></p> <p><u><i>No verandah shall be required:</i></u></p> <p>d. <u><i>For any scheduled heritage building</i></u></p> <p>e. <u><i>Where the verandah would encroach on the dripline of an existing tree, or</i></u></p> <p>f. <u><i>On any portion of a frontage with an existing vehicle crossing.</i></u></p> <p>2. <u><i>On any site subject to an Active Street Frontage Overlay A or B:</i></u></p> <p>a. <u><i>At least 55% of the ground floor building frontage must be display windows or transparent glazing; and</i></u></p>

	PDP Provision	Position	Reasons	Relief Sought
	<p>vi. TR-S8: Design requirements for motor vehicle parking, circulation, and manoeuvring,</p> <p>vii. TR-S9: Loading and unloading - Non-residential, and</p> <p>viii. TR-S10: Loading and unloading – Residential, and</p> <p>3. The buildings must not have a featureless façade on the front boundary of more than 3m in width at any part of the building between 0.5m and 2.5m in height above footpath level,</p> <p>4. On an Active Street Frontage Overlay A or B frontage, the buildings must provide a minimum of 60% of continuous display windows or transparent glazing along the width of the ground floor at between 0.5m and 2m in height above footpath level,</p> <p>5. On an Active Street Frontage Overlay C frontage, the buildings must provide a minimum of 30% of continuous display windows or transparent glazing along the width of the ground floor at between 0.5m and 2m in height above footpath level,</p> <p>6. The building must have the principal public entrance on:</p> <p>a. An Active Street Frontage Overlay A frontage, if any,</p> <p>b. Otherwise, an Active Street Frontage Overlay B frontage, if any,</p> <p>c. Otherwise, an Active Street Frontage Overlay C frontage.</p>		<p>Active Street Frontages since it does not contribute to creating attractive pedestrian-focussed environments.</p> <p>4. is unnecessary since existing activities have existing use rights and it is unclear how this can be assessed as part of a resource consent application.</p> <p>LCZ-S5 Active frontages – Required verandahs</p> <p>Requiring the construction of verandahs for any alteration is overly demanding and onerous.</p> <p>MoD</p> <p>4. is unnecessary since existing activities have existing use rights and it is unclear how this can be assessed as part of a resource consent application.</p> <p>LCZ-S6 Active frontages – Existing vehicle crossings</p> <p>It is unclear what issues/effects this standard is trying to manage and why it is focused on existing vehicle crossings. The provisions for new vehicle crossings in the transport</p>	<p><u>b. The principal public entrance to the building must be orientated to the front boundary.</u></p> <p>3. <u>On any site subject to an Active Street Frontage Overlay C:</u></p> <p><u>a. At least 35% of the ground floor building frontage for non-residential activities must display windows or transparent glazing.</u></p> <p><u>Matters of discretion if the standard is breached:</u></p> <p>1. <u>The relevant matters in policy LCZ-PX (Urban Design Outcomes)</u></p> <p>2. <u>Any topographical or other site constraints that make compliance with the standard impractical</u></p> <p>3. <u>Any on-site functional needs or operational needs that make compliance with the standard impractical.</u></p> <p>4. <u>Whether the building promotes a positive interface with the street, creates visual interest or</u></p>

	PDP Provision	Position	Reasons	Relief Sought
	<p>7. <i>Roller shutter doors, security grilles, screens or similar structures fitted to the facade of any building on the front boundary must be at least 50% visually transparent.</i></p> <p><i>Matters of discretion if the standard is breached:</i></p> <ol style="list-style-type: none"> 1. <i>Access for repairs and maintenance to buildings and structures on the site.</i> 2. <i>Urban design outcomes 1, 2, 3, 4, 5, and 6 in LCZ-P8: Urban design outcomes (by meeting standard or assessment).</i> 3. <i>The matters in LCZ-P10: Urban design exclusions.</i> 4. <i>Where the non-compliance relates to an existing activity, the ability of that activity to continue functioning if it were to comply, and the scale of the non-compliance in relation to the effects of that activity no longer occurring at the site.</i> 5. <i>Any positive effects that can only be achieved through non-compliance with the standard.</i> 		<p>chapter are considered to be sufficient.</p> <p>It is unclear why new buildings or increased GFA on a site create an issue for existing vehicle crossings.</p> <p>The main focus of ASF should be on streetscape amenity and continuous frontages. Pedestrian safety should be addressed in the transport chapter.</p> <p>MoD</p> <p>The proposed matters of discretion are focused on safety and efficiency of the transport network. It is unclear how a resource consent application for demolition, construction or alteration of a building can address or manage the effects on potential future road events or road closures.</p>	<p><u>otherwise enhances the streetscape.</u></p> <p>Replace LCZ-S7 with more succinct standard that is easy to follow and implement, e.g.:</p> <p><u>LCZ-S5 Location of residential units</u></p> <p><u>On any site subject to an Active Street Frontage Overlay</u></p> <ol style="list-style-type: none"> 1. <u>Any residential units and habitable rooms must be located above ground floor.</u> <p><u>Matters of discretion are restricted to:</u></p> <ol style="list-style-type: none"> 1. <u>The amenity and quality of the streetscape; and</u> 2. <u>The promotion of community safety and visual interest at the pedestrian level;</u> 3. <u>The ability for future conversion of the residential unit to commercial use.</u>
021	<p>LCZ-S5 Active frontages – Required verandahs</p> <p><i>Where any building is constructed, added to, or altered on a site with a frontage in the Active Street Frontage Overlay A or B, it must provide a verandah or canopy in legal road along the length of the Active Street Frontage Overlay that:</i></p> <ol style="list-style-type: none"> 1. <i>Extends for the full width of the site frontage covered by the Active Street Frontage Overlay,</i> 2. <i>Extends outwards from the front of the building to the front boundary and then into the road for at</i> 		<p>LCZ-S7 Active frontages – Land uses</p> <p>Most frontages within the LCZ are identified as ASF A,B or C, all frontages of 444 Cuba Street are affected by ASF B and C.</p>	

	PDP Provision	Position	Reasons	Relief Sought
	<p><i>least 3 metres, or to the far side of the kerbing less 500mm, whichever is the lesser,</i></p> <p>3. <i>Provides continuous shelter with any adjoining verandah or pedestrian shelter.</i></p> <p><i>But no verandah or canopy shall be required:</i></p> <p>4. <i>From any site containing a listed heritage item, except where there was a verandah or canopy on 6 February 2025,</i></p> <p>5. <i>On any portion of a frontage where the required verandah or canopy, as seen in plan, would encroach on the dripline of a notable tree or street tree, or</i></p> <p>6. <i>On any portion of a frontage with an existing vehicle crossing.</i></p> <p><i>Matters of discretion if the standard is breached:</i></p> <p>1. <i>Safety and efficiency of the transport network.</i></p> <p>2. <i>Urban design outcomes 1, 3, 4, and 5 in LCZ-P8: Urban design outcomes (by meeting standard or assessment).</i></p> <p>3. <i>The matters in LCZ-P10: Urban design exclusions.</i></p> <p>4. <i>Where the non-compliance relates to an existing activity, the ability of that activity to continue functioning if it were to comply, and the scale of the non-compliance in relation to the effects of that activity no longer occurring at the site.</i></p> <p>5. <i>Any positive effects that can only be achieved through non-compliance with the standard.</i></p>		<p>This standard is overly restrictive and prevents a large number of activities from establishing in the LCZ.</p> <p>It appears to be based on the assumption that there is a shortage of ground floor commercial space – which is contradicted by lots of empty shops.</p> <p>It is unclear why activities like health care services should be prevented from locating on the ground floor – the required privacy can and will be achieved through locating treatment areas to the back.</p> <p>The proposed definition for <i>Activities Sensitive To Privacy Intrusion</i> lists certain activities but excludes related access, lobbies, reception areas and public toilets and thereby creates confusion rather than providing certainty. The proposed rule framework is regulatory overreach.</p> <p>It is sufficient to limit residential units (including for visitor accommodation and retirement villages) to being located above ground floor rather than preventing a wide range of</p>	
022	<p>LCZ-S6 Active frontages – Existing vehicle crossings</p> <p><i>Where there are any existing vehicle crossings across an Active Street Frontage Overlay A or B that serve the site:</i></p>			

	PDP Provision	Position	Reasons	Relief Sought
	<p>1. <i>That vehicle crossing may not be used to serve any additional parking or loading spaces,</i></p> <p>2. <i>There may not be any new building on the site,</i></p> <p>3. <i>There may not be any addition to any building that increases the gross floor area, and</i></p> <p>4. <i>Other existing vehicle crossings that are not on the Active Street Frontage Overlay A or B may not be removed,</i></p> <p><i>unless all vehicle crossings across the Active Street Frontage Overlay A and B on the site are removed.</i></p> <p><i>Matters of discretion if the standard is breached:</i></p> <p>1. <i>Pedestrian amenity, comfort, and safety.</i></p> <p>2. <i>Safety and efficiency of the transport network.</i></p> <p>3. <i>The impact of the activity or change in the activity on the feasibility and likelihood of the future removal of the relevant vehicle crossings.</i></p> <p>4. <i>Effects on the current or potential future use of the road for events.</i></p> <p>5. <i>Effects on the current or potential future ability of the road to be closed to general motor vehicle traffic.</i></p> <p>6. <i>Visual amenity.</i></p> <p>7. <i>Urban design outcomes 1, 3, 4, 5, 6, and 12 in LCZ-P8: Urban design outcomes (by meeting standard or assessment).</i></p> <p>8. <i>The urban design outcomes in LCZ-P9: Urban design outcomes (larger developments and potentially incompatible activities).</i></p> <p>9. <i>The matters in LCZ-P10: Urban design exclusions.</i></p>		<p>activities from locating on the ground floor.</p> <p>MoD</p> <p>The proposed matters of discretion are too wide (e.g. reverse sensitivity on potential future temporary activities in road reserve) and create the potential need for multiple expert assessments to respond to and manage unrelated issues.</p> <p>5. is unnecessary since existing activities have existing use rights and it is unclear how this can be assessed as part of a resource consent application.</p> <p>6. is overly onerous and can result in the requirement of a development capacity and demand assessment for the establishment of a single activity in a LCZ.</p> <p>8. it is unclear why LCZ-P9: <i>Urban design outcomes (larger developments and potentially incompatible activities)</i> is referenced in this standard but not in other standards.</p>	

	PDP Provision	Position	Reasons	Relief Sought
	10. Any positive effects that can only be achieved through non-compliance with the standard.			
023	<p>LCZ-S7 Active frontages – Land uses</p> <p>On any site subject to an Active Street Frontage Overlay:</p> <ol style="list-style-type: none"> 1. No activity sensitive to privacy intrusion or light manufacturing and servicing activity may be located at ground level within 10m of an active frontage boundary. <p>On any site within the Riverbank Precinct:</p> <ol style="list-style-type: none"> 1. No activity sensitive to privacy intrusion or light manufacturing and servicing activity may be located on site unless the finished floor level of the activity is at least 4m above the top of the stopbank. <p>Matters of discretion if the standard is breached:</p> <ol style="list-style-type: none"> 1. Pedestrian amenity, comfort, and safety. 2. Reverse sensitivity effects on other activities in the zone. 3. Effects, including reverse sensitivity effects, on the current or potential future use of the road for temporary activities. 4. Effects, including reverse sensitivity effects, on the current or potential future use of the road for public transport or active transport infrastructure. 5. Where the non-compliance relates to an existing activity, the ability of that activity to continue functioning if it were to comply with the standard, and the scale of the non-compliance in relation to the effects of that activity no longer occurring at the site. 			

	PDP Provision	Position	Reasons	Relief Sought
	<p>6. <i>The short-term, medium-term, and long-term development capacity and demand needs for commercial and residential activities in the commercial centre.</i></p> <p>7. <i>Urban design outcomes 1, 2, 3, 4, 9, 10, 13, and 14 in LCZ-P8: Urban design outcomes (by meeting standard or assessment).</i></p> <p>8. <i>The urban design outcomes in LCZ-P9: Urban design outcomes (larger developments and potentially incompatible activities).</i></p> <p>9. <i>The matters in LCZ-P10: Urban design exclusions.</i></p> <p>10. <i>Any positive effects that can only be achieved through non-compliance with the standard.</i></p>			
024	<p>LCZ-S8 Location and design of carparking</p> <p><i>On any site subject to an Active Street Frontage Overlay A or B:</i></p> <ol style="list-style-type: none"> 1. <i>Carparking must only be located:</i> <ol style="list-style-type: none"> a. <i>Within or underneath a building, or</i> b. <i>On top of a building at least 3 metres above ground level, or</i> c. <i>Shielded from the Active Street Frontage Overlay A or B by a building.</i> 2. <i>Carparking may not be served by a vehicle crossing across an Active Street Frontage Overlay A or B.</i> <p><i>On any site subject to an Active Street Frontage Overlay C:</i></p> <ol style="list-style-type: none"> 3. <i>Carparking must only be located within or underneath a building, on top of a building at least 3m above ground level, beside a building accounting</i> 	Oppose in part	The proposed standard is overly complicated, creating uncertainty and providing unnecessary regulation.	Amend and simplify

	PDP Provision	Position	Reasons	Relief Sought
	<p><i>for no more than 50% of the width of the site, or behind a building.</i></p> <p><i>On any site:</i></p> <ol style="list-style-type: none"> <i>4. Parking areas must be screened from any adjoining site in a Residential Zone, Rural Zone, or Marae Zone with a building or a close-boarded fence of at least 1.8m in height above ground level.</i> <i>5. Parking areas must be designed so they can only be accessed from a formed vehicle crossing.</i> <i>6. Parking areas must be sealed to prevent dust (this may be permeable).</i> <i>7. Parking areas other than manoeuvring space must be separated from any boundary by landscaped buffer of at least 0.5m (with a kerb or wheel stop) or 1.5m (otherwise), or a building or fence.</i> <i>8. There must be at least 1m² of landscaping for every 20m² of outdoor carparking or vehicle manoeuvring area. The landscaping referred to in LCZ-S8.7 may be included.</i> <p><i>Matters of discretion if the standard is breached:</i></p> <ol style="list-style-type: none"> <i>1. Pedestrian amenity, comfort, and safety.</i> <i>2. Visual amenity.</i> <i>3. Urban design outcomes 1, 2, 3, 4, 5, 6, and 8 in LCZ-P8: Urban design outcomes (by meeting standard or assessment).</i> <i>4. The matters in LCZ-P10: Urban design exclusions.</i> <i>5. Any positive effects that can only be achieved through non-compliance with the standard.</i> 			