



## ARA POUTAMA AOTEAROA, THE DEPARTMENT OF CORRECTIONS: SUBMISSION ON THE WELLINGTON CITY PROPOSED DISTRICT PLAN

**To:** Wellington City Council  
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Ara Poutama Aotearoa, the Department of Corrections (**Ara Poutama**) makes submissions on the Wellington City Proposed District Plan (**PDP**) in the **attached** document.

Ara Poutama confirms it could not gain an advantage in trade competition through this submission.

Ara Poutama would like to be heard in support of its submission. If other submitters make a similar submission, Ara Poutama will consider presenting a joint case with them at a hearing.

A handwritten signature in blue ink, appearing to read 'Andrea Millar', is written over a horizontal line.

**Andrea Millar – Manager, Resource Management and Land Management**

For and behalf of Ara Poutama Aotearoa, the Department of Corrections

Dated this 12<sup>th</sup> day of September 2022

## Introduction

Ara Poutama Aotearoa, the Department of Corrections (**Ara Poutama**) is responsible under the Corrections Act 2004 for enforcing sentences and orders of the criminal court and the New Zealand parole board. In meeting this responsibility, Ara Poutama establishes and operates custodial and non-custodial corrections facilities, monitors people in the care of the Ara Poutama serving their sentences in the community, and provides supported and transitional accommodation to assist people to reintegrate back into the community.

## Custodial Corrections Facilities

Custodial corrections facilities include prisons and detention facilities and may also include non-custodial transitional accommodation (i.e. on a custodial facility site) for people with high and complex needs, who have completed a prison sentence and are being supported and prepared for reintegration and transition back into the community. Non-custodial rehabilitation activities and programmes may also occur on-site.

Ara Poutama operates one custodial facility within Wellington City. This is a prison facility for women located at 13 Main Road, Tawa, known as Arohata Prison. The site is designated under the PDP by the Minister of Corrections for "Corrections purposes", designation identifier 'MCOR2'.

Arohata Prison is an important part of the corrections facility network which provides for the safety and security of all New Zealand communities and is of national significance. It is one of just three women's prison facilities in the country and the only women's prison in the Greater Wellington area, and therefore has significance in a regional and district context. The facility plays a vital role in the region in allowing Ara Poutama to meet its responsibilities under the Corrections Act 2004 for enforcing sentences and orders of the criminal courts and the New Zealand parole board.

Ara Poutama also used to operate a men's prison facility within Wellington City. This is the former Mount Crawford Prison, also known as Wellington Prison, located near the northern tip of the Miramar Peninsula. The site is designated under the PDP by the Minister of Corrections for "Corrections purposes", designation number 'MCOR1'. While Mount Crawford Prison is no longer operational, the Minister will retain the designation until the property is sold. A timeline for the disposal process is unclear, but the site is currently under interim management by Land Information New Zealand, who are managing the disposal process.

Where intensification occurs adjacent to custodial corrections facilities, it is important that this does not create the opportunity for a breach in security, for example enabling contraband to be thrown over fences into the facility. It is also important that the operational Arohata Prison is not subject to reverse sensitivity issues, such as privacy and amenity of adjacent multi-level residential developments that can see into the facility.

## Non-Custodial Community Corrections Sites

Non-custodial community corrections sites include service centres and community work facilities and are essential social infrastructure. Non-custodial services and their associated infrastructure play a valuable role in reducing reoffending. Community work helps offenders learn vital skills and to give back to their community, and in return the community benefits from improved amenities. Ara Poutama considers that its services enable people and communities to provide for their social and cultural well-being and for their health and safety, and therefore those activities and services contribute to the sustainable management purpose of the Resource Management Act 1991 (**RMA**).

The service centres provide for probation, rehabilitation, and reintegration services. Offenders report to probation officers as required by the courts or as conditions of parole. Ara Poutama's staff use service centres to undertake assessments and compile reports for the courts, police and probation officers. Service centres may also be used as administrative bases for staff involved in community-based activities or used as a place for therapeutic services (e.g., psychological assessments). The overall activity is effectively one of an office where the generic activities involved are meetings and workshop type sessions, activities which are common in other office environments.

In addition to these service centres, Ara Poutama operates community work facilities. Community work is a sentence where offenders are required to undertake unpaid work for non-profit organisations and community projects. Offenders will report to a community work facility where they subsequently travel to their community work project under the supervision of a Community Work Supervisor. The community work facilities can be large sites with yard-based activities and large equipment and/or vehicle storage.

Service centres and community work facilities may also be co-located on the same site.

Community corrections sites support offenders living in that community. Ara Poutama therefore looks to locate its sites in areas accessible to offenders, and near other supporting government agencies. Commonly, sites are therefore located in commercial or business areas, but may also be located in industrial areas, where large lots and accessibility suit the yard-based nature of some operations. As community corrections facilities are not sensitive to the effects of an industrial environment (e.g., noise, high traffic movements, etc), they are not prone to reverse sensitivity.

Ara Poutama currently operates one non-custodial community corrections site in Wellington City, located at 42 Adelaide Road, Mount Cook.<sup>1</sup> This site is a community corrections service centre and community work facility, and is located within the City Centre Zone in the PDP.

Demand for these services exist nationally, and particularly within Wellington City. It is important that provision is made to enable non-custodial community corrections sites to establish, operate and redevelop, within appropriate areas, which may include areas of housing intensification.

## **Residential Activities**

Ara Poutama operates residential housing in the community throughout New Zealand, providing support for some people in its care to assist with their transition and/or integration in the community. There is a range of rehabilitation, reintegration and support provided in these houses, depending on the needs of the residents. Housing and associated support services may be for people following their release from prison, or may be used to accommodate those on bail or community-based sentences (such as home detention).

Residential accommodation (with support) provides necessary facilities, such as sleeping, cooking, bathing and toilet facilities, which encompass a typical household living scenario; and a typical residential dwelling, within a residential setting, is utilised for such purposes. People living in this residential environment are not detained on-site, the same as anyone else living in the community, except that some people may be electronically monitored and/or supervised. In some instances, supervisory staff are present on-site to provide a level of care (being a range of rehabilitation, re-integration and support services) appropriate to meet the needs of the individual(s) residing at the site. It is noted that these support staff do not reside on-site and have an alternative residential address. In other instances, supervisory staff will provide support on a part-time basis.

The Courts may sentence an offender to home detention as an alternative to imprisonment. Individuals on home detention serve a home-based sentence at a suitable and approved residence and are electronically monitored 24 hours a day, seven days a week. The purpose of electronic monitoring is to deter the offender from breaching conditions that relate to his or her whereabouts and monitor compliance with those conditions.<sup>2</sup> Home detention and electronic monitoring allow individuals to seek or maintain employment, complete a sentence of community work if imposed, access programmes to address their offending, be involved in prosocial activities, and maintain their family relationships. It is an increasingly common sentence for many individuals in our care who otherwise would have received a short prison sentence for their offending (they can be sentenced to home detention from 14 days to one year). People on a home detention sentence are generally required to remain at a typical residential dwelling.

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<sup>1</sup> Site located in the Centres Area under the Operative District Plan. A Certificate of Compliance was confirmed by WCC for the use of the site for a community corrections purposes on 11 September 2020 (Service Request No: 471895, File Reference: 1019826).

<sup>2</sup> Sentencing Act 2002, section 80E.

Ara Poutama is responsible for a range of residential accommodation (with support), which vary in nature and scale, of all which fall within the ambit of a residential activity.

Demand for these services exist nationally, including within Wellington City. It is important that provision is made to enable residential accommodation activities (with support) to establish, operate and redevelop, within appropriate areas, which is likely to include areas of housing intensification.

### **Ara Poutama's Submission on the Proposed Wellington District Plan, including Intensification Planning Instrument (IPI) Provisions**

Ara Poutama has an interest in the implications that the PDP will have on the establishment and operation of custodial facilities, non-custodial facilities, and residential accommodation (with support), in Wellington City.

The PDP incorporates the requirements of the National Policy Statement for Urban Development (NPS-UD) 2020, and gives effect to the Medium Density Residential Standards (MDRS), which are being proposed via an IPI. Intensification and population growth in urban areas has an implication for the delivery of the services Ara Poutama is required to provide in Wellington City.

Ara Poutama's specific submissions on the PDP and IPI are outlined in the following table.

## Submissions

PDP Provision	Submission	Relief Sought (additions shown in <u>underline</u> , deletions shown in <del>strikethrough</del> )
Part 1 – Introduction and General Provisions / Interpretation / Definitions  “Community corrections activity”	<p><b>Support</b></p> <p>Ara Poutama requests that the definition of “community corrections activity” is retained.</p> <p>The definition is consistent with the wording provided for in the National Planning Standards.</p> <p>Community corrections activities are essential social infrastructure and play a valuable role in reducing reoffending. They enable people and communities to provide for their social and cultural well-being and for their health and safety.</p>	1. Retain the definition of “community corrections activity”.
Part 1 – Introduction and General Provisions / Interpretation / Definitions  “Custodial corrections facility”	<p><b>Support</b></p> <p>Ara Poutama requests that the definition of “custodial corrections facility” is retained.</p> <p>The definition is appropriate in ‘capturing’ custodial facilities such as Arohata Prison.</p> <p>Custodial facilities are essential social infrastructure. They enable people and communities to provide for their social and cultural well-being and for their health and safety.</p>	1. Retain the definition of “custodial corrections facility”.
Part 1 – Introduction and General Provisions / Interpretation / Definitions  “Non-custodial rehabilitation activity”	<p><b>Support</b></p> <p>Ara Poutama requests that the definition of “non-custodial rehabilitation activity” is retained.</p> <p>The definition is appropriate in ‘capturing’ non-custodial rehabilitative and reintegration activities and programmes.</p> <p>Non-custodial rehabilitative and reintegration activities and programmes are an important component of the rehabilitative process for people under Ara Poutama’s supervision. They enable people and communities to provide for their social and cultural well-being and for their health and safety.</p>	1. Retain the definition of “non-custodial rehabilitation activity”.
Part 1 – Introduction and General Provisions / Interpretation / Definitions  “Residential activity”	<p><b>Support</b></p> <p>Ara Poutama requests that the definition of “residential activity” is retained.</p> <p>The definition is consistent with the wording provided for in the National Planning Standards.</p> <p>This definition applies to supported and transitional accommodation</p>	1. Retain the definition of “residential activity”.

PDP Provision	Submission	Relief Sought (additions shown in <u>underline</u> , deletions shown in <del>strikethrough</del> )
	<p>activities, such as those provided for by Ara Poutama; i.e. people living in a residential situation, who are subject to support and/or supervision by Ara Poutama. Providing reintegration and rehabilitation support is an important component of the reintegration process for people under Ara Poutama's supervision. It enables people and communities to provide for their social and cultural well-being and for their health and safety.</p>	
<p>Part 1 – Introduction and General Provisions / Interpretation / Definitions</p> <p>“Supported residential care activity”</p>	<p><b>Neutral</b></p> <p>Ara Poutama's position is that the definition of “residential activity” entirely captures supported and transitional accommodation activities, such as those provided for by Ara Poutama; i.e. people living in a residential situation, who are subject to support and/or supervision by Ara Poutama. That is, supported and transitional accommodation activities use “<i>land and building(s) for people's living accommodation</i>” (as per the definition of “residential activity”). As such, there is no need for a separate and standalone definition of “supported residential care activity” and the associated provisions applying to such throughout the PDP.</p> <p>However, should Council see it as being absolutely necessary to implement the separate definition of “supported residential care activity”, and the associated provisions throughout the PDP, then the wording of the definition should be retained as notified.</p>	<ol style="list-style-type: none"> <li>1. Remove the definition of “supported residential care activity”, and the associated provisions applying to such throughout the PDP; but</li> <li>2. If Council are to retain the “supported residential care activity” definition and the associated PDP provisions, then the wording of the definition should be retained as notified.</li> </ol>
<p>Part 2 – District-Wide Matters / Strategic / Direction / Urban Form and Development</p> <p>Strategic Objective UFD-O6</p>	<p><b>Neutral</b></p> <p>Ara Poutama's position is that the definition of “residential activity” entirely captures supported and transitional accommodation activities, such as those provided for by Ara Poutama; i.e. people living in a residential situation, who are subject to support and/or supervision by Ara Poutama, and therefore a separate definition of “supported residential care activities” is unnecessary.</p> <p>Such activities are an important component of the rehabilitation and reintegration process for people under Ara Poutama's supervision. They enable people and communities to provide for their social and cultural well-being and for their health and safety.</p> <p>However, should Council see it as being absolutely necessary to implement the separate definition of “supported residential care activity”, then the wording of Strategic Objective UFD-O6 (which references and enables supported residential care activities), should be retained as notified.</p>	<ol style="list-style-type: none"> <li>1. Remove the reference to “supported residential care activity” from Strategic Objective UFD-O6; but</li> <li>2. If Council are to retain the “supported residential care activity” definition, then the wording of Strategic Objective UFD-O6 should be retained as notified.</li> </ol>
<p>Part 3 – Area-Specific Matters / Zones</p>	<p><b>Support in part</b></p> <p>Ara Poutama requests that the enabled activities policies and permitted</p>	<ol style="list-style-type: none"> <li>1. Retain the enabled activities policies applying to “community corrections activities” in the Neighbourhood Centre, Local Centre, Metropolitan, City Centre and Corrections Zones. These include:</li> </ol>

PDP Provision	Submission	Relief Sought (additions shown in <u>underline</u> , deletions shown in <del>strikethrough</del> )												
<p>Enabled activities policies and land use activity rules for community corrections activities in the Neighbourhood Centre Zone, Local Centre Zone, Mixed Use Zone, Metropolitan Centre Zone, City Centre Zone and Corrections Zone</p>	<p>land use activity rules applying to community corrections activities in the Neighbourhood Centre, Local Centre, Mixed Use, Metropolitan Centre, City Centre and Corrections zones are retained.</p> <p>Community corrections activities are essential social infrastructure and play a valuable role in reducing reoffending. They enable people and communities to provide for their social and cultural well-being and for their health and safety. It is important that provision is made to enable non-custodial community corrections sites to establish, operate and redevelop, within appropriate areas, as the demand for these services is likely to increase as a result of urban intensification.</p> <p>The permitted activity status (enabled by the associated policies) is appropriate in the context of the current and potential future establishment and operation of a community corrections facility or facilities within these areas in Wellington City.</p> <p>There is a minor drafting error within the Mixed Use Zone Policy MUZ-P2.7 and Rule MUZ-R6, whereby “community corrections <i>facilities</i>” are referenced; this needs to be amended to reflect correct terminology in the PDP definition (i.e. “community corrections <i>activities</i>”).</p>	<ul style="list-style-type: none"> <li>• NCZ-P2.7</li> <li>• LCZ-P2.7</li> <li>• MCZ-P2.8</li> <li>• CCZ-P1.8</li> <li>• CORZ-P2.3</li> </ul> <p>2. Retain the land use activity rules applying to “community corrections activities” in the Neighbourhood Centre, Local Centre, Metropolitan, City Centre and Corrections Zones. These include:</p> <ul style="list-style-type: none"> <li>• NCZ-R6</li> <li>• LCZ-R6</li> <li>• MCZ-R7</li> <li>• CCZ-R8</li> <li>• CORZ-R3</li> </ul> <p>3. Amend the minor drafting error under Mixed Use Zone Policy MUZ-P2.7 as follows:</p> <table border="1" data-bbox="1346 836 2078 1098"> <tr> <td style="text-align: center;"><b>MUZ-P2</b></td> <td><b>Enabled activities</b></td> </tr> <tr> <td></td> <td><i>Enable a wide range of compatible activities in the Mixed Use Zone where they are of an appropriate nature, scale and intensity for the zone and the hierarchy of centres, including:</i></td> </tr> <tr> <td></td> <td>...</td> </tr> <tr> <td></td> <td><i>7. Community corrections <del>facilities</del><u>activities</u>;</i></td> </tr> </table> <p>4. Amend the minor drafting error under Mixed Use Zone Rule MUZ-R6 as follows:</p> <table border="1" data-bbox="1346 1214 2078 1305"> <tr> <td style="text-align: center;"><b>MUZ-R6</b></td> <td><b>Community corrections <del>facilities</del><u>activities</u></b></td> </tr> <tr> <td style="background-color: #92d050;"></td> <td>1. Activity status: <b>Permitted</b></td> </tr> </table>	<b>MUZ-P2</b>	<b>Enabled activities</b>		<i>Enable a wide range of compatible activities in the Mixed Use Zone where they are of an appropriate nature, scale and intensity for the zone and the hierarchy of centres, including:</i>		...		<i>7. Community corrections <del>facilities</del><u>activities</u>;</i>	<b>MUZ-R6</b>	<b>Community corrections <del>facilities</del><u>activities</u></b>		1. Activity status: <b>Permitted</b>
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<p>Part 3 – Area-Specific Matters / Zones</p> <p>Enabled activities policies</p>	<p><b>Oppose</b></p> <p>Ara Poutama requests that the enabled activities policies and land use activity rules applying to community corrections activities in the</p>	<p>1. Amend Commercial Zone Policy COMZ-P1 to reference “community corrections activities” as follows:</p> <table border="1" data-bbox="1346 1378 2078 1422"> <tr> <td style="text-align: center;"><b>COMZ-P1</b></td> <td><b>Enabled activities</b></td> </tr> </table>	<b>COMZ-P1</b>	<b>Enabled activities</b>										
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<p>and land use activity rules for community corrections activities in the Commercial Zone and General Industrial Zone</p>	<p>Commercial and General Industrial Zones are amended. The zone frameworks do not enable community corrections activities, and provides discretionary activity status for these activities in the zones, in accordance with the respective default “<i>all other activities</i>” rules (COMZ-R4 and GIZ-R6).</p> <p>Community corrections activities are essential social infrastructure and play a valuable role in reducing reoffending. They enable people and communities to provide for their social and cultural well-being and for their health and safety. It is important that provision is made to enable non-custodial community corrections sites to establish, operate and redevelop, within appropriate areas, as the demand for these services is likely to increase as a result of urban intensification.</p> <p>Industrial and commercial areas provide suitable sites for community corrections activities; in particular community work components often require large sites for yard-based activities and large equipment and/or vehicle storage.</p> <p>Community corrections activities are a compatible and appropriate activity in commercial and industrial zones. They are consistent with the character and amenity of such zones. Furthermore, as community corrections facilities are not sensitive to the effects of commercial and industrial environments (e.g. noise, high traffic movements, etc), they are not prone to reverse sensitivity.</p> <p>Ara Poutama therefore requests that the enabled activities policies and land use activity rule framework be amended to provide for “community corrections activities” as a permitted activity.</p>	<table border="1" data-bbox="1346 212 2078 587"> <tr> <td></td> <td> <p>Enable a range of activities in the Commercial Zone that contribute positively to the purpose of the zone including:</p> <ol style="list-style-type: none"> <li>1. Commercial activities;</li> <li>2. Retail activities, except for large-scale integrated retail activities;</li> <li>3. Carparking activities;<del>and</del></li> <li>4. Residential activities, except for large-scale integrated retail activities<del>;</del> <u>and</u></li> <li>5. <u>Community corrections activities.</u></li> </ol> </td> </tr> </table> <p>2. Amend the land use activity rule framework for the Commercial Zone to include a permitted rule applying to “community corrections activities” as follows:</p> <table border="1" data-bbox="1346 730 2078 823"> <tr> <td><b><u>COMZ-RX</u></b></td> <td><b><u>Community corrections activities</u></b></td> </tr> <tr> <td></td> <td>1. Activity status: <b><u>Permitted</u></b></td> </tr> </table> <p>3. Amend General Industrial Zone Policy GIZ-P1 to reference “community corrections activities” as follows:</p> <table border="1" data-bbox="1346 938 2078 1054"> <tr> <td><b><u>GIZ-P1</u></b></td> <td><b><u>Enabled activities</u></b></td> </tr> <tr> <td></td> <td>Enable industrial activities <u>and community corrections activities</u> in the General Industrial Zone.</td> </tr> </table> <p>4. Amend the land use activity rule framework for the General Industrial Zone to include a permitted rule applying to “community corrections activities” as follows:</p> <table border="1" data-bbox="1346 1198 2078 1289"> <tr> <td><b><u>GIZ-RX</u></b></td> <td><b><u>Community corrections activities</u></b></td> </tr> <tr> <td></td> <td>1. Activity status: <b><u>Permitted</u></b></td> </tr> </table>		<p>Enable a range of activities in the Commercial Zone that contribute positively to the purpose of the zone including:</p> <ol style="list-style-type: none"> <li>1. Commercial activities;</li> <li>2. Retail activities, except for large-scale integrated retail activities;</li> <li>3. Carparking activities;<del>and</del></li> <li>4. Residential activities, except for large-scale integrated retail activities<del>;</del> <u>and</u></li> <li>5. <u>Community corrections activities.</u></li> </ol>	<b><u>COMZ-RX</u></b>	<b><u>Community corrections activities</u></b>		1. Activity status: <b><u>Permitted</u></b>	<b><u>GIZ-P1</u></b>	<b><u>Enabled activities</u></b>		Enable industrial activities <u>and community corrections activities</u> in the General Industrial Zone.	<b><u>GIZ-RX</u></b>	<b><u>Community corrections activities</u></b>		1. Activity status: <b><u>Permitted</u></b>
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<p>Part 3 – Area-Specific Matters / Zones</p> <p>Enabled activities policies and land use activity rules</p>	<p><b>Support</b></p> <p>Ara Poutama requests that the enabled activities policies and permitted land use activity rules applying to residential activities in the Medium Density Residential, High Density Residential, Large Lot Residential,</p>	<p>1. Retain the enabled activities policies applying to “residential activities” in the Medium Density Residential, High Density Residential, Large Lot Residential, General Rural, Neighbourhood Centre, Local Centre, Commercial, Mixed Use, Metropolitan Centre, City Centre and</p>														



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<p>for residential activities in the Medium Density Residential Zone, High Density Residential Zone, Large Lot Residential Zone, General Rural Zone, Neighbourhood Centre Zone, Local Centre Zone, Commercial Zone, Mixed Use Zone, Metropolitan Centre Zone, City Centre Zone and Waterfront Zone.</p>	<p>General Rural, Neighbourhood Centre, Local Centre, Commercial, Mixed Use, Metropolitan Centre, City Centre and Waterfront zones are retained.</p> <p>The permitted activity status (enabled by the associated policies) is appropriate in the context of the establishment and operation of supported and transitional accommodation activities, such as those provided for by Ara Poutama; i.e. people living in a residential situation, who are subject to support and/or supervision by Ara Poutama.</p>	<p>Waterfront zones. These include:</p> <ul style="list-style-type: none"> <li>• MRZ-P1</li> <li>• HRZ-P1</li> <li>• LLRZ-P1</li> <li>• GRUZ-P1.2</li> <li>• NCZ-P2.2</li> <li>• LCZ-P2.2</li> <li>• COMZ-P1.4</li> <li>• MUZ-P2.10</li> <li>• MCZ-P2.2</li> <li>• CCZ-P1.2</li> <li>• WFZ-P1.8</li> </ul> <p>2. Retain the land use activity rules applying to “residential activities” in the Medium Density Residential, High Density Residential, Large Lot Residential, General Rural, Neighbourhood Centre, Local Centre, Commercial, Mixed Use, Metropolitan Centre, City Centre and Waterfront zones. These include:</p> <ul style="list-style-type: none"> <li>• MRZ-R2</li> <li>• HRZ-R2</li> <li>• LLRZ-R1</li> <li>• GRUZ-R4</li> <li>• NCZ-R10</li> <li>• LCZ-R10</li> <li>• COMZ-R2</li> <li>• MUZ-R10</li> <li>• MCZ-R12</li> <li>• CCZ-R12</li> <li>• WFZ-R8</li> </ul>

PDP Provision	Submission	Relief Sought (additions shown in <u>underline</u> , deletions shown in <del>strikethrough</del> )		
<p>Part 3 – Area-Specific Matters / Zones</p> <p>Enabled activities policies and land use activity rules for supported residential care activities in the Medium Density Residential Zone, High Density Residential Zone, Large Lot Residential Zone and Corrections Zone</p>	<p><b>Neutral</b></p> <p>Ara Poutama’s position is that the definition of “residential activity” entirely captures supported and transitional accommodation activities, such as those provided for by Ara Poutama; i.e. people living in a residential situation, who are subject to support and/or supervision by Ara Poutama, and therefore a separate definition of “supported residential care activities” is unnecessary.</p> <p>However, should Council see it as being absolutely necessary to implement the separate definition of “supported residential care activity”, then Ara Poutama requests that the enabled activities policies and permitted land use activity rules applying to supported residential care activities in the Medium Density Residential, High Density Residential, Large Lot Residential and Corrections zones are retained as notified.</p> <p>The permitted activity status (enabled by the associated policies) is appropriate in the context of the establishment and operation of supported and transitional accommodation activities. Such activities are an important component of the rehabilitation and reintegration process for people under Ara Poutama’s supervision. They enable people and communities to provide for their social and cultural well-being and for their health and safety.</p>	<ol style="list-style-type: none"> <li>Remove the references to “supported residential care activity” from the Medium Density Residential, High Density Residential, Large Lot Residential and Corrections zones; but</li> <li>If Council are to retain the “supported residential care activity” definition, then retain as notified the enabled activities policies applying to “supported residential care activities” in the Medium Density Residential, High Density Residential, Large Lot Residential and Corrections zones. These include: <ul style="list-style-type: none"> <li>MRZ-P1.4</li> <li>HRZ-P1.4</li> <li>LLRZ-P2</li> <li>CORZ-P2.4</li> </ul> </li> <li>If Council are to retain the “supported residential care activity” definition, then retain as notified the land use activity rules applying to “supported residential care activities” in the Medium Density Residential, High Density Residential, Large Lot Residential and Corrections zones. These include: <ul style="list-style-type: none"> <li>MRZ-R4</li> <li>HRZ-R4</li> <li>LLRZ-R5</li> <li>CORZ-R4</li> </ul> </li> </ol>		
<p>Part 3 – Area-Specific Matters / Zones</p> <p>Enabled activities policies and land use activity rules for supported residential care activities in the Mixed Use Zone, City Centre Zone and Waterfront Zone</p>	<p><b>Neutral</b></p> <p>Ara Poutama’s position is that the definition of “residential activity” entirely captures supported and transitional accommodation activities, such as those provided for by Ara Poutama; i.e. people living in a residential situation, who are subject to support and/or supervision by Ara Poutama, and therefore a separate definition of “supported residential care activities” is unnecessary.</p> <p>However, should Council see it as being absolutely necessary to implement the separate definition of “supported residential care activity”, then Ara Poutama requests that the enabled activities policies and land use activity rules applying to supported and transitional accommodation activities in the Mixed Use, City Centre and Waterfront zones are amended. The zone frameworks would not otherwise enable supported residential care activities, and provides discretionary activity status for</p>	<ol style="list-style-type: none"> <li>Retain as notified the provisions applicable to “residential activities” in the Mixed Use, City Centre and Waterfront zones; but</li> <li>If Council are to retain the “supported residential care activity” definition, then amend Mixed Use Zone Policy MUZ-P2 to reference “supported residential care activities” as follows: <table border="1" data-bbox="1346 1158 2078 1402"> <tr> <td data-bbox="1346 1158 1503 1402"><b>MUZ-P2</b></td> <td data-bbox="1503 1158 2078 1402"> <p><b>Enabled activities</b></p> <p><i>Enable a wide range of compatible activities in the Mixed Use Zone where they are of an appropriate nature, scale and intensity for the zone and the hierarchy of centres, including:</i></p> <p>...</p> <p><i>10. Residential activities and supported residential</i></p> </td> </tr> </table> </li> </ol>	<b>MUZ-P2</b>	<p><b>Enabled activities</b></p> <p><i>Enable a wide range of compatible activities in the Mixed Use Zone where they are of an appropriate nature, scale and intensity for the zone and the hierarchy of centres, including:</i></p> <p>...</p> <p><i>10. Residential activities and supported residential</i></p>
<b>MUZ-P2</b>	<p><b>Enabled activities</b></p> <p><i>Enable a wide range of compatible activities in the Mixed Use Zone where they are of an appropriate nature, scale and intensity for the zone and the hierarchy of centres, including:</i></p> <p>...</p> <p><i>10. Residential activities and supported residential</i></p>			

PDP Provision	Submission	Relief Sought (additions shown in <u>underline</u> , deletions shown in <del>strikethrough</del> )										
	<p>these activities in the zones, in accordance with the respective default “<i>all other activities</i>” rules (MUZ-R13, CCZ-R16 and WFZ-R11).</p> <p>Supported and transitional accommodation activities, such as those provided for by Ara Poutama, are an important component of the rehabilitation and reintegration process for people under Ara Poutama’s supervision. They enable people and communities to provide for their social and cultural well-being and for their health and safety.</p> <p>The subject zones include suitable locations for supported and transitional accommodation activities; as they are close to civic amenities and services. This is apparent in that the zones provide for residential activities as permitted, including aligned activities such as visitor accommodation.</p> <p>Supported and transitional accommodation activities are a compatible and appropriate activity in the Mixed Use, City Centre and Waterfront zones. They are consistent with the character and amenity of such zones, and the effects of such can be managed through the imposition of a restriction on the maximum number of residents (10), as is the case in the residential zones.</p> <p>Ara Poutama therefore requests that the enabled activities policies and land use activity rule framework be amended to provide for supported and transitional accommodation activities as a permitted activity (should the definition of “support residential care activities” be retained).</p>	<table border="1" data-bbox="1346 213 2078 256"> <tr> <td data-bbox="1346 213 1503 256"></td> <td data-bbox="1503 213 2078 256"><u>care activities above ground floor level; ...</u></td> </tr> </table> <p>3. If Council are to retain the “supported residential care activity” definition, then amend the land use activity rule framework for the Mixed Use Zone to include a permitted rule applying to “supported residential care activities” as follows:</p> <table border="1" data-bbox="1346 427 2078 1380"> <thead> <tr> <th data-bbox="1346 427 1397 475"><b><u>MUZ-RX</u></b></th> <th data-bbox="1397 427 2078 475"><b><u>Supported residential care activities</u></b></th> </tr> </thead> <tbody> <tr> <td data-bbox="1346 475 1397 651" style="background-color: #90EE90;"></td> <td data-bbox="1397 475 2078 651"> <p><b><u>1. Activity status: Permitted</u></b></p> <p><u>Where:</u></p> <p><u>a. The activity is located above ground floor level; and</u></p> <p><u>b. The maximum occupancy does not exceed 10 residents.</u></p> </td> </tr> <tr> <td data-bbox="1346 651 1397 1337" style="background-color: #FFD700;"></td> <td data-bbox="1397 651 2078 1337"> <p><b><u>2. Activity status: Restricted Discretionary</u></b></p> <p><u>Where:</u></p> <p><u>a. Compliance with the requirements of MUZ-RX.1.a cannot be achieved.</u></p> <p><u>Matters of discretion are:</u></p> <p><u>1. The matters in MUZ-P1, MUZ-P2 and MUZ-P5;</u></p> <p><u>2. The extent to which the activity is the most appropriate to meet Wellington’s future growth needs;</u></p> <p><u>3. The compatibility with existing activities nearby and other activities provided for in the Mixed Use Zone;</u></p> <p><u>4. The effect on the visual quality of the streetscape and the extent to which the development contributes to or detracts from the pedestrian environment; and</u></p> <p><u>5. The extent to which the activity enables or limits adaptability for future non-residential activity at ground floor level.</u></p> <p><u>Notification status: An application for resource consent made in respect of rule MUZ-RX.2.a is precluded from being publicly notified.</u></p> </td> </tr> <tr> <td data-bbox="1346 1337 1397 1380" style="background-color: #FFD700;"></td> <td data-bbox="1397 1337 2078 1380"> <p><b><u>3. Activity status: Restricted Discretionary</u></b></p> </td> </tr> </tbody> </table>		<u>care activities above ground floor level; ...</u>	<b><u>MUZ-RX</u></b>	<b><u>Supported residential care activities</u></b>		<p><b><u>1. Activity status: Permitted</u></b></p> <p><u>Where:</u></p> <p><u>a. The activity is located above ground floor level; and</u></p> <p><u>b. The maximum occupancy does not exceed 10 residents.</u></p>		<p><b><u>2. Activity status: Restricted Discretionary</u></b></p> <p><u>Where:</u></p> <p><u>a. Compliance with the requirements of MUZ-RX.1.a cannot be achieved.</u></p> <p><u>Matters of discretion are:</u></p> <p><u>1. The matters in MUZ-P1, MUZ-P2 and MUZ-P5;</u></p> <p><u>2. The extent to which the activity is the most appropriate to meet Wellington’s future growth needs;</u></p> <p><u>3. The compatibility with existing activities nearby and other activities provided for in the Mixed Use Zone;</u></p> <p><u>4. The effect on the visual quality of the streetscape and the extent to which the development contributes to or detracts from the pedestrian environment; and</u></p> <p><u>5. The extent to which the activity enables or limits adaptability for future non-residential activity at ground floor level.</u></p> <p><u>Notification status: An application for resource consent made in respect of rule MUZ-RX.2.a is precluded from being publicly notified.</u></p>		<p><b><u>3. Activity status: Restricted Discretionary</u></b></p>
	<u>care activities above ground floor level; ...</u>											
<b><u>MUZ-RX</u></b>	<b><u>Supported residential care activities</u></b>											
	<p><b><u>1. Activity status: Permitted</u></b></p> <p><u>Where:</u></p> <p><u>a. The activity is located above ground floor level; and</u></p> <p><u>b. The maximum occupancy does not exceed 10 residents.</u></p>											
	<p><b><u>2. Activity status: Restricted Discretionary</u></b></p> <p><u>Where:</u></p> <p><u>a. Compliance with the requirements of MUZ-RX.1.a cannot be achieved.</u></p> <p><u>Matters of discretion are:</u></p> <p><u>1. The matters in MUZ-P1, MUZ-P2 and MUZ-P5;</u></p> <p><u>2. The extent to which the activity is the most appropriate to meet Wellington’s future growth needs;</u></p> <p><u>3. The compatibility with existing activities nearby and other activities provided for in the Mixed Use Zone;</u></p> <p><u>4. The effect on the visual quality of the streetscape and the extent to which the development contributes to or detracts from the pedestrian environment; and</u></p> <p><u>5. The extent to which the activity enables or limits adaptability for future non-residential activity at ground floor level.</u></p> <p><u>Notification status: An application for resource consent made in respect of rule MUZ-RX.2.a is precluded from being publicly notified.</u></p>											
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		<p><u>Where:</u></p> <p><u>a. Compliance with the requirements of MUZ-RX.1.b cannot be achieved.</u></p> <p><u>Matters of discretion are:</u></p> <p><u>1. The extent to which the intensity and scale of the activity may adversely impact on the amenity values of nearby residential properties and the surrounding neighbourhood.</u></p> <p><u>Notification status: An application for resource consent made in respect of rule MUZ-RX.3.a is precluded from being publicly notified.</u></p> <p>4. If Council are to retain the “supported residential care activity” definition, then amend City Centre Zone Policy CCZ-P1 to reference “supported residential care activities” as follows:</p> <table border="1" data-bbox="1346 715 2078 1145"> <tr> <td data-bbox="1346 715 1503 1145"><b>CCZ-P1</b></td> <td data-bbox="1503 715 2078 1145"> <p><b>Enabled activities</b></p> <p>Enable a range and diversity of activities that support the purpose and ongoing viability of the City Centre Zone and enhances its vibrancy and amenity, including:</p> <p>1. Commercial activities;</p> <p>2. Residential activities <u>and supported residential care activities</u>, except;</p> <p>a. Along any street subject to active frontage and/or verandah coverage requirements;</p> <p>b. On any site subject to an identified natural hazard risk; ...</p> </td> </tr> </table> <p>5. If Council are to retain the “supported residential care activity” definition, then amend the land use activity rule framework for the City Centre Zone to include a permitted rule applying to “supported residential care activities” as follows:</p> <table border="1" data-bbox="1346 1318 2078 1406"> <tr> <td data-bbox="1346 1318 1503 1358"><b><u>CCZ-RX</u></b></td> <td data-bbox="1503 1318 2078 1358"><b><u>Supported residential care activities</u></b></td> </tr> <tr> <td data-bbox="1346 1358 1503 1406"></td> <td data-bbox="1503 1358 2078 1406">1. Activity status: <b><u>Permitted</u></b></td> </tr> </table>	<b>CCZ-P1</b>	<p><b>Enabled activities</b></p> <p>Enable a range and diversity of activities that support the purpose and ongoing viability of the City Centre Zone and enhances its vibrancy and amenity, including:</p> <p>1. Commercial activities;</p> <p>2. Residential activities <u>and supported residential care activities</u>, except;</p> <p>a. Along any street subject to active frontage and/or verandah coverage requirements;</p> <p>b. On any site subject to an identified natural hazard risk; ...</p>	<b><u>CCZ-RX</u></b>	<b><u>Supported residential care activities</u></b>		1. Activity status: <b><u>Permitted</u></b>
<b>CCZ-P1</b>	<p><b>Enabled activities</b></p> <p>Enable a range and diversity of activities that support the purpose and ongoing viability of the City Centre Zone and enhances its vibrancy and amenity, including:</p> <p>1. Commercial activities;</p> <p>2. Residential activities <u>and supported residential care activities</u>, except;</p> <p>a. Along any street subject to active frontage and/or verandah coverage requirements;</p> <p>b. On any site subject to an identified natural hazard risk; ...</p>							
<b><u>CCZ-RX</u></b>	<b><u>Supported residential care activities</u></b>							
	1. Activity status: <b><u>Permitted</u></b>							

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		<div style="background-color: #90EE90; padding: 5px; border: 1px solid black;"> <p><u>Where:</u></p> <p><u>a. The maximum occupancy does not exceed 10 residents; and</u></p> <p><u>b. The activity is located:</u></p> <p><u>i. Above ground floor level; or</u></p> <p><u>ii. At ground floor level along any street edge not identified as an active frontage; or</u></p> <p><u>iii. At ground level along any street not identified as requiring verandah coverage; or</u></p> <p><u>iv. At ground level on any site contained within a Natural Hazard Overlay.</u></p> </div> <div style="background-color: #FFD700; padding: 5px; border: 1px solid black;"> <p><b><u>2. Activity status: Restricted Discretionary</u></b></p> <p><u>Where:</u></p> <p><u>a. Compliance with the requirements of CCZ-RX.1.a cannot be achieved.</u></p> <p><u>Matters of discretion are:</u></p> <p><u>1. The extent to which the intensity and scale of the activity may adversely impact on the amenity values of nearby residential properties and the surrounding neighbourhood.</u></p> <p><u>Notification status: An application for resource consent made in respect of rule CCZ-RX.2.a is precluded from being publicly notified.</u></p> </div> <div style="background-color: #FF8C00; padding: 5px; border: 1px solid black;"> <p><b><u>3. Activity status: Discretionary</u></b></p> <p><u>Where:</u></p> <p><u>a. Compliance with any of the requirements of CCZ-RX.1.b cannot be achieved.</u></p> <p><u>Notification status: An application for resource consent made in respect of rule CCZ-RX.3.a is precluded from being publicly notified.</u></p> </div> <p>6. If Council are to retain the “supported residential care activity” definition, then amend Waterfront Zone Policy WFZ-P1 to reference “supported residential care activities” as follows:</p>

PDP Provision	Submission	Relief Sought (additions shown in <u>underline</u> , deletions shown in <del>strikethrough</del> )				
		<table border="1" data-bbox="1346 213 2078 501"> <tr> <td data-bbox="1346 213 1503 501"><b>WFZ-P1</b></td> <td data-bbox="1503 213 2078 501"> <p><b>Enabled activities</b></p> <p><i>Enable a range and diversity of activities that support the role and function of the Waterfront Zone and enhance the Zone’s vitality, vibrancy and amenity during the day and night, including:</i></p> <p>...</p> <p><i>8. Residential activities and supported residential care activities above ground floor.</i></p> </td> </tr> </table> <p data-bbox="1296 549 2051 655">7. If Council are to retain the “supported residential care activity” definition, then amend the land use activity rule framework for the Waterfront Zone to include a permitted rule applying to “supported residential care activities” as follows:</p> <table border="1" data-bbox="1346 671 2078 1388"> <tr> <td data-bbox="1346 671 1503 1388"></td> <td data-bbox="1503 671 2078 1388"> <p><b>WFZ-RX</b>      <b><u>Supported residential care activities</u></b></p> <p><b>1. Activity status: <u>Permitted</u></b></p> <p><u>Where:</u></p> <p><i>a. The maximum occupancy does not exceed 10 residents; and</i></p> <p><i>b. The activity is located above ground floor level.</i></p> <p><u>Cross-reference – also refer to NOISE-R5 and NOISE-S4 for noise-sensitive controls near the Port Zone.</u></p> <p><b>2. Activity status: <u>Restricted Discretionary</u></b></p> <p><u>Where:</u></p> <p><i>a. Compliance with the requirements of WFZ-RX.1.a cannot be achieved.</i></p> <p><u>Matters of discretion are:</u></p> <p><i>1. The extent to which the intensity and scale of the activity may adversely impact on the amenity values of nearby residential properties and the surrounding neighbourhood.</i></p> <p><u>Notification status: An application for resource consent made in respect of rule WFZ-RX.2.a is precluded from being publicly notified.</u></p> </td> </tr> </table>	<b>WFZ-P1</b>	<p><b>Enabled activities</b></p> <p><i>Enable a range and diversity of activities that support the role and function of the Waterfront Zone and enhance the Zone’s vitality, vibrancy and amenity during the day and night, including:</i></p> <p>...</p> <p><i>8. Residential activities and supported residential care activities above ground floor.</i></p>		<p><b>WFZ-RX</b>      <b><u>Supported residential care activities</u></b></p> <p><b>1. Activity status: <u>Permitted</u></b></p> <p><u>Where:</u></p> <p><i>a. The maximum occupancy does not exceed 10 residents; and</i></p> <p><i>b. The activity is located above ground floor level.</i></p> <p><u>Cross-reference – also refer to NOISE-R5 and NOISE-S4 for noise-sensitive controls near the Port Zone.</u></p> <p><b>2. Activity status: <u>Restricted Discretionary</u></b></p> <p><u>Where:</u></p> <p><i>a. Compliance with the requirements of WFZ-RX.1.a cannot be achieved.</i></p> <p><u>Matters of discretion are:</u></p> <p><i>1. The extent to which the intensity and scale of the activity may adversely impact on the amenity values of nearby residential properties and the surrounding neighbourhood.</i></p> <p><u>Notification status: An application for resource consent made in respect of rule WFZ-RX.2.a is precluded from being publicly notified.</u></p>
<b>WFZ-P1</b>	<p><b>Enabled activities</b></p> <p><i>Enable a range and diversity of activities that support the role and function of the Waterfront Zone and enhance the Zone’s vitality, vibrancy and amenity during the day and night, including:</i></p> <p>...</p> <p><i>8. Residential activities and supported residential care activities above ground floor.</i></p>					
	<p><b>WFZ-RX</b>      <b><u>Supported residential care activities</u></b></p> <p><b>1. Activity status: <u>Permitted</u></b></p> <p><u>Where:</u></p> <p><i>a. The maximum occupancy does not exceed 10 residents; and</i></p> <p><i>b. The activity is located above ground floor level.</i></p> <p><u>Cross-reference – also refer to NOISE-R5 and NOISE-S4 for noise-sensitive controls near the Port Zone.</u></p> <p><b>2. Activity status: <u>Restricted Discretionary</u></b></p> <p><u>Where:</u></p> <p><i>a. Compliance with the requirements of WFZ-RX.1.a cannot be achieved.</i></p> <p><u>Matters of discretion are:</u></p> <p><i>1. The extent to which the intensity and scale of the activity may adversely impact on the amenity values of nearby residential properties and the surrounding neighbourhood.</i></p> <p><u>Notification status: An application for resource consent made in respect of rule WFZ-RX.2.a is precluded from being publicly notified.</u></p>					

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		<div style="background-color: red; width: 20px; height: 100%; display: inline-block;"></div> <p><b>3. Activity status: <u>Non-complying</u></b></p> <p><i>Where:</i></p> <p><u>a. Compliance with the requirements of WFZ-RX.1.b cannot be achieved.</u></p>																		
<p>Part 3 – Area-Specific Matters / Zones / Special Purpose</p> <p>Corrections Zone</p>	<p><b>Support in part</b></p> <p>Ara Poutama requests that the provisions of the Corrections Zone are retained as they are current drafted.</p> <p>The Corrections Zone, in conjunction with the Arohata Prison designation, provides an appropriate planning framework to enable the continued operation and development of Arohata Prison (including both custodial and non-custodial activities).</p> <p>Ara Poutama’s position is that the definition of “residential activity” entirely captures supported and transitional accommodation activities, such as those provided for by Ara Poutama; i.e. people living in a residential situation, who are subject to support and/or supervision by Ara Poutama, and therefore a separate definition of “supported residential care activities” is unnecessary.</p> <p>However, if Council are to retain the definition of “supported residential care activity” then there is a minor drafting error within Policy CORZ-P2 and Rule CORZ-R4, whereby “supported residential care <i>accommodation</i>” is referenced; this needs to be amended to reflect the terminology otherwise proposed in the PDP definition (i.e. “supported residential care <i>activities</i>”).</p>	<p>1. Retain the Corrections Zone.</p> <p>2. If Council are to retain the “supported residential care activity” definition, then amend the minor drafting error under Policy CORZ-P2 as follows:</p> <table border="1" data-bbox="1346 520 2078 778"> <tr> <td style="background-color: #cccccc;"><b>CORZ-P2</b></td> <td><b>Compatible activities</b></td> </tr> <tr> <td></td> <td><i>Provide for activities that are compatible with the purpose and function of the Corrections Zone, including:</i></td> </tr> <tr> <td></td> <td>...</td> </tr> <tr> <td></td> <td><b>4. Supported residential care <del>accommodation</del> activities.</b></td> </tr> </table> <p>3. If Council are to retain the “supported residential care activity” definition, then amend the minor drafting error under Rule CORZ-R4 as follows:</p> <table border="1" data-bbox="1346 922 2078 1257"> <tr> <td style="background-color: #cccccc;"><b>CORZ-R4</b></td> <td><b>Supported residential care <del>accommodation</del> activities</b></td> </tr> <tr> <td style="background-color: #92d050;"></td> <td><b>1. Activity status: <u>Permitted</u></b></td> </tr> <tr> <td></td> <td><i>Where:</i></td> </tr> <tr> <td></td> <td><i>a. The maximum number of residents to be accommodated at any one time is 30; and</i></td> </tr> <tr> <td></td> <td><i>b. No more than five supported residential care <del>accommodation</del> activity buildings are to be located within the Corrections Zone.</i></td> </tr> </table>	<b>CORZ-P2</b>	<b>Compatible activities</b>		<i>Provide for activities that are compatible with the purpose and function of the Corrections Zone, including:</i>		...		<b>4. Supported residential care <del>accommodation</del> activities.</b>	<b>CORZ-R4</b>	<b>Supported residential care <del>accommodation</del> activities</b>		<b>1. Activity status: <u>Permitted</u></b>		<i>Where:</i>		<i>a. The maximum number of residents to be accommodated at any one time is 30; and</i>		<i>b. No more than five supported residential care <del>accommodation</del> activity buildings are to be located within the Corrections Zone.</i>
<b>CORZ-P2</b>	<b>Compatible activities</b>																			
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	<b>4. Supported residential care <del>accommodation</del> activities.</b>																			
<b>CORZ-R4</b>	<b>Supported residential care <del>accommodation</del> activities</b>																			
	<b>1. Activity status: <u>Permitted</u></b>																			
	<i>Where:</i>																			
	<i>a. The maximum number of residents to be accommodated at any one time is 30; and</i>																			
	<i>b. No more than five supported residential care <del>accommodation</del> activity buildings are to be located within the Corrections Zone.</i>																			
<p>Part 3 – Area-Specific Matters / Designations / MCOR – Minister of Corrections</p> <p>Wellington Prison and</p>	<p><b>Support</b></p> <p>Ara Poutama requests that the two designations within the PDP where the Minister of Corrections is the Requiring Authority are retained, which includes:</p>	<p>1. Retain designations MCOR1 and MCOR2.</p>																		

PDP Provision	Submission	Relief Sought (additions shown in <u>underline</u> , deletions shown in <del>strikethrough</del> )
Arohata Prison designations	<ul style="list-style-type: none"> <li>• Wellington Prison – Mt Crawford (MCOR1); and</li> <li>• Arohata Prison – Tawa (MCOR2).</li> </ul> <p>These designations have been rolled over from the Operative District Plan, and are an appropriate planning mechanism for managing these custodial corrections facilities. Noting however that Wellington Prison is no longer operational and designation MCOR1 will be uplifted at the time that the property ownership transfer has been confirmed.</p>	
Zone Maps	<p><b>Neutral</b></p> <p>Ara Poutama requests that the height limits as proposed to apply the properties on the southern side of Sunrise Boulevard, Tawa (which is adjacent to the northern boundary of the Arohata Prison site, as shown in the excerpt below from the PDP zone maps), are retained. These include the following proposed height limits:</p> <ul style="list-style-type: none"> <li>• Medium Density Residential Zone = 11m (see in yellow in excerpt below)</li> <li>• High Density Residential Zone = 21m (see in orange in excerpt below)</li> </ul> <p>Ara Poutama would be opposed to any increase/s in height along that boundary, beyond that currently proposed.</p> <p>It is imperative that proposed height increases do not create the opportunity for a breach in security, for example enabling contraband to be thrown over fences into the Arohata Prison facility. It is also important that the operational facility is not subject to reverse sensitivity issues, such as privacy and amenity of adjacent multi-level residential developments that could see into the prison.</p>	<ol style="list-style-type: none"> <li>1. Retain the 11m and 21m height limits as proposed to apply the properties on the southern side of Sunrise Boulevard, Tawa.</li> </ol>



PDP Provision	Submission	Relief Sought (additions shown in <u>underline</u> , deletions shown in <del>strikethrough</del> )
	 <p data-bbox="495 416 689 533">Retain the 11m height limit applicable to these properties</p> <p data-bbox="913 459 1234 533">Retain the 21m height limit applicable to these properties</p> <p data-bbox="712 592 943 639">Arohata Prison site</p> <p data-bbox="465 692 741 719"><b>Excerpt: PDP Zone Map</b></p>	