

Further Submission on the Hutt City Proposed District Plan by Kāinga Ora – Homes and Communities

Clause 8 of Schedule 1 to the Resource Management Act 1991

To: Hutt City Council
Submission by email via: District.Plan@huttcity.govt.nz

Name of Further Submitter: Kāinga Ora – Homes and Communities

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

Reasons for further submission

4. The submissions that Kāinga Ora supports or opposes are set out in the table attached as **Appendix A** to this further submission.
5. The reasons for this further submission are:
 - (a) The reasons set out in the Kāinga Ora primary submission on the PDP.
 - (b) In the case of the Primary Submissions that are opposed:
 - (i) The Primary Submissions do not promote the sustainable management of natural and physical resources and are otherwise inconsistent with

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

DATED 24 July 2025

Kāinga Ora – Homes and Communities



Brendon Liggett

Manager – Development Planning

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Appendix A – Further Submission Table

Sub #	SP #	Submitter	Topic/chapter	Provision	Support/oppose	Requested Relief	Reason(s)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
173	5	Bunnings Ltd	FC - Financial Contributions	Entire chapter	Oppose	Seeks reconsideration of Financial Contributions chapter to reduce discretion and provide clearer guidance for council and developers.	Consider that the Financial Contributions chapter does not provide sufficient guidance as to how/when Financial Contributions would be required by Council. This leaves the discretion to Council and has the potential to disincentivise development.	Support	Kāinga Ora supports this point, in addition to the points raised in its primary submission.	Allow
174	7	McDonald's Restaurants (NZ) Limited	FC - Financial Contributions	Whole chapter	Oppose	Seeks that the FC chapter is reconsidered "to reduce discretion and provide clearer guidance for council and developers." (Refer to original submission)	Chapter does not provide sufficient guidance as to how/when Financial Contributions would be required by Council. Has potential to disincentivise development. Is in direct conflict with s108(10)(b) of the RMA as the level of contribution is not clearly determined in the PDP	Support	Kāinga Ora supports this point, in addition to the points raised in its primary submission.	Allow
251	5	Hutt Cycle Network	TR - Transport	TR-S2 (Provision of cycle parking and end of trip facilities)	Support in part	Amend as follows: "1. For all activities in new buildings and redevelopment of existing buildings which increases GFA by 10% or more: ... Matters of discretion if the standard is not met: 1. The availability of alternative, <u>functional</u> , accessible, safe, and secure cycle parking that meets the needs of the intended users. 2. If minimum rates cannot be met on site, cash developer contributions to council to fund public provision should be considered in the order of \$500 – \$1000 per bicycle parking space. ..."	Reasons given not specific to this relief, see original submission.	Oppose	Kāinga Ora considers that a cash developer contribution is inappropriate, especially in this chapter.	Disallow
283	1a	Ben Rumsey	HRZ - High Density Residential Zone	HRZ-O4 (Planned character and planned urban built environment of the High Density Residential Zone)	Oppose	Seeks that the wording of the objective reflects a limit to building heights of three stories (inferred - refer to original submission)	Impacts of 6 storey height in terms of shading, wind management, neighbourhood privacy, the urban environment. Is not necessary to achieve the stated goals. The proposed intensity is extreme when compared to the majority of the single story HRZ and not compatible with the alluvial soil / aquifer in the valley.	Oppose	Kāinga Ora supports the heights permitted within the HRZ and the location of the HRZ notified, as this is in line with the NPS-UD.	Disallow
283	1b	Ben Rumsey	HRZ - High Density Residential Zone	None specific	Oppose (requesting new provision)	Seeks that building heights in the High Density Residential Zone are limited to three stories	Impacts of 6 storey height in terms of shading, wind management, neighbourhood privacy, the urban environment. Is not necessary to achieve the stated goals. The proposed intensity is extreme when compared to the majority of the single story HRZ and not compatible with the alluvial soil / aquifer in the valley.	Oppose	Kāinga Ora supports the heights permitted within the HRZ and the location of the HRZ, as this is in line with the NPS-UD.	Disallow
302	03	Friends of Waiwhetū Stream	THW - Three Waters	New provisions	Amend	Seeks "that rainwater retention tanks be made compulsory for all new developments"	Considers that this would "manage non-potable water needs. These systems can capture and store rainwater for use in irrigation, landscape maintenance, and other nondrinking water applications, thereby reducing the demand on the potable water supply and alleviating pressure on the local water infrastructure. The integration of rainwater harvesting systems not only provides a sustainable water source for urban environments but also promotes water conservation practices, which are increasingly vital in light of the growing demand for water resources. Mandating the installation of rainwater retention tanks in all new developments will further reduce the environmental impact of urban growth while enhancing the resilience of our communities to future water challenges."	Oppose	Kāinga Ora opposes such a blanket requirement as this is not an efficient or effective means of implementing supply of water.	Disallow
303	13	Ron Beernink and Glenda McCallum	MRZ - Medium Density Residential Zone	New policy	Oppose (requesting new provision)	Add a policy that medium density house development shall not take place in areas where there is no existing & funded plan to address issues with poor water, wastewater or stormwater services	Medium density housing development cannot be undertaken where this will impact on existing poor water, wastewater or stormwater services	Oppose	Kāinga Ora considers that appropriate medium and high density zoning for demand is more effective than alternative zoning because of current infrastructure constraints. Infrastructure upgrades can then be appropriately planned for the MRZ and HRZ where there is demand. Council can decline developments through RC and BC process if there is no capacity or viable alternatives until bulk infrastructure is available.	Disallow
303	15	Ron Beernink and Glenda McCallum	HRZ - High Density Residential Zone	None specific	Oppose in part	Seeks that the District Plan is explicit in identifying that high density development is subject to capacity of three waters infrastructure, and that areas suitable for high density development are identified with regard to these constraints (inferred) - refer to original submission	It makes sense to have high density development close to the CBD and public transport, where this is not impacted by or does not impact on water, wastewater or stormwater services. It is not clear what is meant by the Petone metropolitan centre and some suburban centres.	Oppose	Kāinga Ora considers that appropriate medium and high density zoning for demand is more effective than alternative zoning because of current infrastructure constraints. Infrastructure upgrades can then be appropriately planned for the MRZ and HRZ where there is demand. Council can decline developments through RC and BC process if there is no capacity or viable alternatives until bulk infrastructure is available.	Disallow

303	20a	Ron Beernink and Glenda McCallum	HRZ - High Density Residential Zone	HRZ-51 (Number of residential units per site)	Oppose in part	Seeks that matter or discretion is more directive that development cannot occur where three waters infrastructure capacity is not available (inferred - refer to original submission)	It is not clear what is meant by "Matters of discretion". In particular for item 2, high density housing development cannot be undertaken where this will impact on the capacity of the existing poor water, wastewater or stormwater services. This is not a matter of discretion.	Oppose	Kāinga Ora considers that appropriate medium and high density zoning for demand is more effective than alternative zoning because of current infrastructure constraints. Infrastructure upgrades can then be appropriately planned for the MRZ and HRZ where there is demand. Council can decline developments through RC and BC process if there is no capacity or viable alternatives until bulk infrastructure is available.	Disallow
303	20b	Ron Beernink and Glenda McCallum	HRZ - High Density Residential Zone	New policy	Oppose (requesting new provision)	Add a policy that high density house development shall not take place in areas where there is no existing & funded plan to address issues with poor water, wastewater or stormwater services	high density housing development cannot be undertaken where this will impact on the capacity of the existing poor water, wastewater or stormwater services.	Oppose	Kāinga Ora considers that appropriate medium and high density zoning for demand is more effective than alternative zoning because of current infrastructure constraints. Infrastructure upgrades can then be appropriately planned for the MRZ and HRZ where there is demand. Council can decline developments through RC and BC process if there is no capacity or viable alternatives until bulk infrastructure is available.	Disallow
303	21	Ron Beernink and Glenda McCallum	HRZ - High Density Residential Zone	HRZ-57 (Permeable surface)	Support in part	Seeks that clause 1 of policy is amended to increase the minimum threshold for taller buildings, e.g 10% increase per level (over 2 levels)	The minimum permeable surface area of a sit should not just reflect the ground size but also the height of the development.	Oppose	Kāinga Ora does not see this rule as being functional and notes that permeable surface does not increase as the height of a building increases.	Disallow
311	11	Connexa, Chorus, FortySouth and Spark	Definitions	Reverse sensitivity	Oppose in part	Amend to replace the definition with the following: "means the vulnerability of an existing lawfully established activity, to other activities in the vicinity which are sensitive to adverse environmental effects, may be generated by such existing activity, thereby creating the potential for the operation of such existing activity to be constrained."	Reverse sensitivity is a well understood planning term, and can be defined much more succinctly that has been proposed. This is the case in other recent district plans, such as Wellington and Porirua, and regional consistency on the matter should be sought.	Oppose in part	Kāinga Ora does not support the drafted wording of the proposed definition as it is not clear and could be simplified.	Disallow
314	19	Laura Skilton	CE - Coastal Environment (Hazards)	Coastal Inundation Hazard Overlay Tsunami Hazard Overlay	Neutral	Seeks that the Coastal Inundation Hazard Overlay and the Tsunami Hazard Overlay are merged as follows, with the most restrictive rules applying in each area: - Medium Coastal Hazard Overlay (Low and Medium Tsunami Hazard Overlay and Medium Coastal Inundation Hazard Overlay) - High Coastal Hazard Overlay (High Tsunami Hazard Overlay and High Coastal Inundation Hazard Overlay)	To assist interpretation of plan users. Refer to original submission for full reasons.	Oppose	Kāinga Ora opposes the relief sought as the layers provide for different levels/probabilities/effect of risk.	Disallow
314	24	Laura Skilton	CE - Coastal Environment (Hazards)	CE-P14 (Additions to existing buildings and structures within the Coastal Hazard Overlays)	Oppose in part	Amend policy as follows: "Additions to existing buildings and structures in the Coastal Hazard Overlays are managed as follows: ... 2. Allow for additions to existing buildings and structures containing activities potentially sensitive to natural hazards and activities most sensitive to natural hazards in the Low Tsunami Hazard Overlay. 3. Provide for additions to existing buildings and structures containing activities potentially sensitive to natural hazards or activities most sensitive to natural hazards in the Medium Coastal Hazard Overlays and High Coastal Hazard Overlays where: ... d. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture by means of walking. 4. Provide for additions to existing buildings and structures containing activities potentially sensitive to natural hazards in the High Coastal Hazard Overlays where: a. The addition enables the continued use of the existing building. b. The addition incorporates measures that reduce or do not increase the risk to people and buildings from coastal inundation from sea level rise, and c. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the	Objectives and Rules are not strong enough to ensure lives are not endangered in the Coastal Hazard Overlays All the Low Tsunami Overlay areas are within the Medium Coastal Overlay, therefore point 2 is redundant.	Oppose	Kāinga Ora opposes the relief sought as there are appropriate mitigation measures for such activities and therefore Kāinga Ora supports the notified provisions.	Disallow

314	25	Laura Skilton	CE - Coastal Environment (Hazards)	CE-P15 (Subdivision, Use and Development within the Coastal Hazard Overlays)	Oppose in part	Amend policy as follows: "Subdivision, use and development in the Coastal Hazard Overlay are managed as follows: ... 3. Allow for new buildings and structures and building platforms containing activities potentially sensitive to natural hazards in the Low Tsunami Hazard Overlay. 4. Provide for new buildings and structures and building platforms containing activities potentially sensitive to natural hazards and activities most sensitive to natural hazards in the Medium and High Coastal Hazard Overlays when located in the General Industrial Zone in Seaview, the Heavy Industrial Zone in Seaview, the Metropolitan Centre Zone in Petone and the Seaview Marina Zone where: ... d. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the tsunami arrives within 30 minutes of fault rupture by means of walking, and ... 5. Provide for new buildings and structures and building platforms containing activities potentially sensitive to natural hazards in the Medium Coastal Hazard Overlays in all other zones where: ... b. There is the ability to access safe pedestrian evacuation routes for occupants of the building from tsunami hazards, assuming the	Objectives and Rules are not strong enough to ensure lives are not endangered in the Coastal Hazard Overlays. All the Low Tsunami Overlay areas are within the Medium Coastal Overlay, therefore CE-P15.3 and CE-P15.7 is redundant.	Oppose	Kāinga Ora opposes the relief sought as there are appropriate mitigation measures for such activities and therefore Kāinga Ora supports the notified provisions.	Disallow
314	27	Laura Skilton	CE - Coastal Environment (Hazards)	CE-R10 (Additions to existing buildings and structures for activities potentially sensitive to natural hazards and activities most sensitive to natural hazards in the Medium Coastal Hazard Overlays)	Oppose	Amend rule title as follows: "CE-R10: Additions to existing buildings and structures for activities potentially sensitive to natural hazards and activities most sensitive to natural hazards in the Medium Coastal Hazard Overlay"	There should be no additions to buildings for activities most sensitive to natural hazards.	Oppose	Kāinga Ora opposes the relief sought as there are appropriate mitigation measures for such activities and therefore Kāinga Ora supports the notified provisions.	Disallow
314	28	Laura Skilton	CE - Coastal Environment (Hazards)	New Provision	Oppose (requesting new provision)	Add new rule for "Additions to existing buildings and structures for activities most sensitive to natural hazards in the Medium Coastal Hazard Overlays", and apply a Prohibited activity status	There should be no additions to buildings for activities most sensitive to natural hazards.	Oppose	Kāinga Ora opposes the relief sought as there are appropriate mitigation measures for such activities and therefore Kāinga Ora supports the notified provisions.	Disallow
314	29	Laura Skilton	CE - Coastal Environment (Hazards)	CE-R12 (Additions to existing buildings and structures for activities most sensitive to natural hazards in the High Coastal Hazard Overlays)	Oppose	Amend rule as follows: "1. Activity status: Discretionary Prohibited"	There should be no additions to buildings for activities most sensitive to natural hazards.	Oppose	Kāinga Ora opposes the relief sought as there are appropriate mitigation measures for such activities and therefore Kāinga Ora supports the notified provisions.	Disallow
314	31	Laura Skilton	CE - Coastal Environment (Hazards)	CE-16 (New buildings and structures and the conversion of existing buildings for activities most sensitive to natural hazards in the Coastal Hazard Overlays)	Oppose	Amend rule as follows: "1. Activity status: Permitted Where: a. The new building or structure or conversion of an existing building is located in a Low Tsunami Hazard Overlay, and b. The new building is not for a childcare service, retirement village, educational facility, hospital, emergency service facility or healthcare facility, and c. The number of residential units on a site is no more than three, new buildings replace an existing building and has the same or less footprint than building that was on the site on 31 December 2024. 2. Activity status: Restricted discretionary Prohibited Where: The new building or structure or conversion of an existing building is located in a Low Tsunami Hazard Overlay, and Compliance is not achieved with CE-R16.1. 3. Activity status: Discretionary Where: a. The new building or structure or conversion of an existing building is located in a Medium Coastal Hazard Overlay. 6. Activity status: Non-complying Where: The new building or structure or conversion of an existing building is located in a High Coastal Hazard Overlay.	There should be no new buildings for activities most sensitive to natural hazards. If CE-16.2 is updated as requested, CE-16.5 and CE-R16.6 are not needed. All the Low Tsunami Overlay areas are within the Medium Coastal Overlay, therefore CE-R16.1a is redundant.	Oppose	Kāinga Ora opposes the relief sought as there are appropriate mitigation measures for such activities and therefore Kāinga Ora supports the notified provisions.	Disallow
314	34a	Laura Skilton	HRZ - High Density Residential Zone	HRZ-R3 (Construction of new buildings and structures and alterations and additions to existing buildings and structures)	Oppose	Amend clause (2) of rule as follows: "2. Activity status: Restricted discretionary Prohibited Where: Compliance is not achieved with HRZ-R3.1."	Effects on adjacent sites are already adverse with existing rules, so these should never be breached.	Oppose	Kāinga Ora considers that an RDIS framework is appropriate. A prohibited activity status is not an efficient or effective approach to development.	Disallow
314	34b	Laura Skilton	MRZ - Medium Density Residential Zone	MRZ-R3 (Construction of new buildings and structures and alterations and additions to existing buildings and structures)	Oppose	Amend clause (2) of rule as follows: "2. Activity status: Restricted discretionary Prohibited Where: Compliance is not achieved with MRZ-R3.1."	Effects on adjacent sites are already adverse with existing rules, so these should never be breached.	Oppose	Kāinga Ora considers that an RDIS framework is appropriate. A prohibited activity status is not an efficient or effective approach to development.	Disallow
314	35a	Laura Skilton	HRZ - High Density Residential Zone	HRZ-R4 (Residential activities)	Oppose	Amend clause (2) of the rule as follows: "2. Activity status: Restricted discretionary Prohibited"	Effects on adjacent sites are already adverse with existing rules, so these should never be breached.	Oppose	Kāinga Ora considers that an RDIS framework is appropriate. A prohibited activity status is not an efficient or effective approach to development.	Disallow
314	35b	Laura Skilton	MRZ - Medium Density Residential Zone	MRZ-R4 (Residential activities)	Oppose	Amend clause (2) of the rule as follows: "2. Activity status: Restricted discretionary Prohibited"	Effects on adjacent sites are already adverse with existing rules, so these should never be breached.	Oppose	Kāinga Ora considers that an RDIS framework is appropriate. A prohibited activity status is not an efficient or effective approach to development.	Disallow
314	36a	Laura Skilton	HRZ - High Density Residential Zone	HRZ-R5 (Papakāinga)	Neutral	Amend rule title as follows: "HRZ-R5: Papakāinga (housing and ancillary activities for tangata whenua on their ancestral land)"	Ease of use for printed versions	Oppose	Kāinga Ora considers that an RDIS framework is appropriate. A prohibited activity status is not an efficient or effective approach to development.	Disallow

314	41a	Laura Skilton	HRZ - High Density Residential Zone	HRZ-R9 (Supported residential care facility)	Oppose	Amend rule as follows: "1. Activity status: Permitted Where: a. The maximum number of people accommodated at the supported residential care facility, including staff and residents, does not exceed <u>five 40</u> . 2. Activity status: Restricted-Discretionary "	Rules not strict enough and conflict with Transport policies.	Oppose	Kāinga Ora considers that up to ten persons is an appropriate number of people suited to a residential environment.	Disallow
314	41b	Laura Skilton	MRZ - Medium Density Residential Zone	MRZ-R9 (Supported residential care facility)	Oppose	Amend rule as follows: "1. Activity status: Permitted Where: a. The maximum number of people accommodated at the supported residential care facility, including staff and residents, does not exceed <u>five 40</u> . 2. Activity status: Restricted-Discretionary "	Rules not strict enough and conflict with Transport policies.	Oppose	Kāinga Ora considers that up to ten persons is an appropriate number of people suited to a residential environment.	Disallow
314	48a	Laura Skilton	HRZ - High Density Residential Zone	HRZ-S2 (Building coverage)	Oppose	Amend clause (2) of the standard as follows: "2. Does not apply to: a. Decks less than 500mm in height. b. All structures less than 1.2 metres in height, and c. Any scaffolding or falsework erected temporarily for construction or maintenance purposes."	Decks should be included as (a) they are often covered and (b) they are often covered at a later date. This effectively increases the roof area. Refer also to my concerns about permeable surfaces.	Oppose	This submission point is redundant given that a roof covering a deck would be considered as part of coverage and if 'added at a later date' would be subject to the rules then.	Disallow
314	48b	Laura Skilton	MRZ - Medium Density Residential Zone	MRZ-S2 (Building coverage)	Oppose	Amend clause (2) of the standard as follows: "2. Does not apply to: a. Decks less than 500mm in height. b. All structures less than 1.2 metres in height, and c. Any scaffolding or falsework erected temporarily for construction or maintenance purposes."	Decks should be included as (a) they are often covered and (b) they are often covered at a later date. This effectively increases the roof area. Refer also to my concerns about permeable surfaces.	Oppose	This submission point is redundant given that a roof covering a deck would be considered as part of coverage and if 'added at a later date' would be subject to the rules then.	Disallow
314	49b	Laura Skilton	MRZ - Medium Density Residential Zone	MRZ-S4 (Height in relation to boundary)	Oppose	Requested relief unclear - amendments do not relate to MRZ-S4 as notified	Conflict with MRZ-S1. Effects on adjacent sites are already adverse with existing rules, without increasing them for 4 units. The height plans should not be increased when there are 4 or more units.	Oppose	The road separation (no matter what width), provides adequate separation.	Disallow
314	50a	Laura Skilton	HRZ - High Density Residential Zone	HRZ-S4 (Height in relation to boundary)	Oppose	Amend clause (4) of the standard as follows: "4. 1, 2 and 3 do not apply to: a. A boundary with a road <u>if the road reserve is more than 12m wide</u> ."	Sunlight planes will affect houses on the opposite side of the road if the road reserve is narrow.	Oppose	The road separation (no matter what width), provides adequate separation.	Disallow
314	50b	Laura Skilton	MRZ - Medium Density Residential Zone	MRZ-S4 (Height in relation to boundary)	Oppose	Amend clause (4) of the standard as follows: "4. 1, 2 and 3 do not apply to: a. A boundary with a road <u>if the road reserve is more than 12m wide</u> ."	Sunlight planes will affect houses on the opposite side of the road if the road reserve is narrow.	Oppose	The road separation (no matter what width), provides adequate separation.	Disallow
314	52a	Laura Skilton	HRZ - High Density Residential Zone	HRZ-S7 (Permeable surface)	Oppose	Seeks that standard is amended to delete matters of discretion, and if the standard is breached it is a Prohibited activity	Effects on stormwater system in large rain event, refer to original submission	Oppose	Kāinga Ora considers that an RDIS framework is appropriate. A prohibited activity status is not an efficient or effective approach to development.	Disallow
314	52b	Laura Skilton	MRZ - Medium Density Residential Zone	MRZ-S7 (Permeable surface)	Oppose	Seeks that standard is amended to delete matters of discretion, and if the standard is breached it is a Prohibited activity	Effects on stormwater system in large rain event, refer to original submission	Oppose	Kāinga Ora considers that an RDIS framework is appropriate. A prohibited activity status is not an efficient or effective approach to development.	Disallow
314	53a	Laura Skilton	HRZ - High Density Residential Zone	HRZ-S8 (Outdoor living space)	Oppose	Amend standard as follows: "1. A residential unit at ground floor level must have an outdoor living space that is at least 20 square metres and that comprises ground floor, balcony, patio, <u>and/or</u> roof terrace space that 2. A residential unit located above ground floor level must have an outdoor living space in the form of a balcony, patio, <u>and/or</u> roof terrace that: a. Is at least 8 square metres and has a minimum dimension of 1.8 metres, b. Is accessible from the residential unit, c. May be: i. Grouped cumulatively by area in 1 communally-accessible location, in which case it may be located at ground level, or ii. Located directly adjacent to the unit."	Implies that a unit above ground can have no balcony, patio or roof terrace	Oppose	Kāinga Ora considers that communal open space is an adequate option for outdoor living space. Kāinga Ora considers that the notified provisions provide adequate outdoor living space. Further, the proposed reduces choice of such space.	Disallow
314	53b	Laura Skilton	MRZ - Medium Density Residential Zone	MRZ-S8 (Outdoor living space)	Oppose	Amend standard as follows: "1. A residential unit at ground floor level must have an outdoor living space that is at least 20 square metres and that comprises ground floor, balcony, patio, <u>and/or</u> roof terrace space that 2. A residential unit located above ground floor level must have an outdoor living space in the form of a balcony, patio, <u>and/or</u> roof terrace that: a. Is at least 8 square metres and has a minimum dimension of 1.8 metres, b. Is accessible from the residential unit, c. May be: i. Grouped cumulatively by area in 1 communally-accessible location, in which case it may be located at ground level, or ii. Located directly adjacent to the unit."	Implies that a unit above ground can have no balcony, patio or roof terrace	Oppose	Kāinga Ora considers that communal open space is an adequate option for outdoor living space. Kāinga Ora considers that the notified provisions provide adequate outdoor living space. Further, the proposed reduces choice of such space.	Disallow
314	54a	Laura Skilton	HRZ - High Density Residential Zone	HRZ-S9 (Outlook space)	Oppose	Amend standard to add a new clause: "Outlook space for residential units on adjacent sites must be maintained to a provide the minimum depth as shown in the diagram HRZ-Figure 3 for all windows on the adjacent site."	Effects on adjacent sites not adequately catered for.	Oppose	Requiring the need to understand living spaces of adjacent dwellings to comply with this submission relief is not considered appropriate. In addition, needing to comply with a neighbouring site's outlook space is not an efficient or effective use of plan provisions.	Disallow

314	54b	Laura Skilton	MRZ - Medium Density Residential Zone	MRZ-S9 (Outlook space)	Oppose	Amend standard to add a new clause: "Outlook space for residential units on adjacent sites must be maintained to a provide the minimum depth as shown in the diagram HRZ-Figure 3 for all windows on the adjacent site."	Effects on adjacent sites not adequately catered for.	Oppose	Requiring the need to understand living spaces of adjacent dwellings to comply with this submission relief is not considered appropriate. In addition, needing to comply with a neighbouring site's outlook space is not an efficient or effective use of plan provisions.	Disallow
314	55a	Laura Skilton	HRZ - High Density Residential Zone	HRZ-S9 (Outlook space)	Oppose	Amend clause (2) of the standard as follows: "2. The minimum dimensions for a required outlook space are: ... b. All other habitable rooms must have an outlook space with a minimum dimension of 3m 2m deep and 1m wide." Requested relief includes amendments to HRZ-Figure 3 (Outlook space), refer to original submission for details	As there are 1m setbacks, this change should not change anything but will strengthen the requirement for outlook space.	Oppose	Kāinga Ora supports the notified provisions.	Disallow
314	55b	Laura Skilton	MRZ - Medium Density Residential Zone	MRZ-S9 (Outlook space)	Oppose	Amend clause (2) of the standard as follows: "2. The minimum dimensions for a required outlook space are: ... b. All other habitable rooms must have an outlook space with a minimum dimension of 3m 2m deep and 1m wide." Requested relief includes amendments to HRZ-Figure 3 (Outlook space), refer to original submission for details	As there are 1m setbacks, this change should not change anything but will strengthen the requirement for outlook space.	Oppose	Kāinga Ora supports the notified provisions.	Disallow
314	66	Laura Skilton	TR - Transport	TR-R4 (Activities within the Highly Constrained Roads Overlay)	Support in part	Amend rule as follows: "1. Activity status: Permitted Where: a. It is a residential activity and no more than one residential unit occupies the site, and there is no increase in the number of bedrooms or rooms that can accommodate additional people on the site on 31 December 2024, or b. It is a non-residential activity and is ancillary to an existing on-site activity. 2. Activity status: Non-complying Prohibited Where: Compliance is not achieved with TR-R4.1."	Rule TR-R4 needs to be strengthened.	Oppose	Kāinga Ora does not support a prohibited activity status for infringements to standards. This is not an efficient or effective way to implement a District Plan.	Disallow
314	76	Laura Skilton	SUB - Subdivision	SUB-R18 (Subdivision within the Medium Coastal Inundation Hazard Overlay and Medium Tsunami Hazard Overlay)	Oppose	Amend clause (4) of rule as follows: "4. Activity status: Discretionary Non-complying"	Standards for Activities Most Sensitive to Natural Hazard too low.	Oppose	Kāinga Ora supports the notified activity status.	Disallow
314	77	Laura Skilton	SUB - Subdivision	SUB-R19 (Subdivision within the High Coastal Inundation Hazard Overlay or High Tsunami Hazard Overlay)	Oppose	Amend clause (3) of rule as follows: "3. Activity status: Non-complying Prohibited"	Standards for Activities Most Sensitive to Natural Hazard too low.	Oppose	Kāinga Ora does not support a prohibited activity status for infringements to standards. This is not an efficient or effective way to implement a District Plan.	Disallow
314	78	Laura Skilton	SUB - Subdivision	SUB-R23 (Subdivision of land in the Highly Constrained Roads Overlay)	Oppose	Amend rule as follows: "1. Activity status: Discretionary Prohibited"	Standards for Highly Constrained Roads too low. Consistent with TR-R4.	Oppose	Kāinga Ora does not support a prohibited activity status for infringements to standards. This is not an efficient or effective way to implement a District Plan.	Disallow
322	2	Urban Plus Limited	MUZ - Mixed Use Zone	Introduction	Support in part	Amend to include the following suggested wording in the introduction of the Mixed Use Zone: <u>The planned urban environment for the Mixed Use Zone is for a mix of residential and non-residential activity, including commercial, community, light industrial, recreational and residential activity and other compatible activity. The combination and/or predominance of particular activities may vary significantly, from place to place and over time, in response to market and community demand.</u> <u>Commercial, community and light industrial activities shall be of a small or specialised nature, or that primarily serve their immediate surroundings so as not to undermine the role of commercial centres in the City Centre Zone, Metropolitan Centre Zone, or Local Centre Zone. The Mixed Use Zone is not expected to be managed to support the role of the Neighbourhood Centre Zone. Significant vehicle-oriented businesses are not encouraged.</u> <u>Residential activity may be of medium or high density and may encompass a range of dwelling typologies and forms.</u> <u>While the planned urban environment is for smaller scale non-residential activity, and residential activity of varying density, a permissive framework for built development is proposed to ensure efficient use of land to accommodate a mix of activities within a site, and to facilitate multiple smaller tenancies within a single</u>	Stated aims of the zone are internally inconsistent. It is unclear why the size of activities is controlled, but there is no equivalent control on the size of buildings. No clarity around the planned urban built environment or character of the zone (refer to original submission for full reasons).	Support	Subject to the Kāinga Ora submission, Kāinga Ora supports the proposed changes as they better describe the intent of the MUZ.	Allow
322	3	Urban Plus Limited	MUZ - Mixed Use Zone	Introduction	Oppose	Seeks inclusion of reference to 'light industrial activity' within zone introduction.	Without this reference, the introduction is not well aligned with the zone intention as prescribed by the National Planning Standards.	Support	Subject to the Kāinga Ora submission, Kāinga Ora supports the proposed changes as they better describe the intent of the MUZ.	Allow
322	6	Urban Plus Limited	MUZ - Mixed Use Zone	MUZ-O1 (Purpose of the zone)	Oppose	Amend MUZ-O1 (Purpose of the zone) as follows: The Mixed Use Zone contributes to a well-functioning urban environment through the provision of areas that can flexibly adapt to a range of mixed urban uses over time, in locations that are appropriate for medium- or high-density residential and commercial development. The Mixed Use Zone contributes to a well-functioning urban environment by accommodating a mix of residential and non-residential uses that support the social, economic, and cultural wellbeing of people and communities in the surrounding area.	Considers that the purpose is unclear and seemingly is to provide for adaptation. Considers that is not a definable, on-the-ground outcome that can be relied upon to inform development design or resource consent assessment.	Support	Subject to the Kāinga Ora submission, Kāinga Ora supports the proposed changes as they better describe the intent of the MUZ.	Allow

322	7	Urban Plus Limited	MUZ - Mixed Use Zone	MUZ-O2 (Activities in the zone)	Support in part	Amend MUZ-O2 (Activities in the zone) as follows: The Mixed Use Zone: 1. Does not have a single predominant use that it provides for; 2. is expected to provide flexibility for any combination of commercial, community, light manufacturing and servicing, recreational, residential, and other compatible activities, while reflecting the Mixed Use Zone's role and function in relation to the hierarchy of centres; 3. Provides for other activities that: a. Are compatible with the purpose, planned character, and the planned urban built environment of the zone; b. Are compatible with the types of amenity associated with a medium or high density mixed use environment anticipated by the zone, and c. Support the health and wellbeing of people and communities in the surrounding area; 4. is not intended to provide for: a. Large-scale vehicle-oriented activities; or b. Activities that would be a significant city-wide or regional destination; and 5. Otherwise avoids other activities that are likely to be incompatible. The Mixed Use Zone provides flexibility for any combination of commercial, community, light manufacturing and servicing, recreational, residential, and other compatible activities, while	The objective reads as a policy and should be reworded for clarity. The points detailed at 1, 3, 4 and 5 could be integrated into the relevant policies if required.	Support	Subject to the Kāinga Ora submission, Kāinga Ora agrees that the objective reads as a policy and should be simplified and more succinct.	Allow
322	9a	Urban Plus Limited	MUZ - Mixed Use Zone	MUZ-O4 (Planned character and planned urban built environment of the zone)	Support in part	Amend MUZ-O4 (Planned character and planned urban built environment of the zone) as follows: Built development or open spaces are consistent with a mixed-use residential, commercial, and community area within a well-functioning urban environment that: 1. Comprises buildings and spaces surrounding buildings, sites, streets, and neighbourhoods that are designed to achieve the desired urban design outcomes for the zone; 2. Has an urban built environment that is characterised by flexibility of building densities and forms; 3. Takes advantage of and contributes positively to the opportunities of the pedestrian spaces and adjoining parks and reserves; 4. is healthy, safe, attractive, and accessible; 5. Provides useful on-site outdoor living areas for residents, or is located in close proximity to useful public open space in the neighbourhood; 6. Has good access to and from surrounding neighbourhoods, and to and from commercial centres, through active and public transport modes, providing for well-connected and low emission communities; 7. is integrated with existing and planned infrastructure; and 8. Provides for activities with co-location benefits in the area. The character and urban built form of the Mixed Use Zone is of a scale and quality that is compatible with the amenity level of	Objective reads as a policy and should be simplified. Considers some matters listed in the objective should be addressed through the relevant policies (refer to original submission for full reasons).	Support	Subject to the Kāinga Ora submission, Kāinga Ora agrees that the objective reads as a policy and should be simplified and more succinct.	Allow
322	9b	Urban Plus Limited	MUZ - Mixed Use Zone	MUZ-O4 (Planned character and planned urban built environment of the zone)	Support in part	Seeks that the details of MUZ-O4 be moved to the relevant policies.	Objective reads as a policy and should be simplified. Considers some matters listed in the objective should be addressed through the relevant policies (refer to original submission for full reasons).	Support	Subject to the Kāinga Ora submission, Kāinga Ora agrees that the objective reads as a policy and should be simplified and more succinct.	Allow
322	37	Urban Plus Limited	Maps - Zoning / Commercial and Industrial	Local Centre Zoning (308-310 Waiwhetū Road)	Oppose	Rezone 308-310 Waiwhetū Road as a Mixed Use Zone.	The Mixed Use Zone and the outcomes it seeks to achieve are more appropriate for the subject site. The site is physically separated from any other proposed LCZ land. Mixed Use Zoning would be consistent with adjacent zoning. Rules of the Mixed Use Zone are well aligned with activities already occurring on the site. Mixed Use Zoning would be well aligned with and provide for the future development goals and ambitions for the site (see original submission for full reasons).	Support	In line with the Kāinga Ora submission, Kāinga Ora supports rezoning of the site to MUZ.	Allow
322	38	Urban Plus Limited	Maps - Other	Active Street Frontage Overlay (308-310 Waiwhetū Road)	Oppose	Remove Active Frontage Overlay from 308-310 Waiwhetū Road.	Overlay not considered appropriate to the site. Overlay will not result in creation of a continuous, sheltered frontage. Overlay could result in inconsistent built form within the site. Additional restrictions on the site for limited public benefit. Should the site be rezoned to Mixed Use Zone, the overlay would be inconsistent with this (see original submission for full reasons).	Support	In line with the Kāinga Ora submission, Kāinga Ora opposes the Active Frontage Overlay for 308-310 Waiwhetū Road.	Allow
323	016	Enviro NZ	Definitions	Reverse sensitivity	Oppose	Not explicitly stated, but inferred as either delete definition or replace with <u>"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."</u>	Considers that "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...", considers a simpler definition would be that in the Christchurch District Plan.	Oppose in part	Kāinga Ora does not support the drafted wording and opposes inclusion of 'intensification of existing activities' within the definition.	Disallow
326	26a	Summerset Group Holdings Limited	NH - Natural Hazards	NH1-O1, NH-P2, NH-P9	Oppose in part	Seeks amendments to provide for an appropriate consenting pathway for areas where small isolated pockets of High Flood Hazard are located interspersed among larger areas of Low and Medium Flood Hazard.	Objectives and policies are framed in avoid terms in areas where small pockets of High Flood Hazard are located within larger areas of Low and Medium Hazard, the impact of the High Flood Hazard are disproportionate.	Oppose	Kāinga Ora considers that the exceptions are not required in this instance.	Disallow

341	3	New Zealand Pork Industry Board	Definitions	Reverse sensitivity	Oppose	Replace definition of reverse sensitivity: <u>"Reverse sensitivity: means the potential for the operation of an existing lawfully established activity to be compromised, constrained, or curtailed by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived, adverse environmental effects generated by an existing activity."</u>	Definition of reverse sensitivity, as notified, is overly prescriptive and reads more as a list of when reverse sensitivity can occur, rather than defining what reverse sensitivity actually is. The list provided in the definition could be useful for non-statutory material to guide plan interpretation with issues of reverse sensitivity.	Oppose	Kāinga Ora opposes the use of 'alteration and perceived' within the definition.	Disallow
375	3	Fiona Christeller	HRZ - High Density Residential Zone	Entire Chapter	Oppose (requesting new provision)	Seeks a combined medium and high density residential design guide and: i. Make the design guide a statutory part of the District Plan rather than an optional extra. ii. Make compliance with the design guide a requirement for all projects which require a resource consent process. iii. Adopt the Wellington City Council Design Guides suite, which would then simplify compliance across Territorial Authority boundaries. iv. Undertake an active publicity campaign to inform and encourage all developers and designers to use the design guide as an aide memoir to create adaptable and live-able housing groups.	Most effective way to achieve a positive urban environment. (Refer to original submission for full reasons)	Oppose	Kāinga Ora considers that design guides should sit outside the district plan as non statutory.	Disallow
375	4	Fiona Christeller	MRZ - Medium Density Residential Zone	Entire Chapter	Oppose (requesting new provision)	Seeks a combined medium and high density residential design guide and: i. Make the design guide a statutory part of the District Plan rather than an optional extra. ii. Make compliance with the design guide a requirement for all projects which require a resource consent process. iii. Adopt the Wellington City Council Design Guides suite, which would then simplify compliance across Territorial Authority boundaries. iv. Undertake an active publicity campaign to inform and encourage all developers and designers to use the design guide as an aide memoir to create adaptable and live-able housing groups.	Most effective way to achieve a positive urban environment. (Refer to original submission for full reasons)	Oppose	Kāinga Ora considers that design guides should sit outside the district plan as non statutory.	Disallow
385	1	NZ Transport Agency Waka Kotahi	Definitions	New definition - Access	Oppose (requesting new provision)	Add definition of "Access": <u>"Means an area of land over which vehicle, pedestrian and/or cycling access is obtained to legal road. It includes: a. an access strip; b. an access allotment; and c. a right-of-way."</u>	There is currently no definition in the plan for access, despite is being a term used throughout the District Plan. Given the frequency of use in the Plan the term should be defined.	Support	Kāinga Ora supports this definition to provide clarity.	Allow
385	2	NZ Transport Agency Waka Kotahi	Definitions	New definition - Accessway	Oppose (requesting new provision)	Add definition of "Accessway": <u>"Means any area or part of private land where the primary purpose is to provide access, including vehicle access, between the body of any allotment(s) or site(s) and any public road, footpath, or cycling path. Accessway includes any rights of way, private way, access lot, access leg, or private road."</u>	There is currently no definition in the plan for accessway, despite is being a term used throughout the District Plan. Given the frequency of use in the Plan the term should be defined.	Support	Kāinga Ora supports this definition to provide clarity.	Allow
385	17	NZ Transport Agency Waka Kotahi	Definitions	Reverse sensitivity	Support in part	Amend to replace the definition with the following: <u>"means the potential for the development, upgrading, operation and maintenance of an existing lawfully established activity to be compromised, constrained or curtailed by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived environmental effects generated by an existing activity."</u>	Considers as drafted is overly complex and will confuse Plan users. Refer to original submission for full reasons.	Oppose in part	Kāinga Ora opposes the inclusion of 'perceived, development and upgrading' to the definition. Upgrades could have an effect beyond the existing activity which could have an adverse effect on nearby sensitive activities.	Disallow
385	61	NZ Transport Agency Waka Kotahi	SUB - Subdivision	SUB-P7 (Servicing and access)	Support in part	Amend the notified policy as follows: "Require all allotments created by any subdivision to be adequately serviced as follows: ... d. Avoid effects being generated on the operation of the existing road network."	To provide further clarification that new roads and new vehicle access need to be designed in such a manner that they do not compromise the operation of the surrounding road network.	Oppose	Kāinga Ora opposes the relief sought, particularly the use of the word 'avoid' as there are appropriate mitigation measures for effects on the existing road network and therefore Kāinga Ora supports the notified provisions.	Disallow
385	97	NZ Transport Agency Waka Kotahi	Maps - Zoning / Moves between categories	All zones	Support	Retain the zones as mapped	It is important that land use planning throughout the Hutt Valley is undertaken in a coherent manner which is influenced by the underlying zoning and associated rules.	Support	Kāinga Ora supports the notified zones as mapped to the extent that it is consistent with its primary submission.	Allow
452	189c	Wellington Regional Council	Residential Zones	All zones	Amend	Seeks to add new objectives, policies, rules and standards, or add these to each zone tailored to the context of the specific zone, and/or include these in a different section of the DP as appropriate, to the following effect: <u>Policy X: Ensure that subdivision and/or development achieves the following tree canopy cover levels at maturity: i. For residential subdivision and/or development: 20% of the net site area; ii. For residential greenfield and brownfield subdivision and/or development – as for (i), and an additional 15% of the future road area to be vested in Council.</u>	Considers there is a gap in the proposed HDP to provide for Policy CC.4 clause (a) in relation to urban heat (and stormwater flows if these are not appropriately managed by the Three Waters provisions): (a) requiring provision of urban green space, particularly canopy trees, to reduce urban heat and reduce stormwater flowrates: (f) prioritising the use of appropriate indigenous species, ... and (e) promoting appropriate design of buildings and infrastructure so they are able to withstand the predicted future higher temperatures, intensity and duration of rainfall and wind over their anticipated life span.	Oppose	Kāinga Ora is concerned that the proposed would have an effect on development potential and also questions how this would be monitored in terms of maintenance. This coverage would also have an effect in terms of sunlight access and in terms of private outdoor space.	Disallow

452	189d	Wellington Regional Council	Residential Zones	All zones	Amend	<p>Seeks to add a new policy to address the cost of providing tree canopy cover as per below example:</p> <p><u>Policy – The cost of providing tree canopy cover and financial contributions. a. Ensure the cost of providing new trees to achieve the tree canopy cover required for the site or the road corridor, preparing appropriate tree pits, providing the necessary land for planting, and initial tree maintenance is met by those carrying out the subdivision and/or development;</u></p> <p><u>b. Require payment of financial contributions that are fair and proportional in lieu of providing the required on-site and/or on-road tree canopy cover to enable off-site tree planting by the Council, as close to the development site as practicable;</u></p> <p><u>c. No financial contribution shall be required where sufficient existing trees, able to achieve the required tree canopy cover at maturity, are retained on the development site or new trees are planted on the development site by the developer or the site owner to achieve the required tree canopy cover.</u></p>	<p>Considers there is a gap in the proposed HDP to provide for Policy CC.4 clause (a) in relation to urban heat (and stormwater flows if these are not appropriately managed by the Three Waters provisions): (a) requiring provision of urban green space, particularly canopy trees, to reduce urban heat and reduce stormwater flowrates: (i) prioritising the use of appropriate indigenous species, ... and (e) promoting appropriate design of buildings and infrastructure so they are able to withstand the predicted future higher temperatures, intensity and duration of rainfall and wind over their anticipated life span.</p>	Oppose	Kāinga Ora is concerned how this FC would be calculated and seek that any FC implemented is fair and reasonable.	Disallow
452	189e	Wellington Regional Council	Residential Zones	All zones	Amend	<p>Seeks to add a new policy to address the cost of providing tree canopy cover as per below example:</p> <p><u>Policy – Tree health and infrastructure.</u></p> <p><u>a. Ensure that trees on the development site are planted in a position appropriate to the tree type and in sufficient soil volume, width and depth to maximise the tree's healthy growth.</u></p> <p><u>b. Where subdivision consents associated with the development of new residential units are granted, consent notices will be issued and registered against the relevant titles requiring that the tree canopy cover levels required are achieved and maintained.</u></p> <p><u>c. Ensure the planting of trees in the future roads of greenfield subdivisions is carried out in accordance with:</u></p> <p><u>i. the tree pit requirements of the Council's Infrastructure Design Standard to provide sufficient soil volume and avoid damage to the surrounding infrastructure; and</u></p> <p><u>ii. the needs and requirements of the Council, as the future road owner/manager, including approval of the tree species by the Council arborist.</u></p>	<p>Considers there is a gap in the proposed HDP to provide for Policy CC.4 clause (a) in relation to urban heat (and stormwater flows if these are not appropriately managed by the Three Waters provisions): (a) requiring provision of urban green space, particularly canopy trees, to reduce urban heat and reduce stormwater flowrates: (i) prioritising the use of appropriate indigenous species, ... and (e) promoting appropriate design of buildings and infrastructure so they are able to withstand the predicted future higher temperatures, intensity and duration of rainfall and wind over their anticipated life span.</p>	Oppose	Kāinga Ora is concerned that the proposed would have an effect on development potential and also questions how this would be monitored in terms of maintenance. This coverage would also have an effect in terms of sunlight access and in terms of private outdoor space.	Disallow
452	189f	Wellington Regional Council	Residential Zones	All zones	Amend	<p>Seeks to add a new policy to address the cost of providing tree canopy cover as per below example:</p> <p><u>Policy XX: Promote and enable the design of buildings and infrastructure so that they are able to withstand the predicted, future higher temperatures, intensity and duration of rainfall and wind over their anticipated life span and to mitigate the effects of these on people and communities.</u></p>	<p>Considers there is a gap in the proposed HDP to provide for Policy CC.4 clause (a) in relation to urban heat (and stormwater flows if these are not appropriately managed by the Three Waters provisions): (a) requiring provision of urban green space, particularly canopy trees, to reduce urban heat and reduce stormwater flowrates: (i) prioritising the use of appropriate indigenous species, ... and (e) promoting appropriate design of buildings and infrastructure so they are able to withstand the predicted future higher temperatures, intensity and duration of rainfall and wind over their anticipated life span.</p>	Oppose	Kāinga Ora is concerned that the proposed would have an effect on development potential and also questions how this would be monitored in terms of maintenance. This coverage would also have an effect in terms of sunlight access and in terms of private outdoor space.	Disallow
452	189g	Wellington Regional Council	Residential Zones	All zones	Amend	<p>Seeks to add new rule(s) and standard(s) to appropriate zone chapters to give effect to the Tree Canopy Cover and Financial Contributions policies in submission points 452.189a, 452.189b, 452.189c, 452.189d, 452.189e, and 452.189f.</p>	<p>Considers there is a gap in the proposed HDP to provide for Policy CC.4 clause (a) in relation to urban heat (and stormwater flows if these are not appropriately managed by the Three Waters provisions): (a) requiring provision of urban green space, particularly canopy trees, to reduce urban heat and reduce stormwater flowrates: (i) prioritising the use of appropriate indigenous species, ... and (e) promoting appropriate design of buildings and infrastructure so they are able to withstand the predicted future higher temperatures, intensity and duration of rainfall and wind over their anticipated life span.</p>	Oppose	Kāinga Ora is concerned that the proposed would have an effect on development potential and also questions how this would be monitored in terms of maintenance. This coverage would also have an effect in terms of sunlight access and in terms of private outdoor space.	Disallow