
ENVIRO NZ SERVICES LTD SUBMISSION ON THE PROPOSED LOWER HUTT DISTRICT PLAN

Submitter Details:

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4. Date of Submission: 30 April 2025

Introduction:

5. Enviro NZ Services Limited (Enviro NZ) is the second-largest solid and liquid waste management company in New Zealand.
6. Enviro NZ owns and operates significant portions of the Country's waste management infrastructure including landfills, waste treatment facilities, recycling facilities and waste transfer facilities. Enviro NZ also provides waste and recycling collection services for Councils, businesses and households throughout New Zealand.
7. As a materials management and resource recovery company, Enviro NZ is committed to managing, recovering and processing waste streams to deliver sustainable outcomes. In the delivery of these outcomes, District Plans are important documents that need to allow for essential waste infrastructure in a city or district. They must ensure that appropriate and resilient infrastructure is provided for as the vulnerability of society to infrastructure short-comings can be severely detrimental to the economic, health and social well-being.
8. Enviro NZ operates waste, waste diversion, and recycling collection services within Hutt City. It operates these services from a site in Gracefield.

9. Enviro NZ could not gain an advantage in trade competition through this submission.
10. Enviro NZ is directly affected by an effect of the subject matter of that submission that–
 - (a) adversely affects the environment; and
 - (b) does not relate to trade competition or the effects of trade competition:
11. Enviro NZ wishes to be heard in support of your submission at the hearing.
12. If others make a similar submission, Enviro NZ will consider presenting a joint case with them at the hearing.

Scope of Submission

13. Enviro NZ makes this submission on the following parts of the Draft District Plan:
 - Definitions
 - Strategic Direction Objectives
 - Hazardous Substances
 - General Rural Zone
 - Light Industrial Zone
 - General Industrial Zone
 - Heavy Industrial Zone
 - General Residential Zone Precincts
14. Specific comments have been detailed in the table at **Appendix 1**.

General Comments on the Draft District Plan

15. The Plan needs to accommodate sites for existing or planned waste management facilities. These sites often need to manage reverse sensitivity effects arising from the potential discharge of odour, dust and noise from the facilities. There are also high numbers of vehicle movements with respect to any waste facility. Therefore, waste facilities are ideally located distant to residential properties and other sensitive receivers.
16. Waste facilities can also take significant resources to design, consent and construct facilities that minimise effects on the natural environment and nearby residents. To achieve continuing waste diversion, existing sites are likely to need upgrading to sort and handle different waste streams, or be expanded to handle increases in volumes. The equipment required to establish or upgrade a modern facility, that meets current environmental standards, is very capital intensive. Accordingly, it is important that waste facilities are recognised and provided for within the area, and also that their ongoing operation is protected from reverse sensitivity.

17. The Plan needs to take account of the Wellington Region Waste Management and Minimisation Plan ("WRWMMP"). The actions of the Plan can only be achieved if waste resource recovery and infrastructure is provided for through District Plan provisions. One of these actions is ensure organic processing systems are available to the Wellington region by 2029. However, the draft Plan includes organic processing under composting which is defined as a heavy industry activity. As such, a suitable consenting pathway for a composting facility is uncertain. Accordingly, some amendments are proposed to the Plan to accommodate this activity.

Infrastructure Definition

18. The draft Plan takes the infrastructure definition from the RMA. It is requested that the Infrastructure definition is amended to include district or regional resource recovery or waste disposal facilities. These facilities are of regional significance as they serve the district and beyond.
19. Adding to this definition acknowledges that waste management and disposal facilities are an essential part of the services needed for a society to function. Adding to the definition would then be in accordance with the NZ Waste Strategy, the Infrastructure Strategy and Aotearoa New Zealand's First Emissions Reduction Plan (where management of waste is required for the reduction of greenhouse gases). It also acknowledges that there needs to be new waste infrastructure to divert resources from landfill, as detailed in the Wellington Region Waste Management and Minimisation Plan.
20. If waste infrastructure is not added to the definition, they are excluded from consideration regarding infrastructure elsewhere in the Draft Plan. Amending the definition will also remove the need to amend clauses in the Draft Plan to include the waste facilities as listed within Appendix 1. We do not see a conflict arising in the Infrastructure chapter by the inclusion of waste management and disposal facilities under the Infrastructure definition, when an exclusion is added in addition to those already which states that the rules do not apply, only the objectives and policies.

Signed for and on behalf of Enviro NZ Services Limited:



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Section of Proposed Plan	Support/ Oppose	Specific Text Identified	Relief Sought	Reasons
Part 1- Introduction and General Provisions				
How the Plan Works				
Other documents	Amend		Add the Wellington Region Waste Management and Minimisation Plan as an 'other document' with respect to section 74(2)(b)(i) of the Resource Management Act	District Plans must be prepared having regard to management plans and strategies prepared under other Acts (s74(2)(b)(i) of the RMA). The Wellington Region Waste Management & Minimisation Plan (WRWMMP) is one of the documents that should inform the strategic context of the Combined District Plan. Waste management and minimisation is a critical issue in the Wairarapa region and has significant impacts on meeting climate change goals. The actions of the WRWMMP need to inform District Plan provisions.
Interpretation - Definitions				
Activity sensitive to industry	Amend	<i>Means a:</i> 1. Residential activity... 1. Place of assembly	<i>Means a:</i> 1. Residential activity... 21. Place of assembly 22. <u>Early childhood education activity</u>	Early childhood activities should be added to the definition given the risk that some industrial products have to small children.
Activities sensitive to hazardous substance risks	Support	<i>means a:</i> 1. residential activity, or 2. retirement village, or 3. supported residential care facility, or 4. marae, or 5. healthcare activity, or 6. educational facility, or 7. community facility, or 8. office activity, other than ancillary to an activity that is not an activity sensitive to hazardous substance risks, or 9. community corrections activity, or 10. custodial corrections facility, or 11. visitor accommodation activity, or 12. place of assembly.		The definition strikes the right balance of activities as being sensitive.
ancillary transport network infrastructure	Support with amendments	<i>means infrastructure located within the road reserve that supports the transport network and includes:</i> ...	<i>means infrastructure located within the road reserve that supports the transport network and includes:</i> ... j. space for Council kerbside waste bins.	Refuse trucks need to have the appropriate space within road reserves that supports the collection of the Council residential rubbish and recycling bins. With intensification, road reserves need to be carefully planned to allow for refuse truck access to bins. While the placement of bins is temporary, the provision of space for their collection is paramount to allow efficient collection of bins and avoid injury to users of the road while refuse trucks are operating. Adding this clause to the definition will ensure that this element of the road reserve is considered.
Cleanfill area	New definition		<i>Means an area used exclusively for the disposal of cleanfill material</i>	This definition should be added to the district plan to recognise that cleanfills and landfills are important uses in the rural area. The definition has the same meaning as that in the National Planning Standards. The definition will also allow for these activities to be defined differently from industrial activities.
cleanfill material	Support	<i>means virgin excavated natural materials including clay, gravel, sand, soil and rock that are free of:</i> a. combustible, putrescible, degradable or leachable components; b. hazardous substances and materials; c. products and materials derived from hazardous waste treatment, stabilisation or disposal practices; d. medical and veterinary wastes, asbestos, and radioactive substances; e. contaminated soil and other contaminated materials; and		This definition recognises that cleanfill material is an important resource while defining the parameters so that the material is free of contaminants.

		<i>f. liquid wastes.</i>		
Co-location benefits	Support with amendments	<p><i>means economic, social, cultural, and other benefits that arise from activities being located close to similar activities, compatible activities, related activities, or services useful to the employees, residents, students, and visitors already in a place. Co-location benefits can include, but are not limited to, benefits from:</i></p> <ol style="list-style-type: none"> <i>1. Access to a wider range of goods and services for those employees, residents, students, and visitors already in a place,</i> <i>2. Easier comparison shopping,</i> <i>3. Easier trip-chaining,</i> <i>4. Economies of density,....</i> 	<p><i>means economic, social, cultural, and other benefits that arise from activities being located close to similar activities, compatible activities, related activities, or services useful to the employees, residents, students, and visitors already in a place. Co-location benefits can include, but are not limited to, benefits from:</i></p> <ol style="list-style-type: none"> <i>1. Access to a wider range of goods and services for those employees, residents, students, and visitors already in a place,</i> <i>2. Easier comparison shopping,</i> <i>3. Easier trip-chaining length and coordination,</i> <i>4. Economies of density,....</i> 	The word trip-chaining appears to be jargon that may confuse readers and should be re-worded for ease of use.
Green infrastructure	Support	<p><i>means a natural or semi-natural area, feature or process, including engineered systems that mimic natural processes, which are planned or managed to:</i></p> <ol style="list-style-type: none"> <i>a. provide for aspects of ecosystem health or resilience, such as maintaining or improving the quality of water, air or soil, and habitats to promote biodiversity, and</i> <i>b. provide services to people and communities, such as stormwater or flood management or climate change adaptation.</i> 		This definition is supported.
Heavy industrial activity	neutral	<p><i>means:</i></p> <ul style="list-style-type: none"> <i>• an offensive trade,</i> <i>• a significant hazardous facility,</i> <i>• an abattoir,</i> <i>• a refinery,</i> <i>• the storage, treatment, or disposal of waste materials, including any waste transfer station or resource recovery park, and</i> <i>• the composting of organic materials, excluding composting undertaken on the site from which the material is sourced, of up to 10m³ in volume.</i> <p><i>or any other industrial activity that creates offensive and objectionable noise, dust, or odour, or elevated risks to people's health and safety.</i></p>	<p><i>means:</i></p> <ul style="list-style-type: none"> <i>• an offensive trade,</i> <i>• a significant hazardous facility,</i> <i>• an abattoir,</i> <i>• a refinery,</i> <i>• the storage, treatment, or disposal of waste materials, including any waste transfer station or resource recovery park, and</i> <i>• the composting of organic materials or organic waste, excluding composting undertaken on the site from which the material is sourced, of up to 10m³ in volume.</i> <p><i>or any other industrial activity that creates offensive and objectionable noise, dust, or odour, or elevated risks to people's health and safety.</i></p>	The submitter accepts the clause including the storage, treatment or disposal of waste materials, etc, noting that refuse collection and disposal is also an offensive trade. Clarification is required to capture organic waste processing in accordance with the WMMP.
Infrastructure	Oppose in part	<p><i>has the same meaning as in section 2 of the RMA (as set out below)</i></p> <p><i>a) pipelines that distribute or transmit natural or manufactured gas, petroleum, biofuel, or geothermal energy:</i></p> <p><i>....</i></p> <p><i>l) anything described as a network utility operation in regulations made for the purposes of the definition of network utility operator in section 166.</i></p>	<p><i>has the same meaning as in section 2 of the RMA (as set out below)</i></p> <p><i>a) pipelines that distribute or transmit natural or manufactured gas, petroleum, biofuel, or geothermal energy:</i></p> <p><i>....</i></p> <p><i>l) anything described as a network utility operation in regulations made for the purposes of the definition of network utility operator in section 166.</i></p> <p><i>m) district or regional resource recovery or</i></p>	The definition for infrastructure under the RMA excludes waste processing and disposal facilities, however the repealed Natural and Built Environment Act included 'district or regional resource recovery or waste disposal facilities'. It is essential to include district and regional waste facilities as part of the infrastructure definition to acknowledge that waste management and disposal facilities are an essential part of the services needed for a society to function. It will also align with the definition of Regionally Significant Infrastructure under the Regional Policy Statement for the Wellington Region and the operative Natural Resources Plan for the Wellington Region. Amending the definition will also ensure that the appropriate objectives and policies come into play in the Strategic Directions chapter. Without inclusion in the definition, none of the objectives and policies will operationally apply to any regional landfills or district refuse transfer stations or recycling facilities. The additional text for the definition will help to ensure that activities which may

			<u>waste disposal facilities.</u>	result in reverse sensitivity effects do not establish in close proximity to these sites, given that these sites are difficult to consent, and capital intensive to ensure strict environmental compliance.
Landfill	New definition		<i>Means an area used for, or previously used for, the disposal of solid waste. It excludes cleanfill areas.</i>	This definition should be added to the district plan to recognise that landfills are an important use in the city, particularly in consideration that the Silverstream landfill and the closed Wainuiomata landfill are within the city boundaries. The definition has the same meaning as that in the National Planning Standards. The definition will also allow for these activities to be defined differently from industrial activities.
Light Manufacturing and servicing	Support with amendments	<i>means an <u>industrial activity</u> where articles, goods or produce are made, prepared and/or repaired for sale or rent and the <u>light manufacturing and servicing</u> activity is contained entirely within a <u>building</u>, does not require the use, storage or handling of <u>hazardous substances</u> requiring separate resource consent and does not require any regional air, <u>water</u>, or <u>land discharge</u> consent.</i> <i>Excludes any <u>heavy industrial activity</u>, <u>service station</u>, <u>motor vehicle servicing</u> or any activity which has <u>servicing</u> by <u>heavy motor vehicles</u>.</i>	<i>means an <u>industrial activity</u> where articles, goods or produce are made, prepared and/or repaired/<u>repurposed</u> for sale or rent and the <u>light manufacturing and servicing</u> activity is contained entirely within a <u>building</u>, does not require the use, storage or handling of <u>hazardous substances</u> requiring separate resource consent and does not require any regional air, <u>water</u>, or <u>land discharge</u> consent.</i> <i>Excludes any <u>heavy industrial activity</u>, <u>service station</u>, <u>motor vehicle servicing</u> or any activity which has <u>servicing</u> by <u>heavy motor vehicles</u>.</i>	Some recycling activities involve the re-use of the items recycled and due to the nature of materials handled can be undertaken in a building and not require additional consents. The proposed amendment will ensure diversion from landfill is enabled.
Operational need	neutral	<i>means the need for a proposal or activity to traverse, locate or operate in a particular <u>environment</u> because of technical, logistical or operational characteristics or constraints.</i>		Accept the proposed definition, as taken from the national planning standards
Organic waste	New definition		<u>Organic waste is biodegradable matter, such as food scraps, garden cuttings, grass, and branches, that can be accepted at an organics processing facility or facilities. In the context of this WMMP, biosolids is excluded from this definition</u>	There needs to be a definition for organic waste in order to provide for processing household food waste on a city-wide scale. The definition is taken from the WRWMMP.
Regionally significant infrastructure	Support with amendments	<i>means <u>regionally significant infrastructure</u> including:</i> <i>a. pipelines for the distribution or transmission of natural or manufactured gas or petroleum, including any associated fittings, appurtenances, fixtures or equipment,</i> <i>b. a network operated for the purposes of telecommunications, as defined in section 5 of the Telecommunications Act 2001,</i> <i>c. a network operated for the purpose of radiocommunications, as defined in section 2(1) of the Radio Communications Act 1989,</i> <i>d. the <u>National Grid</u>,</i> <i>e. facilities for the generation and/or transmission of electricity where it is supplied to the <u>National grid</u> and/or the local distribution network,</i> <i>f. facilities for the electricity distribution network, where it is 11kV and above. This excludes private connections to the local distribution network,</i> <i>g. the local authority <u>water</u> supply network (including intake <u>structures</u>) and <u>water</u> treatments plants,</i> <i>h. the local authority <u>wastewater</u> and <u>stormwater</u> networks and systems, including treatment plants and storage and <u>discharge</u> facilities, and</i> <i>i. the Strategic <u>Transport Network</u> as</i>	<i>means <u>regionally significant infrastructure</u> including:</i> <i>a. pipelines for the distribution or transmission of natural or manufactured gas or petroleum, including any associated fittings, appurtenances, fixtures or equipment,</i> <i>b. a network operated for the purposes of telecommunications, as defined in section 5 of the Telecommunications Act 2001,</i> <i>c. a network operated for the purpose of radiocommunications, as defined in section 2(1) of the Radio Communications Act 1989,</i> <i>d. the <u>National Grid</u>,</i> <i>e. facilities for the generation and/or transmission of electricity where it is supplied to the <u>National grid</u> and/or the local distribution network,</i> <i>f. facilities for the electricity distribution network, where it is 11kV and above. This excludes private connections to the local distribution network,</i> <i>g. the local authority <u>water</u> supply network (including intake <u>structures</u>) and <u>water</u> treatments plants,</i> <i>h. the local authority <u>wastewater</u> and <u>stormwater</u> networks and systems, including treatment plants and storage and <u>discharge</u> facilities, and</i> <i>i. the Strategic <u>Transport Network</u> as</i>	<p>Class 1 landfills are of regional significance and should be part of the list given the essential service it provides to the region. Class 1 landfills accept municipal household solid waste. These types of landfills employ advanced environmental protection systems and cannot be easily replicated or consented. Their continued life is essential where longevity is affected by reverse sensitivity and the waste minimisation efforts.</p> <p>Regional resource recovery facilities are other waste management facilities that are essential to the region, and protect the health and well-being of the community. They should be in the definition.</p> <p>The amendment will ensure that the definition aligns with the definition under the Regional Policy Statement for the Wellington Region.</p>

		identified in the Wellington Regional Land Transport Plan 2021.	identified in the Wellington Regional Land Transport Plan 2021. j. The Silverstream landfill and regional resource recovery facilities	
Reverse sensitivity	Oppose	<p>Activity A causes reverse sensitivity to Activity B when:</p> <ol style="list-style-type: none"> Activity A is a sensitive activity, or a potential activity that would be a sensitive activity, in relation to the effects of Activity B, and Activity B is: <ol style="list-style-type: none"> An existing activity provided for by a designation, and the effects are the same or similar in character, intensity, and scale to those that existed on 6 February 2025, or An activity provided for by a designation whose notice of requirement was lodged on or after 6 February 2025, or An activity or potential activity that the zone in which it is located provides for as a predominant activity, or An activity with a functional need or operational need to locate where it is located, and Activity A is not provided for by a designation, and Activity A: <ol style="list-style-type: none"> Is not an activity that the zone in which it is located provides for as a predominant activity, or Was or would be established after Activity B, or Was not or would not be lawfully established, and The establishing, upgrading, operating, or maintaining of Activity B would have more than minor adverse effects on Activity A (including effects of a type not managed under the Resource Management Act), and The person carrying out Activity B takes the best practicable option to avoid, remedy, or mitigate those effects on Activity A, and The person carrying out Activity B has not contributed to either the establishment or the sensitivity of Activity A (for example through selling the person conducting Activity A the land on which that activity occurs), and The person carrying out Activity B has used all other lawful and reasonable powers available to them to manage or avoid the reverse sensitivity issue, and Despite (6), (7) and (8), Activity B has a significant potential to be constrained in its establishment, upgrading, operation, or maintenance because of regulation under the Resource Management Act 1991, the Health and Safety at Work Act 2015, the Hazardous Substances and New Organisms Act 1996, or 		<p>There is difficulty in reading and interpreting this definition for many plan users. While it covers the parameters under which most circumstances of reverse sensitivity arise in a planning context, it may also confine where reverse sensitivity can be considered – for example where Activity B is not the predominant activity in the zone and they need to argue a functional or operational need? It does not account for unforeseen circumstances where a simpler definition such as the one for the Christchurch District Plan below would allow.</p> <p><i>"means the effect on existing lawful activities from the introduction of new activities, or the intensification of existing activities in the same environment, that may lead to restrictions on existing lawful activities as a consequence of complaints."</i></p>

		<p>other comparable legislation or bylaws that relate to management of the effects of Activity B on Activity A, and</p> <p>10. That constraint could be avoided, remedied, or mitigated through preventing the establishment of Activity A in that location, or placing conditions on Activity A, and</p> <p>11. Considering the factors above, and all other relevant matters, it is reasonable to do so.</p> <p>For the avoidance of doubt, nothing in this plan requires or authorises any rule or condition that would in the guise of managing reverse sensitivity limit any person's right to freedom of expression and association as protected by the New Zealand Bill of Rights Act 1990, including their right to submit on any matter to which they would otherwise be entitled to submit.</p>		
Rural industry	Support with amendments	<p>means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production.</p>	<p>means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production. This includes organic composting.</p>	The definition needs to clarify that organic composting is included under the definition.
Significant hazardous facility	Support	<p>means any facility which involves one or more of the following activities:</p> <ol style="list-style-type: none"> 1. Manufacturing of hazardous substances (including industries manufacturing agrochemicals, fertilisers, acids/alkalis or paints), 2. Oil and gas exploration and extraction facilities, 3. The storage/use of more than 50,000 litres of petrol, 4. The storage/use of more than 100,000 litres of diesel, 5. The storage/use of more than 6 tonnes of LPG, 6. Galvanising plants, 7. Electroplating and metal treatment facilities, 8. Tanneries, 9. Timber treatment, 10. Freezing works and rendering plants, 11. Wastewater treatment plants, 12. Metal smelting and refining (including battery refining or recycling), 13. Milk treatment plants, 14. Fibreglass manufacturing, 15. Polymer foam manufacturing, and 16. Asphalt/bitumen manufacture or storage. 		The definition is supported.
Part 2 District-Wide Matters				
Strategic Direction				

INFSD-O1 Integration	Support with amendments	<i>Land use and development is integrated with the provision of infrastructure, including transport and three waters services, and open space</i>	<i>Land use and development is integrated with the provision of infrastructure, including transport and three waters services, <u>waste facilities</u> and open space</i>	If the addition to the regionally significant infrastructure definition is not accepted as above, then the integration with development of waste recovery and disposal facilities needs to be included in the Strategic Directions chapter and be part of this relevant objective. The submitter considers that amending the definition is preferable to specifically referring to waste facilities under this objective although the objective does include open space which is also not defined as infrastructure and therefore sets a precedence for the inclusion of waste facilities.
INFSD-O2 Coordination	Neutral	<i>The nature, timing and sequencing of new development is co-ordinated with the funding, implementation and operation of necessary transport and other <u>infrastructure</u>.</i>	<i>The nature, timing and sequencing of new development is co-ordinated with the funding, implementation and operation of necessary transport, <u>additional</u> and other <u>infrastructure</u>.</i>	The inclusion of other infrastructure appears to suggest the broader meaning of infrastructure that is not dependent on the definition. If so then the objective is supported as it will encompass waste management facilities. Alternatively, the list should be expanded to include additional infrastructure as per the NPSUD.
INFSD-O3 National and Regional Significance	Support with amendments	<i><u>Infrastructure</u> of national and regional significance is supported and protected.</i>	<i><u>Infrastructure</u> of national and regional significance is supported and protected.</i>	If the addition of the Silverstream landfill and regional resource recovery facilities to the regionally significant infrastructure definition is accepted as above, then this objective is supported, otherwise it should refer to regional waste management infrastructure.
UDSD-O2 Outcomes for Well-Functioning Urban Environments	Support with amendments	<i>Urban development supports the creation of liveable, <u>well-functioning urban environments</u> that are:</i> a. <i>Safe and well-designed,</i> b. <i>Walkable and connected by public transport and sustainable travel choices, including micro-mobility modes,</i> c. <i>Serviced by the necessary <u>infrastructure</u> appropriate to the intensity, scale and function of the development,</i> d. <i>Connected to open space and the natural <u>environment</u>,...</i>	<i>Urban development supports the creation of liveable, <u>well-functioning urban environments</u> that are:</i> a. <i>Safe and well-designed,</i> b. <i>Walkable and connected by public transport and sustainable travel choices, including micro-mobility modes,</i> c. <i>Serviced by the necessary <u>infrastructure</u> (including <u>local infrastructure</u>) appropriate to the intensity, scale and function of the development,</i> d. <i>Connected to open space and the natural <u>environment</u>,...</i>	The proposed addition of 'local infrastructure' would include district or regional resource recovery or waste disposal facilities which are essential to urban growth and development, if not defined as infrastructure as under the Definitions. Notwithstanding waste facilities, there are other types of 'infrastructure' (not defined as such) that are equally important for urban growth and development and should be included in the objective. However, as stated above, the submitter considers regional waste processing and disposal facilities should be listed as infrastructure and therefore considered as infrastructure under this objective.
Infrastructure Chapter				
Foreword	Support with amendments	<i>This chapter outlines the provisions of the District Plan that relate to the operation and development of infrastructure. Infrastructure enables a community to undertake its everyday activities and functions and allows people to provide for their social and economic wellbeing, and their health and safety. The <u>infrastructure</u> managed through this chapter include those defined as infrastructure under section 2 of the Resource Management Act.</i>	<i>This chapter outlines the provisions of the District Plan that relate to the operation and development of infrastructure. Infrastructure enables a community to undertake its everyday activities and functions and allows people to provide for their social and economic wellbeing, and their health and safety. The <u>infrastructure</u> managed through this chapter include those defined as infrastructure under <u>this Plan</u> section 2 of the Resource Management Act. <u>Only the objectives and policies in this chapter apply to the district or regional resource recovery or waste disposal facilities (including the Silverstream Landfill).</u></i>	The addition of this sentence will ensure that there is no confusion in the rules applying to the waste facilities in Hutt City, but that the objectives and policies apply whereby waste facilities are accepted under the definition of Infrastructure.
Relationship with other chapters	Support with amendments	<i>The <u>Infrastructure</u> chapter does not include provisions which address the following:</i> • <i>Green infrastructure and flood mitigations works....</i> • <i>Protection of infrastructure from adverse effects of land use and development, including:</i>	<i>The <u>Infrastructure</u> chapter does not include provisions which address the following:</i> • <i>Green infrastructure and flood mitigations works....</i> • <i>Protection of infrastructure from adverse effects of land use and development, including:</i> • <i><u>Rules for district or regional resource recovery or waste disposal facilities (including the Silverstream Landfill)</u></i>	The amendment clarifies (in conjunction with above) that only the objectives and policies apply to waste infrastructure.
INF-O1 Benefits of infrastructure	Support	<i>The national, regional and local benefits of infrastructure are recognised and provided for.</i>		Provided district or regional resource recovery or waste disposal facilities are considered as infrastructure, this objective is supported. The objective would help provide for the continued operation and upgrading of waste infrastructure and to enable additional waste streams for recovery and recycling.

INF-O2 Adverse effects of infrastructure	Support	<i>The adverse effects of infrastructure on the environment are effectively managed while recognising the functional needs and operational needs of infrastructure.</i>		Provided district or regional resource recovery or waste disposal facilities are considered as infrastructure, this objective is supported. Waste facilities are difficult to consent and landfills require specific locations that have functional and operational needs. As critical infrastructure to the region they should have the benefit of this objective.
INF-O3 Infrastructure availability and capacity	Support	<i>Enable safe, resilient, sustainable, responsive and efficient infrastructure that is well integrated with, and able to meet the needs of, subdivision, use, and development.</i>		As above, provided district or regional resource recovery or waste disposal facilities are considered as infrastructure, this objective is supported. However, if not accepted then additional or local infrastructure should be added to encompass waste management facilities.
INF-P1 Recognise benefits of infrastructure	Support	<i>Recognise the social, economic, cultural and environmental benefits that infrastructure provide, including:</i> <ol style="list-style-type: none">1. <i>Enabling enhancement of the quality of life and standard of living for people and communities,</i>2. <i>Providing for public health and safety,</i>3. <i>Enabling businesses to function,</i>4. <i>Enabling growth and development,</i>5. <i>Enabling the transportation of freight, goods and people,</i>6. <i>Providing a lifeline during emergencies, and</i>7. <i>Enabling the effective, safe, secure and efficient transmission of electricity.</i>		Provided district or regional resource recovery or waste disposal facilities are considered as infrastructure, this objective is supported. The recent rubbish strike in Birmingham has confirmed that waste facilities enhance the quality of life, provide for public health and safety and enable society to function effectively.
INF-P2 Provide for Infrastructure	Support	<i>Provide for infrastructure by:</i> <ol style="list-style-type: none">1. <i>Enabling safe, resilient,</i>		As above
INF-P3 to P6	Support			As above.
INF-R25	Support with amendments	<i>Infrastructure not otherwise provided for or subject to any other rule in chapter</i>	<i>Infrastructure not otherwise provided for or subject to any other rule in chapter (excluding district or regional resource recovery or waste disposal facilities)</i>	As it is proposed that only the objectives and policies apply to waste facilities, this exclusion is sought to ensure clarity in interpretation.
HS-Hazardous Substances				
HS-O2 Protection of existing significant hazardous facilities	Support	Activities sensitive to hazardous substance risks are located where they: <ol style="list-style-type: none">1. Avoid areas exposed to unacceptable residual risk from existing significant hazardous facilities, and2. Do not compromise the operation of existing significant hazardous facilities due to reverse sensitivity effects.		Retain as notified.
HS-O2 Protection of existing significant hazardous facilities	Support	Activities sensitive to hazardous substance risks are located where they: <ol style="list-style-type: none">1. Avoid areas exposed to unacceptable residual risk from existing significant hazardous facilities, and2. Do not compromise the operation of existing significant hazardous facilities due to reverse sensitivity effects.		Retain as notified. Clause 2 recognises that reverse sensitivity effects are a significant issue for facilities.
HS-P1 Location of hazardous facilities	Support with amendments	<i>Ensure facilities and activities involving the manufacture, use, storage, transportation, or disposal of hazardous substances, including significant hazardous facilities, are appropriately located and managed by:</i>	<i>Ensure facilities and activities involving the manufacture, use, storage, transportation, or disposal of hazardous substances, including significant hazardous facilities, are appropriately located and managed by:</i>	It is considered that 'sensitive environments' is too broad and should be reduced in scope in order for facilities to be considered in certain zones.

		<ol style="list-style-type: none"> 1. Avoiding unacceptable residual risk to human health, people, and communities through the use of a Quantitative Risk Assessment for the proposed activity, including its site characteristics and any cumulative risk from other nearby hazardous facilities, 2. Recognising the purpose of the zone in which the proposed activity is located, and the sensitivity of the activities that are enabled in that zone, 3. Locating significant hazardous facilities outside of sensitive environments, and 4. Locating significant hazardous facilities outside of High Natural Hazard Overlays... 	<ol style="list-style-type: none"> 1. Avoiding unacceptable residual risk to human health, people, and communities through the use of a Quantitative Risk Assessment for the proposed activity, including its site characteristics and any cumulative risk from other nearby hazardous facilities, 2. Recognising the purpose of the zone in which the proposed activity is located, and the sensitivity of the activities that are enabled in that zone, 3. Locating significant hazardous facilities outside of <u>zones permitting activities sensitive to hazardous substance risks</u> sensitive environments, and 4. Locating significant hazardous facilities outside of High Natural Hazard Overlays... 	
HS-P3 Location of activities sensitive to hazardous substance risks	Support			Retain as notified
HS – R2 New significant hazardous facilities	Support			The proposed rule is considered appropriate.
HS-R3 New activities sensitive to hazardous substance risks within the Hazardous Substances Risk Management Overlay	Support			The non-complying activity status for new activities sensitive to hazardous risks within the Hazardous Substances Risk Management Overlay is supported and discourage these activities from establishing in the overlay area.
SUB Subdivision				
SUB-O3 Servicing of allotments	Support with amendments	Development enabled through subdivision is adequately serviced and supported by infrastructure and the transport network.	Development enabled through subdivision is adequately serviced and supported by infrastructure <u>(including additional infrastructure)</u> and the transport network.	The District Plan must give effect to the National Policy Statement on Urban Development 2020 ("NPSUD"). Under NPSUD, additional infrastructure is defined (s1.4(1)(b)) as including community infrastructure, which is defined in s197 of the Local Government Act 2002. In this act, community infrastructure includes waste management facilities owned by Council and other infrastructure which is necessary to have a well-functioning urban environment.
SUB-P7 Servicing and access	Support with amendments	<p>Require all <u>allotments</u> created by any <u>subdivision</u> to be adequately serviced as follows:</p> <ol style="list-style-type: none"> 1. Require new <u>infrastructure</u> and upgrades to existing <u>infrastructure</u> to meet the relevant Council engineering standards. 2. Require sufficient <u>infrastructure</u> capacity to accommodate development in accordance with the planned purpose of the zone. 3. Where upgrades to existing <u>infrastructure</u> or new <u>infrastructure</u> are required ensure that the upgraded or new <u>infrastructure</u> have sufficient 	<p>Require all <u>allotments</u> created by any <u>subdivision</u> to be adequately serviced as follows:</p> <ol style="list-style-type: none"> 1. Require new <u>infrastructure</u> and upgrades to existing <u>infrastructure</u> to meet the relevant Council engineering standards. 2. Require sufficient <u>infrastructure</u> capacity to accommodate development in accordance with the planned purpose of the zone. 3. Where upgrades to existing <u>infrastructure</u> or new <u>infrastructure</u> are required ensure that the upgraded or new <u>infrastructure</u> have sufficient 	In Enviro NZ's experience, subdivision design often neglects to consider rubbish truck access. Either roads are designed where trucks cannot fit between parked cars or cycle lane design hinders kerbside bin pickups. Alternatively multi-unit or rear site subdivision does not adequately provide for truck access to bin storage areas. The proposed amendment will ensure that this aspect is considered when subdivision applications are processed.

		<p>capacity to accommodate future development and densities anticipated by the underlying zone.</p> <p>4. Require new <u>roads</u> and new <u>vehicle</u> access to <u>sites</u> to meet minimum design standards to:</p> <ol style="list-style-type: none"> Allow for safe and efficient traffic movements, Provide for pedestrian amenity, and Safely accommodate the intended number of users. <p>5. Require suitable access and connections to reticulated <u>water</u>....</p>	<p>capacity to accommodate future development and densities anticipated by the underlying zone.</p> <p>4. Require new <u>roads</u> and new <u>vehicle</u> access to <u>sites</u> to meet minimum design standards to:</p> <ol style="list-style-type: none"> Allow for safe and efficient traffic movements, Provide for pedestrian amenity, and Safely accommodate the intended number of users. <u>Accommodate solid waste management collection.</u> <p>5. Require suitable access and connections to reticulated <u>water</u>...</p>	
EW - Earthworks				
EW-S1 Area of earthworks	Oppose 2. The area of <u>earthworks</u> must not exceed 500m ² <u>per site</u> in any 12-month period. 2. The area of <u>earthworks</u> must not exceed 5 <u>1000</u> m ² <u>per site</u> in any 12-month period.	For sites in Industrial zones, the 500m ² limit is considered too low and will not allow for efficient development in industrial zones. Doubling this limit would enable most redevelopments without needing specific consent for earthworks which can cause significant delays for projects. The submitter considers an alternative arrangement would be to provide a specific standard for Industrial zones with a higher threshold.
SIGN-Signs				
SIGN-S1 Area of a sign	Support	<p>2. No <u>freestanding sign</u> may be larger than 20m².</p> <p>3. No <u>sign</u> on a <u>building</u> may be larger than 30% of the area of the exterior wall to which it is attached.</p>		The permitted area of a sign in an industrial zone is supported to ensure that business operations can be located by the public and provide sufficient information on the signs.
LLRZ Large Lot Residential Zone				
LLRZ-R20 Servicing	Oppose	<p>1. Activity status: Permitted</p> <p>Where:</p> <ol style="list-style-type: none"> <u>Servicing</u> occurs only between: <ol style="list-style-type: none"> 8:00am to 7:00pm Monday to Friday, 9:00am to 6:00pm Saturday, Sunday, and public holidays. 	<p>1. Activity status: Permitted</p> <p>Where:</p> <ol style="list-style-type: none"> <u>Servicing</u> occurs only between: <ol style="list-style-type: none"> 7<u>8</u>:00am to 7:00pm Monday to Friday, 9:00am to 6:00pm Saturday, Sunday, and public holidays. 	Servicing for refuse pick-ups needs more flexibility in order to accommodate efficient collection. The hours of night-time is questioned also where a 7am finish is considered standard.
MRZ – Medium Density Residential Zone				
MRZ-P12 Urban design outcomes by meeting standard or assessment	Support with amendments	<p>Built development is managed to achieve the following outcomes through either meeting the relevant performance standards, or an alternative approach demonstrated in a resource consent when the relevant performance standards are not met.</p> <p>Where specific existing <u>site</u> 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</p>	<p>Built development is managed to achieve the following outcomes through either meeting the relevant performance standards, or an alternative approach demonstrated in a resource consent when the relevant performance standards are not met.</p> <p>Where specific existing <u>site</u> constraints (such as topography) or other unusual factors affect the ability for built development to achieve these outcomes, the development shall meet the outcomes</p>	Waste is often forgotten and the proposed amendment allows waste storage and collection to be considered as essential infrastructure in the design of medium density residential developments. Without consideration of waste storage and collection in the design of residential neighbourhoods, the quality and functionality of the neighbourhoods are affected through poor outdoor amenity, hygiene, safety for residents and pedestrians, and operational difficulties for waste collectors.

		<p>degree practical.</p> <ol style="list-style-type: none"> 1. Ensure adequate privacy for residential activities and other sensitive activities on the site and on adjacent sites. 2. Ensure adequate access to daylight for residential activities on the site and on adjacent sites. 3. Ensure adequate access to sunlight for existing outdoor living spaces on adjacent sites, and public open space. 4. Create a safe residential environments by enabling passive surveillance. 5. Ensure residential units have access to outdoor living spaces that: <ol style="list-style-type: none"> a. Are located and oriented to ensure good access to sunlight, b. Are of a functional size and configuration, c. Provide screening or landscaping to contribute to privacy, or d. Alternatively, public open space is located nearby that is accessible and functional for residents. 6. Provide a specified amount of landscaping on a site, or a lesser amount that is well-integrated with the development and provides a significant benefit to one or more of: <ol style="list-style-type: none"> a. Aesthetics for the site, neighbouring sites, and the streetscape, b. The management of stormwater, or c. Ecological values. 	<p>to the greatest degree practical.</p> <ol style="list-style-type: none"> 1. Ensure adequate privacy for residential activities and other sensitive activities on the site and on adjacent sites. 2. Ensure adequate access to daylight for residential activities on the site and on adjacent sites. 3. Ensure adequate access to sunlight for existing outdoor living spaces on adjacent sites, and public open space. 4. Create a safe residential environment by enabling passive surveillance. 5. Ensure residential units have access to outdoor living spaces that: <ol style="list-style-type: none"> a. Are located and oriented to ensure good access to sunlight, b. Are of a functional size and configuration, c. Provide screening or landscaping to contribute to privacy, or d. Alternatively, public open space is located nearby that is accessible and functional for residents. 6. Provide a specified amount of landscaping on a site, or a lesser amount that is well-integrated with the development and provides a significant benefit to one or more of: <ol style="list-style-type: none"> a. Aesthetics for the site, neighbouring sites, and the streetscape, b. The management of stormwater, or c. ecological values. 7. <u>incorporates adequate space for waste storage and collection</u> 	
MRZ-P13 Urban design outcomes for non-residential activities and developments of more than 3 residential units	Support with amendments	<ol style="list-style-type: none"> 1. 4. Ensure that activities have storage and servicing areas that: <ol style="list-style-type: none"> a. Are of a functional size, b. Are integrated into the site design to ensure they are conveniently located, accessible, secure, and minimise visual intrusion, and c. Do not create health and safety hazards or nuisance (such as odour) for on-site residents or adjacent sites. 	<ol style="list-style-type: none"> 1. 4. Ensure that activities have storage and servicing areas (including waste) that: <ol style="list-style-type: none"> a. Are of a functional size, b. Are integrated into the site design to ensure they are conveniently located, accessible, secure, and minimise visual intrusion, and c. Do not create health and safety hazards or nuisance (such as odour) for on-site residents or adjacent sites. 	While the definition for servicing includes refuse, it is not clear that the storage and servicing areas includes waste storage. Ensuring good design of waste storage areas results in good outcomes from no odour, good accessibility, lighting, and privacy to other residents.
MRZ-R3 Construction of new buildings and structures and alterations to existing buildings and structures	Support with amendments	<ol style="list-style-type: none"> 1. Activity status: Permitted Where: <ol style="list-style-type: none"> a. Compliance is achieved with: <ol style="list-style-type: none"> i. MRZ-S2: Building coverage, ii. MRZ-S3: Building height, iii. MRZ-S4: Height in relation to boundary, iv. MRZ-S5: Setbacks, v. MRZ-S6: Height in relation to boundary and setbacks for site boundaries adjoining the Marae Zone, vi. MRZ-S7: Permeable surface, 	<ol style="list-style-type: none"> 1. Activity status: Permitted Where: <ol style="list-style-type: none"> a. Compliance is achieved with: <ol style="list-style-type: none"> i. MRZ-S2: Building coverage, ii. MRZ-S3: Building height, iii. MRZ-S4: Height in relation to boundary, iv. MRZ-S5: Setbacks, v. MRZ-S6: Height in relation to boundary and setbacks for site boundaries adjoining the Marae Zone, vi. MRZ-S7: Permeable surface, 	New buildings and alterations can have the potential to alter and dislocate the areas needed for waste storage and collection. Ensuring that any new buildings and/or additions continue to cater for the waste storage areas will ensure that this essential infrastructure continues to operate efficiently and effectively without adverse effects.

		<p>vii. MRZ-S8: Outdoor living space,</p> <p>viii. MRZ-S9: Outlook space,</p> <p>ix. MRZ-S10 Windows to street, and</p> <p>x. MRZ-S11: Landscaped area.</p>	<p>vii. MRZ-S8: Outdoor living space,</p> <p>viii. MRZ-S9: Outlook space,</p> <p>ix. MRZ-S10 Windows to street, and</p> <p>x. MRZ-S11: Landscaped area.</p> <p>xi. MRZ-S12 Waste Management</p>	
MRZ-R4 Residential activities		<p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. Compliance is achieved with:</p> <p>i. MRZ-S1: Number of residential units,</p> <p>ii. MRZ-S8: Outdoor living space,</p> <p>iii. MRZ-S9: Outlook space,</p> <p>iv. MRZ-S10 Windows to street, and</p> <p>v. MRZ-S11: Landscaped area.</p>	<p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. Compliance is achieved with:</p> <p>i. MRZ-S1: Number of residential units,</p> <p>ii. MRZ-S8: Outdoor living space,</p> <p>iii. MRZ-S9: Outlook space,</p> <p>iv. MRZ-S10 Windows to street, and</p> <p>v. MRZ-S11: Landscaped area</p> <p>vi. MRZ-S12 Waste Management</p>	The proposed on-site rubbish storage and collection standard should apply as each dwelling needs to have either individual or communal rubbish storage area. Without requiring it at the start of the development process impacts result on the quality and functionality of residential developments and lead to unsafe street environments when pedestrians and cyclists cannot navigate around bins.
MRZ-R21 Servicing	Support with amendments	<p>2. Activity status: Permitted</p> <p>Where:</p> <p>a. Servicing occurs only between:</p> <p>i. 8:00am to 7:00pm Monday to Friday,</p> <p>ii. 9:00am to 6:00pm Saturday, Sunday, and public holidays.</p>	<p>2. Activity status: Permitted</p> <p>Where:</p> <p>a. Servicing occurs only between:</p> <p>i. 78:00am to 7:00pm Monday to Friday,</p> <p>ii. 9:00am to 6:00pm Saturday, Sunday, and public holidays.</p>	Servicing for refuse pick-ups needs more flexibility in order to accommodate efficient collection. The hours of night-time is questioned also where a 7am finish is considered standard.
MRZ – S12 Waste Management	New standard for the Medium Density Residential Precinct		<p>1. Each independent dwelling unit shall provide a waste management area with a minimum area of 1.5m2 and a minimum dimension of 1 metre in any direction, except:</p> <p>a) Where a communal waste management area is provided to accommodate bulk collection from within the site;</p> <p>2. Waste management areas must be screened so they are not visible from a legal road, ground floor of adjoining residential sites, and open space zones;</p> <p>3. Waste management areas must not encroach onto driveways, manoeuvring areas, parking, and outdoor living areas and be accessible for residents to get to the kerb without stairs or steep gradients.</p> <p>4. A kerbside space of 1m per dwelling is available without impeding the footpath</p>	Given that three dwellings are permitted on sites where density can be significantly less than 1 unit per 200m ² , the space allocated for waste management is often not thought about or not designed for, given the tight building envelopes required for this density. Bin storage that is not designed for can generate adverse effects on amenity and the health and safety of residents, road corridor users and collection staff. The proposed standard allows for bin storage to be of a sufficient size, and in a location that will be screened from the road or access to the site. The standard requires bins to be accessible so that when moving from their storage location to the kerbside, the access is without steep gradients or stairs and is wide enough for bin access. The standard will ensure that bins do not obstruct driveways or be located on the footpath.
HRZ – High Density Residential Zone				
HRZ-O4 Planned character and planned urban	Support with amendments	<p><i>Built development in the High Density Residential Zone will positively contribute to a predominantly residential urban environment that:</i></p> <p>1. <i>Comprises buildings and spaces</i></p>	<p><i>Built development in the High Density Residential Zone will positively contribute to a predominantly residential urban environment that:</i></p> <p>1. <i>Comprises buildings and spaces</i></p>	Waste is often the ‘forgotten’ infrastructure and the proposed amendment allows waste storage and collection to be considered as essential infrastructure in the design of higher density residential developments. Without consideration of waste storage and collection in the design of residential neighbourhoods, the quality and functionality of the neighbourhoods are affected through poor outdoor amenity, hygiene, safety for residents and pedestrians, and operational difficulties for

built environment of the High Density Residential Zone		surrounding buildings, sites, streets... 7.Is integrated with existing and planned infrastructure	surrounding buildings, sites, streets... 7.Is integrated with existing and planned infrastructure <u>including waste storage and collection</u>	waste collectors.
HRZ-P12 Urban design outcomes by meeting standard or assessment	Support with amendments	<p>Built development is managed to achieve the following outcomes through either meeting the relevant performance standards, or an alternative approach demonstrated in a resource consent when the relevant performance standards are not met.</p> <p>Where specific existing <u>site</u> 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> <ol style="list-style-type: none"> 1. Ensure adequate privacy for <u>residential activities</u> and other <u>sensitive activities</u> on the <u>site</u> and on adjacent <u>sites</u>. 2. Ensure adequate access to daylight for <u>residential activities</u> on the <u>site</u> and on adjacent <u>sites</u>. 3. Ensure adequate access to sunlight for existing <u>outdoor living spaces</u> on adjacent <u>sites</u>, and public open space. 4. Create a safe residential <u>environment</u> by enabling passive surveillance. 5. Ensure <u>residential units</u> have access to <u>outdoor living spaces</u> that: <ol style="list-style-type: none"> a. Are located and oriented to ensure good access to sunlight, b. Are of a <u>functional</u> size and configuration, c. Provide screening or <u>landscaping</u> to contribute to privacy, or d. Alternatively, public open space is located nearby that is accessible and <u>functional</u> for residents. 6. Provide a specified amount of <u>landscaping</u> on a <u>site</u>, or a lesser amount that is well-integrated with the development and provides a significant benefit to one or more of: <ol style="list-style-type: none"> a. Aesthetics for the <u>site</u>, neighbouring <u>sites</u>, and the streetscape, b. The management of <u>stormwater</u>, or c. Ecological values. 	<p>Built development is managed to achieve the following outcomes through either meeting the relevant performance standards, or an alternative approach demonstrated in a resource consent when the relevant performance standards are not met.</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> <ol style="list-style-type: none"> 1. Ensure adequate privacy for residential activities and other sensitive activities on the site and on adjacent sites. 2. Ensure adequate access to daylight for residential activities on the site and on adjacent sites. 3. Ensure adequate access to sunlight for existing outdoor living spaces on adjacent sites, and public open space. 4. Create a safe residential environment by enabling passive surveillance. 5. Ensure residential units have access to outdoor living spaces that: <ol style="list-style-type: none"> a. Are located and oriented to ensure good access to sunlight, b. Are of a functional size and configuration, c. Provide screening or landscaping to contribute to privacy, or d. Alternatively, public open space is located nearby that is accessible and functional for residents. 6. Provide a specified amount of landscaping on a site, or a lesser amount that is well-integrated with the development and provides a significant benefit to one or more of: <ol style="list-style-type: none"> a. Aesthetics for the site, neighbouring sites, and the streetscape, b. The management of stormwater, or c. ecological values. 7. <u>incorporates adequate space for waste storage and collection</u> 	<p>Waste is often forgotten and the proposed amendment allows waste storage and collection to be considered as essential infrastructure in the design of high density residential developments. Without consideration of waste storage and collection in the design at the outset, the quality and functionality of the neighbourhoods are affected through poor outdoor amenity, hygiene, safety for residents and pedestrians, and operational difficulties for waste collectors.</p>
HRZ-P13 Urban design outcomes for non-residential activities and developments of more than 3 residential units	Support with amendments	<ol style="list-style-type: none"> 1. 4. Ensure that activities have storage and <u>servicing</u> areas that: <ol style="list-style-type: none"> a. Are of a <u>functional</u> size, b. Are integrated into the <u>site</u> design to ensure they are conveniently located, accessible, secure, and minimise visual intrusion, and c. Do not create health and safety hazards or nuisance (such as odour) for on-<u>site</u> residents or adjacent <u>sites</u>. 	<ol style="list-style-type: none"> 1. 4. Ensure that activities have storage and servicing areas (<u>including waste</u>) that: <ol style="list-style-type: none"> a. Are of a functional size, b. Are integrated into the site design to ensure they are conveniently located, accessible, secure, and minimise visual intrusion, and c. Do not create health and safety hazards or nuisance (such as odour) for on-site residents or adjacent sites. 	<p>While the definition for servicing includes refuse, it is not clear that the storage and servicing areas includes waste storage. Ensuring good design of waste storage areas results in good outcomes from no odour, good accessibility, lighting, and privacy to other residents.</p>

HRZ-R3 Construction of new buildings and structures and alterations to existing buildings and structures	Support with amendments	<p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. Compliance is achieved with:</p> <ul style="list-style-type: none"> i. HRZ-S2: Building coverage, ii. HRZ-S3: Building height, iii. HRZ-S4: Height in relation to boundary, iv. HRZ-S5: Setbacks, v. HRZ-S6: Height in relation to boundary and setbacks for site boundaries adjoining the Marae Zone, vi. HRZ-S7: Permeable surface, vii. HRZ-S8: Outdoor living space, viii. HRZ-S9: Outlook space, ix. HRZ-S10: Windows to street and x. HRZ-S11: Landscaped area. 	<p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. Compliance is achieved with:</p> <ul style="list-style-type: none"> i. HRZ-S2: Building coverage, ii. HRZ-S3: Building height, iii. HRZ-S4: Height in relation to boundary, iv. HRZ-S5: Setbacks, v. HRZ-S6: Height in relation to boundary and setbacks for site boundaries adjoining the Marae Zone, vi. HRZ-S7: Permeable surface, vii. HRZ-S8: Outdoor living space, viii. HRZ-S9: Outlook space, ix. HRZ-S10: Windows to street and x. HRZ-S11: Landscaped area. xii. MRZ-S12 Waste Management 	New buildings and alterations can have the potential to alter and dislocate the areas needed for waste storage and collection. Ensuring that any new buildings and/or additions continue to cater for the waste storage areas will ensure that this essential infrastructure continues to operate efficiently and effectively without adverse effects.
HRZ-R4 Residential activities	Support with amendments	<p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. Compliance is achieved with:</p> <ul style="list-style-type: none"> i. HRZ-S1: Number of residential units, ii. HRZ-S8: Outdoor living space, iii. HRZ-S9: Outlook space, iv. HRZ-S10 Windows to street, and v. HRZ-S11: Landscaped area. 	<p>1. Activity status: Permitted</p> <p>Where:</p> <p>a. Compliance is achieved with:</p> <ul style="list-style-type: none"> i. MRZ-S1: Number of residential units, ii. MRZ-S8: Outdoor living space, iii. MRZ-S9: Outlook space, iv. MRZ-S10 Windows to street, and v. MRZ-S11: Landscaped area vi. MRZ-S12 Waste Management 	The proposed on-site rubbish storage and collection standard should apply as each dwelling needs to have either individual or communal rubbish storage area. Without requiring it at the start of the development process impacts result on the quality and functionality of residential developments and lead to unsafe street environments when pedestrians and cyclists cannot navigate around bins.
M HRZ-R22 Servicing	Support with amendments	<p>1 . Activity status: Permitted</p> <p>Where:</p> <p>b. Servicing occurs only between:</p> <ul style="list-style-type: none"> i. 8:00am to 7:00pm Monday to Friday, ii. 9:00am to 6:00pm Saturday, Sunday, and public holidays. 	<p>3. Activity status: Permitted</p> <p>Where:</p> <p>a. Servicing occurs only between:</p> <ul style="list-style-type: none"> i. 8:00am to 7:00pm Monday to Friday, ii. 9:00am to 6:00pm Saturday, Sunday, and public holidays. 	Servicing for refuse pick-ups needs more flexibility in order to accommodate efficient collection. The hours of night-time is questioned also where a 7am finish is considered standard.
HRZ - S12 Waste Management	New standard for the High Density Residential Zone		<p>1. Each independent dwelling unit shall provide a waste management area with a minimum area of 1.5m2 and a minimum dimension of 1 metre in any direction, except:</p> <p>A. Where a communal waste management area is provided to accommodate bulk collection from within the site;</p> <p>2. Waste management areas must be screened so they are not visible from a legal road, ground floor of adjoining residential sites, and open space zones;</p> <p>3. Waste management areas must not encroach onto driveways, manoeuvring areas, parking, and outdoor living areas and be accessible for residents to get to.</p>	Given that three dwellings are permitted on sites where density can be significantly less than 1 unit per 200m ² , and high density is encouraged, the space allocated for waste management is often not thought about or not designed for, given the tight building envelopes required for higher density developments. Bin storage that is not designed for can generate adverse effects on amenity and the health and safety of residents, road corridor users and collection staff. The proposed standard allows for bin storage to be of a sufficient size, and in a location that will be screened from the road or access to the site. The standard requires bins to be accessible so that when moving from their storage location to the kerbside, the access is without steep gradients or stairs and is wide enough for bin access. The standard will ensure that bins do not obstruct driveways or be located on the footpath.

			<u>the kerb without stairs or steep gradients.</u> <u>4. A kerbside space of 1m per dwelling is available without impeding the footpath</u> <u>5. Where a communal waste management area is provided :-</u> <u>a. the space must be accessible for the collection vehicle and sized to provide separation of waste streams.</u>	
GRUZ - General Rural Zone				
GRUZ-O2 Activities in the zone	Support			Retain as notified. Enviro NZ particularly supports Clause (b)(iv).
GRUZ-O3 Built Character	Support			Retain as notified. The proposed amendment is to acknowledge that not all noise, etc, effects are derived from primary production activities. Some of these effects result from rural industry and other activities which need to be allowed for.
GRUZ-O4 Adverse effects	Support			Retain as notified. This objective is supported with the proposed amendment which ensures that essential infrastructure can be provided as detailed under the submission for GRUZ-O1..
GRUZ-QZPO-O1 Protection of the quarrying activities in the Quarry Zone	Support			Retain as notified. The proposed additional text will strengthen the objective to avoid reverse sensitivity effects on those rural land uses described, which need protection from encroaching subdivision and sensitive activities. These land uses include regional infrastructure.
GRUZ-P2 Compatible activities	Support			Retain as notified
GRUZ-P3 Potentially incompatible activities	Support			Retain as notified.
GRUZ-QZPO-P1 Activities in the Quarry Zone Protection Overlay	Support			Retain as notified.
GRUZ-R15 Quarrying activities	Support	1. Activity status: Discretionary		Retain as notified
GRUZ-R16 Landfills and cleanfills	Support	1. Activity status: Discretionary		Retain as notified.
GRUZ- R17 Solid waste transfer stations	Support	1. Activity status: Discretionary		Retain as notified.
RLZ - Rural Lifestyle Zone				
RLZ-O2 Activities in the zone	Support			Retain as notified.

RLZ-P3 Potentially incompatible activities	Neutral			
RLZ-R13 Rural industries	Neutral	1. Activity status: Discretionary		
RLZ-R21 Industrial activities	?	1. Activity status: Non-complying		
LIZ- Light Industrial Zone				
LIZ-O2 Activities in the zone	Oppose	<p><i>The Light Industrial Zone:</i></p> <ol style="list-style-type: none"> 1. Primarily provides for industrial activities and research activities,.... 4. Provides for other activities that: <ol style="list-style-type: none"> a. Are compatible with the purpose, the planned character, and the planned urban environment of the zone, b. Do not undermine the role of commercial centres, and c. One or more of the following: <ol style="list-style-type: none"> i. Have a functional need or operational need to locate in an Industrial Zone, or ii. Have significant co-location benefits when located in the area, or iii. Are a commercial activity that is not suited to being in a commercial centre, or iv. Due to the size, layout, or operation of the activity, would have difficulty finding a suitable site in any other zone, or v. Are otherwise better located in an Industrial Zone than in any other type of zone, or vi. Are an interim use and do not create obstacles to re-using their sites for industrial activities or research activities in future. 	<p><i>The Light Industrial Zone:</i></p> <ol style="list-style-type: none"> 1. Primarily provides for industrial activities and research activities,.... 4Provides for other activities that: <ol style="list-style-type: none"> a. Are compatible with the purpose, the planned character, and the planned urban environment of the zone, b. Do not undermine the role of commercial centres, and c. One or more of the following: <ol style="list-style-type: none"> i. Have a functional need or operational need to locate in an Industrial Zone, or ii. Have significant co-location benefits when located in the area, or iii. Are a commercial activity that is not suited to being in a commercial centre, or iv. Due to the size, layout, or operation of the activity, would have difficulty finding a suitable site in any other zone, or v. Are otherwise better located in an Industrial Zone than in any other type of zone, or vi. Are an interim use and do not create obstacles to re-using their sites for industrial activities or research activities in future. 	Clauses iii, iv, and v will open the door to activities in the zone that are not compatible to industrial activities and cause reverse sensitivity to existing activities. These clauses should be deleted.
LIZ-P2 Residential activities and other activities sensitive to industry	Oppose			
GIZ – GENERAL INDUSTRIAL ZONE				

GIZ-O1 Purpose of the Zone	Oppose	<p>The General Industrial Zone is used primarily to meet the needs of industrial and research activities and their supporting activities, particularly those activities that due to their adverse effects should be separated from residential activities and other activities sensitive to industry.</p> <p>The Zone also provides for other compatible activities that support this role or do not interfere with the primary purpose, including commercial activities that are not appropriately located outside industrial areas because of their effects on amenity values or co-location benefits with industrial and research activities.</p>	<p>The General Industrial Zone is used primarily to meet the needs of industrial and research activities and their supporting activities, particularly those activities that due to their adverse effects should be separated from residential activities and other activities sensitive to industry.</p> <p>The Zone also provides for other compatible activities that support this role or do not interfere with the primary purpose, including commercial activities that are not appropriately located outside industrial areas because of their effects on amenity values or co-location benefits with industrial and research activities.</p>	<p>Due to the difficulty of industrial activities locating anywhere else in the city, the purpose of the zone statement should reflect the needs of these industrial activities rather than 'inviting' commercial activities to locate there.</p>
GIZ-O2 Activities in the zone	Oppose	<p>The General Industrial Zone:</p> <ol style="list-style-type: none"> 1. Primarily provides for industrial activities and research activities, 2. Provides for emergency facilities and trade and industrial training activities, 3. Is supported by other activities that: <ol style="list-style-type: none"> a. Are compatible with the purpose, the planned character, and the planned urban environment of the zone, b. Do not create unreasonable reverse sensitivity effects that constrain the use of the General Industrial Zone for industrial activities and research activities, c. Do not create unreasonable reverse sensitivity effects that constrain the use of the Heavy Industrial Zone for heavy industrial activities, d. Do not undermine the role of commercial centres, and e. Support the industrial activities and research activities in the zone, including the needs of workers at those activities. 4. Provides for other activities that: <ol style="list-style-type: none"> a. Are compatible with the purpose, the planned character, and the planned urban environment of the zone, b. Do not create unreasonable reverse sensitivity effects that constrain the use of the General Industrial Zone for industrial activities and research activities, c. Do not create unreasonable reverse sensitivity effects that constrain the use of the Heavy Industrial Zone for heavy industrial activities, d. Do not undermine the role of commercial centres, and e. One or more of the following: <ol style="list-style-type: none"> i. Have a functional need or operational need to locate in the General Industrial Zone, or ii. Have significant co-location benefits when located in the area, or iii. Are better located in an Industrial Zone than in any other zone, or iv. Due to the size, layout, or 	<p>The General Industrial Zone:</p> <ol style="list-style-type: none"> 1. Primarily provides for industrial activities and research activities, 2. Provides for emergency facilities and trade and industrial training activities, 3. Is supported by other activities that: <ol style="list-style-type: none"> a. Are compatible with the purpose, the planned character, and the planned urban environment of the zone, b. Do not create unreasonable reverse sensitivity effects that constrain the use of the General Industrial Zone for industrial activities and research activities, c. Do not create unreasonable reverse sensitivity effects that constrain the use of the Heavy Industrial Zone for heavy industrial activities, d. Do not undermine the role of commercial centres, and e. Support the industrial activities and research activities in the zone, including the needs of workers at those activities. 4. Only allow Provides for other activities that: <ol style="list-style-type: none"> a. Are compatible with the purpose, the planned character, and the planned urban environment of the zone, b. Do not create unreasonable reverse sensitivity effects that constrain the use of the General Industrial Zone for industrial activities and research activities, c. Do not create unreasonable reverse sensitivity effects that constrain the use of the Heavy Industrial Zone for heavy industrial activities, d. Do not undermine the role of commercial centres, and e. One or more of the following: <ol style="list-style-type: none"> i. Have a functional need or operational need to locate in the General Industrial Zone, or ii. Have significant co-location benefits when located in the area, or iii. Are better located in an Industrial Zone than in any other zone, or iv. Due to the size, layout, or operation of the activity, would have difficulty finding a suitable site in any other zone, or v. Are an interim use and do not create obstacles to re-using their site for industrial activities or research activities in future. 5. Is not intended to provide for: <ol style="list-style-type: none"> a. Residential activities, 	<p>The zone should emphasise its main activities and therefore the word primarily is not required nor necessary as it promotes other uses in the zone when industrial uses can only locate in an industrial zone.</p> <p>It would be impossible to determine what is an unreasonable reverse sensitivity effect. Any complaint has the potential to constrain the industrial or heavy industrial activity, therefore the word unreasonable is unreasonable in this context.</p> <p>Enviro NZ is also concerned that providing for other activities is too enabling and questions whether 4 should be there at all when the activities that support the zone function would allow for the majority of other uses.</p>

		<p>operation of the activity, would have difficulty finding a suitable site in any other zone, or</p> <p>v. Are an interim use and do not create obstacles to re-using their site for industrial activities or research activities in future.</p> <p>5. Is not intended to provide for:</p> <p>a. Residential activities,</p> <p>b. Other activities sensitive to industry, and</p> <p>c. Activities that would be a city-wide or regional destination for significant numbers of visitors.</p>	<p>b. Other activities sensitive to industry, and</p> <p>c. Activities that would be a city-wide or regional destination for significant numbers of visitors.</p>	
GIZ-O3 Provision of industrial spaces	Support			Retain as notified
GIZ-P2 Residential activities and other activities sensitive to industry	Oppose	<p>Avoid new residential activities and other activities sensitive to industry unless they are:</p> <ol style="list-style-type: none"> 1. Ancillary to and support an industrial activity, research activity, or emergency facility, 2. Managed so that they do not adversely impact the long-term development capacity of the zone for industrial development, including through managing the design of new buildings, and 3. Managed to minimise reverse sensitivity effects for industry, including existing heavy industry. 	<p>Avoid new residential activities and other activities sensitive to industry unless they are:</p> <ol style="list-style-type: none"> 1. Ancillary to and support an industrial activity, research activity or emergency facility (such as a caretaker residence), 2. Managed so that they do not adversely impact the long-term development capacity of the zone for industrial development, including through managing the design of new buildings, and 3. Require no complaints covenants to Managed to minimise reverse sensitivity effects for industry, including existing heavy industry 	<p>The parameters for the establishment of residential and sensitive activities in this zone need to be tightened to ensure that these activities do not cause reverse sensitivity effects, which is the main premise for the zone. The current wording is too permissive.</p> <p>How are they to be managed to minimise reverse sensitivity? No complaints covenants while not always effective will reduce the potential for complaints, however the reverse sensitivity should be minimised not managed.</p>
GIZ-P3 Heavy industrial activities	Oppose	<p>Avoid heavy industrial activities unless they:</p> <ol style="list-style-type: none"> 1. Have an operational or functional need to operate at the specific site proposed, or 2. Are managed to have no significant adverse effects different in scale or character to those from activities primarily provided for in the zone. 	<p>Avoid Allow heavy industrial activities if unless they:</p> <ol style="list-style-type: none"> 1. Have an operational or functional need to operate at the specific site proposed, or 2. Are managed to have no significant adverse effects different in scale or character to those from activities primarily provided for in the zone. 	<p>Enviro NZ finds it perplexing the stance taken on the choice of activities in the General Industrial zone when commercial activities are enabled and heavy industrial activities avoided. While ideally heavy industrial activities are located in the heavy industrial zone, they should only be restricted when they do not meet the criteria rather than avoided.</p>
GIZ-P4 Other potentially incompatible activities	Oppose	<p>Avoid commercial and community activities unless they:</p> <ol style="list-style-type: none"> 1. Are ancillary to a permitted activity and support the purpose of the zone, or 2. Primarily serve the immediate area within the zone, or 3. Have similar adverse effects and requirements to industrial activities that mean they are better located in an Industrial Zone than anywhere else (for example, trade supply retail activities and yard-based retail activities), or 4. Primarily serve surrounding suburbs but a suitable available site is unlikely to be available for the activity in a commercial centre (for example, supermarkets), or 5. Have significant co-location benefits with existing industrial. 	<p>Avoid commercial and community activities unless they:</p> <ol style="list-style-type: none"> 1. Are ancillary to an industrial or research permitted activity and support the purpose of the zone, or 2. Primarily serve the immediate area within the zone, or 3. Have similar adverse effects and requirements to industrial activities that mean they are better located in an Industrial Zone than anywhere else (for example, small-scale trade supply retail activities and yard-based retail activities), or 4. Primarily serve surrounding suburbs but a suitable available site is unlikely to be available for the activity in a commercial centre (for example, supermarkets), or 5. Have significant co-location benefits with existing industrial activities or research activities in an Industrial Zone. 	<p>The policy requires a stricter focus on reducing the criteria on when other activities are compatible in the zone. Given the number of permitted activities in the zone, returning the focus to the purpose of the zone ensures compatibility to the core purpose.</p> <p>Qualifying the scale of trade supply retail and yard-based retail will ensure that big box retail is not supported by the policy.</p> <p>Reverse sensitivity to industrial activities only becomes apparent when complaints are made which is too late to 'manage' them, and it is considered that the word 'significant' is not required. Site and building design is considered a better option if the activity is to be allowed.</p>

		<u>activities</u> or <u>research activities</u> in an Industrial Zone. When these activities are not avoided, they are managed to avoid significant <u>reverse sensitivity</u> issues for industry, including heavy industry that is an <u>existing activity</u> .	When these activities are not avoided, they are <u>designed</u> managed to avoid significant <u>reverse sensitivity</u> issues for industry, including heavy industry that is an <u>existing activity</u> .	
GIZ-P6 Role in network of commercial and industrial areas	Oppose	Recognise General Industrial areas as providing for <u>commercial activities</u> that can only effectively locate in Industrial areas because of their adverse <u>effects</u> , or <u>co-location benefits</u> with industrial and <u>research activities</u> .	Recognise General Industrial areas as providing for <u>commercial activities</u> that can only effectively locate in Industrial areas because of their adverse <u>effects</u>, or <u>co-location benefits</u> with industrial and <u>research activities</u>.	The rationale for this policy is questioned, with the submitter unsure of the types of commercial activities that may come under the policy. It would likely only apply to very few commercial activities and therefore should be deleted.
GIZ-P7 Support of centres hierarchy	Support with amendments	Manage the scale and location of <u>commercial activities</u> to avoid negative impacts on the intended purpose, viability, vibrancy, and <u>co-location benefits</u> of <u>commercial centres</u> in the City Centre Zone, Metropolitan Centre Zone, and Local Centre Zone.	Manage <u>Restrict</u> the scale and location of <u>commercial activities</u> to avoid negative impacts on the intended purpose, viability, vibrancy, and <u>co-location benefits</u> of <u>commercial centres</u> in the City Centre Zone, Metropolitan Centre Zone, and Local Centre Zone.	The emphasis of the zone needs to be on industrial and research activities and therefore restricting rather than managing is more appropriate. This will also provide a stronger support for the commercial zones.
GIZ-P8 Development Capacity	Support			Retain as notified.
GIZ-P9 Urban design outcomes (by meeting standard or assessment)	Support with amendment The outcomes are: 1. <u>Vehicle</u> parking and loading areas, accessways, and garages are designed to provide for pedestrian safety, comfort, dignity, and amenity. 2. The form and scale of development contributes to visual amenity in <u>public space</u> . 3. The form and scale of development protects access to sunlight and daylight in well-used streets and <u>public spaces</u> . 4. Ensure adequate privacy for <u>activities sensitive to privacy intrusion</u> , on the <u>site</u> and on adjacent <u>sites</u> . 5. Ensure adequate access to daylight for <u>residential activities</u> on adjacent residential zone <u>sites</u> . 6. Ensure adequate access to sunlight for existing <u>outdoor living spaces</u> on adjacent residential zone <u>sites</u> , and public open space. The outcomes are: 1. <u>Vehicle</u> parking and loading areas, accessways, and garages are designed to provide for pedestrian safety, <u>and accessibility</u> comfort, dignity, and amenity. 2. The form and scale of development contributes to visual amenity in <u>public space</u> . 3. The form and scale of development protects access to sunlight and daylight in well-used streets and <u>public spaces</u> . 4. Ensure adequate privacy for <u>activities sensitive to privacy intrusion</u> , on <u>adjacent zones</u> the <u>site</u> and on adjacent <u>sites</u> . 5. Ensure adequate access to daylight for <u>residential activities</u> on adjacent residential zone <u>sites</u> . 6. Ensure adequate access to sunlight for existing <u>outdoor living spaces</u> on adjacent residential zone <u>sites</u> , and public open space.	The submitter considers that safety and accessibility are key but are very confused as to a pedestrian's dignity. When the zone is for industrial activities it seems non-sensical for having an outcome for privacy intrusion within the zone.
GIZ-P10 Urban design outcomes (other than industrial activities and research activities)	Oppose		Delete	The design outcomes proposed do not promote an industrial style setting and appear to promote non-industrial uses. It should be deleted apart from Clause (6).
GIZ-R10 Grocery stores and supermarkets	Oppose	1. Activity status: Permitted Where: The activity has a gross floor area of no more than 200m ² . 2. Activity status: Restricted discretionary Where: Compliance is not achieved with GIZ-R10.1.	1. Activity status: Permitted Where: The activity has a gross floor area of no more than 200m ² . 2. Activity status: Restricted Discretionary Where: Compliance is not achieved with GIZ-R10.1. ...	Grocery stores or supermarkets larger than 200m ² should be discretionary in the zone, given their ability to create reverse sensitivity effects on industrial uses due to their high visitor numbers.

GIZ-R11 Food and beverage activities	Oppose	<p>1. <i>Activity status: Permitted</i> Where: The activity has a gross floor area of no more than 200m².</p> <p>2. <i>Activity status: Restricted discretionary</i> Where: Compliance is not achieved with GIZ-R11.1.</p>	<p>1. <i>Activity status: Permitted</i> Where: The activity has a gross floor area of no more than 200m².</p> <p>2. <i>Activity status: Restricted Discretionary</i> Where: Compliance is not achieved with GIZ-R11.1. ...</p>	Limiting the establishment of food and beverage over a 200m ² threshold with a discretionary activity status will ensure that suitably narrow exceptions for food and beverage activities to occur. The rule is currently too weak and will lead to cumulative effects, negating the purpose of the zone for industrial activities.
GIZ – R14 Yard-based retailing	Support with amendments	<p>1. Activity status: Permitted Where: a. The activity is ancillary to an industrial activity, or b. The indoor part of the activity has a gross floor area of no more than 200m², or c. The indoor part of the activity takes place in an existing building.</p> <p>2. <i>Activity status: Restricted discretionary</i> Where: a. Compliance is not achieved with GIZ-R14.1.</p>	<p>1. Activity status: Permitted Where: a. The activity is ancillary to an industrial activity on the same site, and or b. The indoor part of the activity has a gross floor area of no more than 200m², or c. The indoor part of the activity takes place in an existing building.</p> <p>2. <i>Activity status: Restricted Discretionary</i> a. Compliance is not achieved with GIZ-R14.1.</p>	Limiting the establishment of yard-based retailing over a 200m ² threshold with a discretionary activity status will ensure that suitably narrow exceptions allow these activities to occur. The rule is currently too weak and will lead to cumulative effects, negating the purpose of the zone for industrial activities.
GIZ-R15 Trade supply retail activities	Support with amendments	<p>1.Activity status: Permitted Where: a. The activity is ancillary to an industrial activity, or b. The indoor part of the activity has a gross floor area of no more than 200m², or c. The indoor part of the activity takes place in an existing building.</p> <p>2.<i>Activity status: Restricted discretionary</i> Where: b. Compliance is not achieved with GIZ-R15.1.</p>	<p>1.Activity status: Permitted Where: b. The activity is ancillary to an industrial activity on the same site, and or c. The indoor part of the activity has a gross floor area of no more than 200m², or d. The indoor part of the activity takes place in an existing building.</p> <p>2.<i>Activity status: Restricted Discretionary</i> Compliance is not achieved with GIZ-R15.1.</p>	Limiting the establishment of trade supply retailing over a 200m ² threshold with a discretionary activity status will ensure that suitably narrow exceptions allow these activities to occur. The rule is currently too weak and will lead to cumulative effects, negating the purpose of the zone for industrial activities
GIZ-R17 Other activities not provided for	Oppose	<p>1. Activity status: Permitted Where: a. The activity is ancillary to a permitted activity.</p> <p>2. Activity status: Discretionary Where: a. Compliance is not achieved with GIZ-R17.1.</p>	<p>1. Activity status: Permitted Where: a. The activity is ancillary to a permitted activity. 1.2 Activity status: Discretionary Where: b. Compliance is not achieved with GIZ-R17.1.</p>	Given the number of permitted activities in the zone, the ancillary activities are too broad and open to abuse. The rule should be tightened and made discretionary to protect the intent of the zone being industrial activities.
GIZ-R18 Heavy Industrial Activities	Oppose	<p>1. <i>Activity status: Discretionary</i></p>	<p>1. <i>Activity status: Discretionary</i> Discretionary Restricted <i>Matters of discretion: GIZ-P3</i></p>	The proposed General Industrial zone is one of two zones available in the City for heavy industrial activities which include waste transfer stations and resource recovery parks. These activities should be enabled if they can minimise or contain their effects. As NZ moves towards a more circular economy more waste recovery facilities are likely and their establishment should be accepted with appropriate design to best industry standards for environmental compliance.
GIZ- R19 Residential activities	Support			The non-complying activity status and public notification is supported.
GIZ-R24 Servicing	Oppose	<p>1. <i>Activity status: Permitted</i> Where: a. The servicing is not within 40 metres of a site in a Residential Zone, Mixed Use</p>	<p>1. <i>Activity status: Permitted</i> Where: a. The servicing is not within 40 metres of a site in a Residential Zone, Mixed Use</p>	There should be no restrictions within the zone on the timing of heavy truck movement in the zone. Deliveries need to be made outside these hours to meet ferry schedules for example. The submitter considers the rule is better met by compliance with the noise controls are there are options available to reduce night time noise which include electric vehicles, noise barriers,etc.

		Zone, or Marae Zone, and is not within 40 metres of the notional boundary of an activity sensitive to noise in a Rural Zone, or b. The servicing occurs only between 7:00am and 10:00pm.	Zone, or Marae Zone, and is not within 40 metres of the notional boundary of an activity sensitive to noise in a Rural Zone, or b. The servicing occurs only between 7:00am and 10:00pm.	
GIZ-S4 Overlooking- adjoining zones		1. Windows in buildings that overlook an adjoining site in a Residential Zone, Rural Zone, Mixed Use Zone, Marae Zone, or Open Space and Recreation Zone, where the top of the window is more than 2 metres above ground level and the window is within 10 metres of the boundary, must use opaque privacy glazing.	1. Windows in buildings that overlook an adjoining site in a Residential Zone, Rural Zone, Mixed Use Zone, Marae Zone, or Open Space and Recreation Zone, where the top of the window is more than 2 metres above ground level and the window is within 10 metres of the boundary, must use opaque privacy glazing.	The rule is overly broad and restrictive with a 10m setback. Nor does it allow for the type of use that the room with the window has. If a lunchroom overlooking a park, is it not reasonable for the window to remain with clear glass for worker health?
HIZ- Heavy Industry Zone				
HIZ-O1 Purpose of the Zone	Support	The Heavy Industrial Zone is dedicated to meeting the needs of industrial and research activities and their supporting activities, particularly those activities that due to their adverse effects need to be separated from residential activities and other activities sensitive to industry . The Heavy Industrial Zone is recognised for its regionally significant role in providing for heavy industry.		Retain as notified.
HIZ-02 Activities in the zone	Support with amendments	The Heavy Industrial Zone: 1. Primarily provides for industrial activities and research activities , 2. Is supported by other activities that: a. Are compatible with the purpose, the planned character, and the planned urban environment of the zone, b. Support the industrial activities and research activities in the zone, including the needs of workers at those activities, and c. Do not create unreasonable reverse sensitivity effects that constrain the use of the Heavy Industrial Zone for heavy industrial activities , and 3. Provides for other activities that: a. Are compatible with the purpose, the planned character, and the planned urban environment of the zone, b. Have a functional or operational need to locate in the Heavy Industrial Zone, and c. Do not create unreasonable reverse sensitivity effects that constrain the use of the Heavy Industrial Zone for heavy industrial activities	The Heavy Industrial Zone: 1. Primarily provides for industrial activities and research activities , 2. Is supported by other activities that: a. Are compatible with the purpose, the planned character, and the planned urban environment of the zone, b. Support the industrial activities and research activities in the zone, including the needs of workers at those activities, and c. Do not create unreasonable reverse sensitivity effects that constrain the use of the Heavy Industrial Zone for heavy industrial activities , and 3. Provides for other activities that: a. Are compatible with the purpose, the planned character, and the planned urban environment of the zone, b. Have a functional or operational need to locate in the Heavy Industrial Zone, and c. Do not create unreasonable reverse sensitivity effects that constrain the use of the Heavy Industrial Zone for heavy industrial activities	Any reverse sensitivity effects can impact the operation of activities intended for this zone.
HIZ-03 Provision of Industrial Spaces	Support			Retain as notified

HIZ-04 Planned character and planned urban built environment of the zone	Support			Retain as notified
HIZ-P1 Enabled activities	Support			Retain as notified
HIZ-P2 Residential activities and other activities sensitive to industry	Support with amendments	Do not allow residential activities and other activities sensitive to industry unless: 1. They are ancillary to and critical to the functioning of an industrial activity , research activity , or emergency facility, which itself is an existing activity or has a functional or operational need to be located in the Heavy Industrial Zone, and 2. They are managed to avoid significant reverse sensitivity issues for industry, including heavy industry.	Do not allow residential activities and other activities sensitive to industry unless: 1. They are ancillary to and critical to the functioning of an industrial activity , research activity , or emergency facility, which itself is an existing activity or has a functional or operational need to be located in the Heavy Industrial Zone, and 2. They are managed designed to avoid significant reverse sensitivity issues for industry, including heavy industry.	Any reverse sensitivity effects can impact the operation of activities intended for this zone.
HIZ-P3 Other incompatible or potentially incompatible activities	Support with amendments	Do not allow residential activities and other activities sensitive to industry unless: 1. They are ancillary to and critical to the functioning of an industrial activity , research activity , or emergency facility, which itself is an existing activity or has a functional or operational need to be located in the Heavy Industrial Zone, and 2. They are managed to avoid significant reverse sensitivity issues for industry, including heavy industry.	Do not allow residential activities and other activities sensitive to industry unless: 1. They are ancillary to and critical to the functioning of an industrial activity , research activity , or emergency facility, which itself is an existing activity or has a functional or operational need to be located in the Heavy Industrial Zone, and 2. They are managed designed to avoid significant reverse sensitivity issues for industry, including heavy industry.	Any reverse sensitivity effects can impact the operation of activities intended for this zone.
HIZ-P4 Existing Activities	Support			Retain as notified
HIZ-P5 Role in network of commercial and industrial areas	Oppose	Recognise special circumstances where land uses may not be suitable in any other zone but are compatible with the intended purpose and character of the Heavy Industrial Zone.	Recognise special circumstances where land uses may not be suitable in any other zone but are compatible with the intended purpose and character of the Heavy Industrial Zone.	The rationale for this policy is questioned, with the submitter unsure of the types of commercial activities that may come under the policy. It would likely only apply to very few commercial activities and therefore should be deleted.
HIZ-P6	Support with amendments	Manage the scale and location of commercial activities to avoid negative impacts on the intended purpose, viability, vibrancy, and co-location benefits of centres in the City Centre Zone, Metropolitan Centre Zone, and Local Centre Zone.	Manage Restrict the scale and location of commercial activities to avoid negative impacts on the intended purpose, viability, vibrancy, and co-location benefits of centres in the City Centre Zone, Metropolitan Centre Zone, and Local Centre Zone.	The emphasis of the zone needs to be on industrial and research activities and therefore restricting rather than managing is more appropriate. This will also provide a stronger support for the commercial zones.
HIZ-P7 Development Capacity	Support			Retain as notified