

Wellington City Proposed District Plan

Stream 2 – Part 3, Residential Zones – Part 1: Overview and General Matters

Section 42A of the Resource Management Act 1991

Document Information

REPORT FOR:

Independent Hearings Commissioners:

Trevor Robinson (Chair)
Liz Burge
Heike Lutz
David McMahon

SUBJECT:

Wellington City Proposed District Plan –

- 1.** Part 3 – Residential Zones
 - High Density Residential Zone
 - Medium Density Residential Zone
 - Character Precincts
 - Large Lot Residential Zone

- 2.** Residential Design Guide
 - Character Precincts
 - Mount Victoria North
 - Papakāinga Design Guide

PREPARED BY:

Josh Patterson

REPORT DATED:

1 March 2023

DATE OF HEARING:

28 March 2023 – 11 April 2023

For Council use only:

Version Number	Author	Peer Reviewer	Date
Version 1	Josh Patterson	Greg Vossler	1 March 2023

Executive Summary

- i. This report considers submissions received by Wellington City Council in relation to the relevant objectives, policies, rules, definitions, appendices (including Design Guides), and maps of the Wellington City Proposed District Plan as they apply to the residential chapters in the Proposed District Plan, being the:
 - High Density Residential Zone
 - Medium Density Residential Zone, including the Character Precincts
 - Large Lot Residential Zone
 - Residential Design Guides, including the Papakāinga and Mt Victoria North Design Guides
- ii. There were a significant number of submissions and further submissions received in relation to these parts of the Proposed District Plan. The submissions received were diverse and sought a range of outcomes. This report outlines recommendations in response to the issues that have emerged from these submissions.
- iii. The following are considered to be the key issues in contention with respect to the residential zones:
 - a. The suitability of the objectives, policies, rules and standards in each residential zone chapters;
 - b. The suitability of different Wellington suburbs for residential intensification;
 - c. The extent of the Character Precincts;
 - d. The value and suitability of the Residential Design Guide.
- iv. This report addresses each of these key issues, as well as any other relevant issues raised in the submissions. As the topic encompass three separate chapters in the Proposed District Plan, as well as the Residential Design Guide and its components, the report is split into six sections for ease of reading.
- v. Appendix A of this report sets out the recommended changes to the various residential chapters in full. These recommendations take into account all of the relevant matters raised in submissions and relevant statutory and non-statutory documents.
- vi. The residential chapters will also subject to a number of consequential amendments arising from submissions to the whole of the Proposed District Plan and other chapters.
- vii. For the reasons set out in the Section 32AA evaluation included throughout this report, the proposed objectives and associated provisions, with the recommended amendments, are considered to be the most appropriate means to:
 - a. Achieve the purpose of the Resource Management Act 1991 (RMA) where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives, and
 - b. Achieve the relevant objectives of the Proposed District Plan, in respect to the proposed provisions.

Contents

Document Information	2
Executive Summary.....	3
Contents	Error! Bookmark not defined.
Interpretation	6
Table 1: Abbreviations	6
Part 1 – Overview and General Matters.....	8
1.0 Introduction	8
1.1 Purpose of the Section 42A Report	8
1.2 Author and Qualifications	9
1.3 Code of Conduct	10
1.4 Supporting Evidence	10
2.0 Key resource management issues in contention.....	10
3.0 Procedural Matters.....	11
4.0 Background and Statutory Considerations.....	11
4.1 Resource Management Act 1991.....	11
4.2 Schedule 1 and ISPP.....	12
4.3 Section 32AA.....	12
4.4 Trade Competition.....	13
5.0 Consideration of Submissions and Further Submissions	13
5.1 Overview	13
5.2 Report Structure	14
5.3 Format for Consideration of Submissions	15
6.0 General Submissions on the Part 3 - Residential Zones.....	15
6.1 General Matters	15
6.2 Definitions	17
6.3 General Points on Intensification	18
6.4 General Points on Design and Active Transport.....	21
6.5 General Points on Sunlight and Shading	24
6.6 General Points on Boundary Setbacks	26
6.7 General Points on Height and Height in Relation to Boundary.....	27
6.8 General Points on Outdoor Space	29
6.9 General Points on Accessibility	30
6.10 General Points on Notification	31
6.11 General Points on the Planning for Residential Amenity Report.....	32
6.12 General Points on Reverse Sensitivity.....	33
6.13 General Points on Educational Precincts	33

6.14	General Points on Mt Cook	34
6.15	General Points on Newtown	34
6.16	General Points on Aro Valley.....	36
7.0	Summary of Further Submissions	36
8.0	Minor and Inconsequential Amendments	38
9.0	Conclusion	39
10.0	Recommendations	39

Interpretation

Table 1: Abbreviations

Abbreviation	Means
the Act / the RMA	Resource Management Act 1991
the Enabling Act	Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021
the Council	Wellington City Council
the Operative Plan/ODP	Operative Wellington City District Plan
the Proposed Plan/PDP	Proposed Wellington City District Plan
GWRC	Greater Wellington Regional Council
HRZ	High Density Residential Zone
LLRZ	Large Lot Residential Zone
MRZ	Medium Density Residential Zone
MVNT Precinct	Mount Victoria North Townscape Precinct
NES	National Environmental Standard
NES-AQ	National Environmental Standards for Air Quality 2004
NES-CS	National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
NES-ETA	National Environmental Standards for Electricity Transmission Activities 2009
NES-FW	National Environmental Standards for Freshwater 2020
NES-MA	National Environmental Standards for Marine Aquaculture 2020
NES-PF	National Environmental Standards for Plantation Forestry 2017
NES--SDW	National Environmental Standards for Sources of Drinking Water 2007
NESTF	National Environmental Standards for Telecommunication Facilities 2016
NPS	National Policy Statement
NPS-ET	National Policy Statement on Electricity Transmission 2008
NPS-FM	National Policy Statement for Freshwater Management 2020
NPS-UD	National Policy Statement on Urban Development 2020
NPS-REG	National Policy Statement for Renewable Electricity Generation 2011
NZCPS	New Zealand Coastal Policy Statement 2010
PNRP	Proposed Wellington Natural Resources Plan (Decisions Version) 2019
RDG	Residential Design Guide
RPS	Wellington Regional Policy Statement 2013
Spatial Plan	Spatial Plan for Wellington City 2021
S32	Section 32 of the Resource Management Act 1991
S32AA	Section 32AA of the Resource Management Act 1991

Table 2: Abbreviations of Submitters' Names

Abbreviation	Means
Dept of Corrections	Ara Poutama Aotearoa the Department of Corrections
DOC	Department of Conservation Te Papa Atawhai
FENZ	Fire and Emergency New Zealand
Foodstuffs	Foodstuffs North Island Limited
Forest and Bird	Royal Forest and Bird Protection Society
GWRC	Greater Wellington Regional Council
Harvey Norman	Harvey Norman Properties (N.Z.) Limited
Heritage NZ	Heritage New Zealand Pouhere Taonga
House Movers Association	House Movers section of the New Zealand Heavy Haulage Association Inc
HPW	Historic Places Wellington
KiwiRail	KiwiRail Holdings Limited
NZDF	New Zealand Defence Force
Oil companies	Z Energy, BP Oil NZ Ltd and Mobil Oil NZ Limited
Oranga Tamariki	Oranga Tamariki – Ministry of Children
QEII	Queen Elizabeth the Second National Trust
RNZ	Radio New Zealand
Survey+Spatial	Survey+Spatial New Zealand (Wellington Branch)
Telco	Spark New Zealand Trading Limited, Chorus New Zealand Limited, Vodafone New Zealand Limited
Transpower	Transpower New Zealand Ltd
TROTR	Te Rūnanga o Toa Rangatira
Waka Kotahi	Waka Kotahi NZ Transport Agency
WCCT	Wellington's Character Charitable Trust
WE	Wellington Electricity Lines Limited
Woolworths	Woolworths New Zealand Limited

In addition, references to submissions includes further submissions, unless otherwise stated.

Part 1 – Overview and General Matters

1.0 Introduction

1.1 Purpose of the Section 42A Report

1. In accordance with section 42A of the Resource Management Act 1991 (the **RMA**) I have prepared this report to:
 - a. Assist the Hearings Panel in their role as Independent Commissioners in making their decisions on the submissions and further submissions on the Wellington City Proposed District Plan (the **PDP**); and
 - b. Provide submitters with information on how their submissions have been evaluated and the recommendations made by officers, prior to the hearing.

2. This S42A report relates to Hearing Stream 2 – Residential Zones. The report is separated into the following sections:
 - Part 1: Overview and General Matters
 - Part 2: High Density Residential Zone (**HRZ**)
 - Part 3: Medium Density Residential Zone (**MRZ, MRZ-PREC-03**)
 - Part 4: Character Precincts (**MRZ-PREC-01, MRZ-PREC-02**), including:
 - o Character Precincts (**MRZ-PREC-01**)
 - o Mt Victoria North Townscape Precinct (**MRZ-PREC-02**)
 - o Character Precinct Design Guide
 - o Mt Victoria North Townscape Precinct Design Guide
 - Part 5: Large Lot Residential Zone (**LLRZ**)
 - Part 6: Design Guides
 - o General Design Guide content
 - o Residential Design Guide (**RDG**)
 - o Papakāinga Design Guide
 - Appendices
 - o Appendix A: Recommended amendments to provisions (tracked)
 - o Appendix B: Recommended responses to submissions and further submissions (tables)
 - Expert Evidence
 - o Dr Farzad Zamani
 - o Ms Shayna Curle

3. Within the abovementioned parts of the S42A report, I consider submissions and further submissions received by the Council in relation to general issues relating to the residential zones, along with relevant objectives, policies, rules, definitions as they apply to each specific zone, and the Residential Design Guide. Where necessary, other parts of the PDP have been addressed in this report.

4. Within the body of Sections 1 to 6 of this S42A report, and the associated tables provided at Appendix 2, officers make recommendations as to whether or not submissions should be accepted or rejected; along with conclusions and recommendations for changes to the PDP provisions or maps based on the assessment and evaluation contained in the report.
5. This report comprises Part 1 – Overview and General Matters. It sets out contextual and procedural matters before addressing general submission points relating to the residential zones.
6. This report is intended to be read in conjunction with the Section 42A Assessment Report: Part A – Overview, which sets out the statutory context, background information and administrative matters pertaining to the District Plan review and PDP.
7. The Hearings Panel may choose to accept or reject the conclusions and recommendations of this report, or may come to different conclusions and make different recommendations, based on the information and evidence provided to them by submitters.

1.2 Author and Qualifications

8. My full name is Josh Patterson. I am a Principal Advisor in the District Planning Team at Wellington City Council (the Council).
9. I hold the qualification of Bachelor of Science (Geography and Development Studies) from Victoria University and a Master of Resource and Environmental Planning from Massey University.
10. I have seven years' experience in planning and resource management. I began my career at the Council before moving to the private sector, returning to the Council in October 2022. Before leaving the Council initially, I worked in District Planning Team where I was a lead on the preparation of the first Housing and Business Capacity Assessment. Additionally, I was lead on the review of several chapters, including the Heritage Chapter. I then worked at Urban Edge Planning for three years where I was the lead and support planner on Private Plan Changes and District Plan changes, including for the Wellington City Council. In addition, I prepared and assessed resource consent applications for a range of developments across the Wellington region. With respect to the PDP, I was involved in drafting the Natural Environment Chapters and was the lead on the Signs and Large Lot Residential Chapters.
11. Since joining the District Plan Team in October 2022 my primary focus has been assessing and reporting on the submissions relating to the Part 3 – Residential Zones. I note that I will also be the reporting officer on the Signs, Public Access, and Coastal Environment Chapters and will appear at later hearing streams in relation to these matters.
12. My role in preparing this report is that of an expert in planning.
13. I have prepared the bulk of this S42A report, with assistance from Mr Mitch Lewandowski, who has prepared the assessment in relation to the MRZ character provisions (ie MRZ-PREC-01 and

MRZ-PREC-02). Mr Lewandowski has provided details of his qualifications and expertise in the section of the S42A report titled 'Part 4: Character Precincts'.

1.3 Code of Conduct

14. Although this is a Council Hearing, I have read the Code of Conduct for Expert Witnesses contained in the Practice Note issued by the Environment Court, which came into effect on 1 January 2023. I have complied with the Code of Conduct when preparing my written statement of evidence and I agree to comply with it when I give any oral evidence.
15. Other than when I state that I am relying on the evidence or advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.
16. Any data, information, facts, and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. Where I have set out opinions in my evidence, I have given reasons for those opinions.

1.4 Supporting Evidence

17. The expert evidence, literature, legal cases or other material which I have used or relied upon in support of the opinions expressed in this report is as follows:
 - a. Mr Lewandowski, with respect to the MRZ-PREC-01 and MRZ-PREC-03 provisions;
 - b. Statement of Evidence by Dr Farzad Zamani, Manager Urban Regeneration and Design;
 - c. Statement of Evidence by Shayna Curle, Māori Design Advisor.

2.0 Key resource management issues in contention

18. The submissions and further submission points received in relation to the HRZ, MRZ, Character Precincts, LLRZ and Residential Design Guide are addressed in detail at Parts 2 to 6 of this S42A Report respectively, with general submission points details later in this Part 1 report.
19. Key topics arising in the submissions and further submissions were:
 - a. The suitability of the objectives, policies, rules and standards in each residential zone chapters;
 - b. The suitability of different Wellington suburbs for residential intensification;
 - c. The extent of the residential zones;
 - d. The extent of the Character Precincts;
 - e. The value and suitability of the Residential Design Guide.
20. There are a number of matters not in contention or needing further consideration, for example where no submissions were received in relation to an objective, policy, rule or standard. The matters not in contention in each chapter are listed in the relevant section of this S42A report. I recommend that these matters are adopted as notified and no further consideration of them is required.

3.0 Procedural Matters

21. At the time of writing this report there been any pre-hearing conferences, clause 8AA meetings or expert witness conferencing in relation to submissions on any residential provisions, including the Residential Design Guide.
22. It is noted that many submissions relate to matters that will be addressed in later hearing streams. Where a submission point is included in the summary tables for the residential zones and /or design guides but would be more suitable to assess under later streams, this has been noted in the relevant table. Likewise, if submission points have been addressed in Stream 1 (for example definitions), this has been noted.

4.0 Background and Statutory Considerations

4.1 Resource Management Act 1991

23. The PDP has been prepared in accordance with the RMA and in particular, the requirements of:
 - Section 74 Matters to be considered by territorial authority, and
 - Section 75 Contents of district plans.
24. As set out in Section 32 Evaluation Report Part 1 – Context to Evaluation and Strategic Objectives, there are a number of higher order planning documents and strategic plans that provide direction and guidance for the preparation and content of the PDP. This report details all relevant consultation and includes a comprehensive assessment of all statutory considerations considered prior to public notification of the PDP. In addition to the Part 1 report, the following Section 32 Evaluation Reports are relevant to the residential provisions that will be addressed in this S42A report:

[Section 32 - Part 2 - High Density and Medium Density Residential Zones \(wellington.govt.nz\)](#)
[Section 32 report - Part 2 - Character Precincts and the Mount Victoria North Townscape Precinct \(wellington.govt.nz\)](#)
[Section 32 - Part 2 - Large Lot Residential Zone \(wellington.govt.nz\)](#)
25. Since public notification of the PDP and publishing of the related section 32 evaluation reports on 18th July 2022, the following relevant statutory considerations have changed/been Since public notification of the plan and publishing of the related section 32 evaluation reports on 18th July 2022, the following relevant statutory considerations have changed/been introduced:
 - a. **A new National Policy Statement for Highly Productive Land (NPS-HPL) was gazetted (20.09.2022).**
 - Wellington City has no highly productive land. There are no implications for the plan as a result.
 - b. **The Spatial Planning Bill and Natural and Built Environment Bill were introduced to Parliament and have been referred to Select Committees (14.11.2022).**
 - These Bills are currently before the select committee and have no implications for the plan.

c. Plan Change 1 to the Wellington Regional Policy Statement was notified (19.08.2022).

- A submission was received from the Wellington Regional Council seeking amendments to the plan, in part to achieve alignment with its notified Plan Change. Submission points that relate to the chapters and matters of this s42a report are addressed here. Other submission points are addressed in the relevant s42 report.

4.2 Schedule 1 and ISPP

26. As detailed earlier in the section 42A Overview Report, the Council has chosen to use two plan review processes:
- a. The Intensification Streamlined Planning Process (ISPP) under Part 6 of Schedule 1 of the RMA for the intensification planning instrument (IPI). There are no appeal rights on ISPP provisions.
 - b. For all other PDP provisions and content, Part 1 of Schedule 1 process is used. Part 1 Schedule 1 provisions can be appealed.
27. The PDP is annotated with provisions that are to be assessed under the ISPP and the Part 1 Schedule 1 process. For this topic, the following provisions fall under the ISPP.
- a. High Density Residential Zone
 - b. Medium Density Residential Zone
 - c. Residential Design Guide

And the following provisions fall under the Part 1 Schedule 1 process:

- a. Large Lot Residential Zone
- b. Papakāinga Design Guide (noting this is a non-statutory design guide)

4.3 Section 32AA

28. I have undertaken an evaluation of the recommended amendments to provisions since the initial section 32 evaluation was undertaken in accordance with s32AA. Section 32AA states:

32AA Requirements for undertaking and publishing further evaluations

(1) A further evaluation required under this Act—

(a) is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (the changes); and

(b) must be undertaken in accordance with section 32(1) to (4); and

(c) must, despite paragraph (b) and section 32(1)(c), be undertaken at a level of detail that corresponds to the scale and significance of the changes; and

(d) must—

(i) be published in an evaluation report that is made available for public inspection at the same time as the approved proposal (in the case of a national policy statement or a New Zealand coastal policy statement or a national planning standard), or the decision on the proposal, is notified; or

(ii) be referred to in the decision-making record in sufficient detail to demonstrate that the further evaluation was undertaken in accordance with this section.

(2) To avoid doubt, an evaluation report does not have to be prepared if a further evaluation is undertaken in accordance with subsection (1)(d)(ii).

29. The required section 32AA evaluations for changes proposed as a result of consideration of submissions are contained within the assessments provided in relation to submissions on the separate residential zones. These evaluations are provided at the relevant sections of this S42A report, as required by s32AA(1)(d)(ii).
30. The Section 32AA further evaluation contains a level of detail that corresponds to the scale and significance of the anticipated effects of the changes that have been made. Recommendations on editorial, minor, and consequential changes that improve the effectiveness of provisions without changing the policy approach are not re-evaluated. No re-evaluation has been undertaken if the amendments have not altered the policy approach.
31. For changes that represent a significant departure from the PDP as notified, I have undertaken the s32AA evaluation within the report in the same location as a recommendation.

4.4 Trade Competition

32. Trade competition is not considered relevant to the provisions of the PDP relating to this topic.
33. There are no known trade competition issues raised within the submissions.

5.0 Consideration of Submissions and Further Submissions

5.1 Overview

34. In total, there were 3231 submission points in relation to the Part 3 – Residential Zones, including general submission points on the residential zones, zone-specific submissions. There were an additional 451 submission points in relation to the Residential Design Guides [including the Mount Victoria North Design Guide and Papakāinga Design Guide].
35. There were 1327 further submission points on the residential zones provisions and 137 further submission points on the design guide provisions.
36. A table showing the breakdown of submissions in relation to all residential provisions is provided at Appendix 1 to this S42A report (Part 1: Overview and General Matters), with further details provided in Parts 2 to 6.
37. These submissions are addressed in separate sections of this S42A report as follows:
 - Part 1: General points relating to the residential chapters
 - Part 2: High Density Residential Zone (**HRZ**)
 - Part 3: Medium Density Residential Zone (**MRZ, MRZ-PREC-03**)
 - Part 4: Character Precincts (**MRZ-PREC-01, MRZ-PREC-02**), including:

- Character Precincts (**MRZ-PREC-01**)
- Mt Victoria North Townscape Precinct (**MRZ-PREC-02**)
- Character Precinct Design Guide
- Mt Victoria North Townscape Precinct Design Guide
- Part 5: Large Lot Residential Zone (**LLRZ**)
- Part 6: Design Guides
 - General Design Guide content
 - Residential Design Guide (**RDG**)
 - Papakāinga Design Guide

38. I note that submissions relating to sections of the PDP that will be considered in later hearing streams are not considered in this S42A report. Notably, the following matters will not be addressed in detail in this report:
- Walkable catchments
 - Transport, including micromobility
 - Three Waters, including permeability
 - Natural Environment Layers, including significant natural areas

5.2 Report Structure

39. Submissions have raised a number of issues that have been grouped into sub-topics within the applicable parts of this S42A report. Some of the submissions are addressed under a number of topic headings based on the topics contained in the submission. In conjunction with Mr Lewandowski (with respect to the character provisions), I have considered substantive commentary on primary submissions contained in further submissions as part of my consideration of the primary submissions to which they relate.
40. Due to the number of submission points, this evaluation is generic only and may not contain specific recommendations on each submission point, but instead discusses the issues generally. This approach is consistent with Clause 10(2)(a) of Schedule 1 to the RMA. Specific recommendations on each submission / further submission point are contained in Appendix B.
41. Recommended amendments are contained in the following appendices:
- a. Appendix A – Recommended Amendments to the Residential Chapters
 - b. Appendix B – Recommended Responses to Submissions and Further Submissions on the Residential Chapters.
42. Additional information can also be obtained from the Summary of Submissions for the Residential Chapters, the applicable Section 32 Reports, and the overlays and maps on the ePlan.
43. The following evaluation should be read in conjunction with the summaries of submissions and further submissions, and the submissions themselves. Where I agree with the relief sought and the rationale for that relief, I have noted my agreement, and my recommendation is provided in the summary of submission table in Appendix B. Where I have undertaken further evaluation of the relief sought in a submission(s), the evaluation and recommendations are set out in the body of this report. I have provided ‘track changes’ versions of the HRZ, MRZ, LLRZ chapters and

relevant Design Guides with my recommended amendments in response to submissions as Appendix A.

44. This report only addresses definitions that are specific to the Residential provisions in the PDP. Definitions that relate to more than one topic have been addressed in Hearing Stream 1 and the associated section 42A report.

5.3 Format for Consideration of Submissions

45. For each identified topic, the consideration of submissions has been undertaken in the following format:

- Matters raised by submitters;
- Assessment; and
- Summary of recommendations.

46. As noted above, the recommended amendments to the relevant parts of the PDP are set out in Appendix 1 of this report where all text changes are shown in a consolidated manner.

47. Where necessary, for example where I have recommended a significant departure from the notified PDP provisions, I have undertaken a s32AA evaluation in respect to the recommended amendments in my assessment.

6.0 General Submissions on the Part 3 - Residential Zones

6.1 General Matters

Matters raised by submitters

48. James Barber [56.2] supports the residential intensification enabled in the residential zones.
49. Interprofessional Trust [96.3] seeks that the PDP is amended to follow international best practice with respect to medium density housing.
50. Amos Mann [172.16] seeks that the PDP empowers the development of a wide range of diverse and varied housing types in all residential zones, including co-housing, tiny housing, and Papakāinga projects.
51. Inner City Wellington [352.4] considers the PDP may not be able to directly influence and improve diversity of inner city neighbourhoods.
52. Phillippa O'Connor [289.14] seeks that the Restricted Discretionary activity status that applies where a standard is breached is retained.
53. Richard Murcott [322.4] considers that the Council should recognise the value of the inner-city suburbs, which has been achieved through the implementation of the pre-1930s demolition rule

in the ODP, rather than jeopardising the gains that have been made over the last 20 years in these relatively small enclaves of the city.

54. Mt Victoria Residents' Association [342.14] considers that the PDP encourages gentrification and the imminent moving on of more vulnerable residents from Mt Victoria.
55. Mt Victoria Residents' Association [342.7 (supported by Lower Kelburn Neighbourhood Group FS123.38)] considers that the PDP leaves much of the city's environment vulnerable to demolition with no guarantee of quality and/or affordable development in its place.
56. Kāinga Ora [391.309] seeks that where residential zone standards are not referenced in building and structure activity rules, a Restricted Discretionary activity status is provided for non-compliance with the standard, to be consistent with the general approach throughout the PDP.
57. Lorraine and Richard Smith [230.12] seek that well-functioning older housing should be retained as much as possible to avoid landfill waste and reduce carbon emissions.
58. Lorraine and Richard Smith [230.7] seek that the PDP ensure that current well-functioning established homes, neighbourhoods, old trees and plantings are not demolished.
59. Kay Larsen [447.2] considers that it seems impossible to imagine allowing developers to demolish existing houses without public notification so that the local community can work together to improve the neighbourhood.
60. Kāinga Ora [391.308 (opposed by Onslow Residents Community Association FS80.22 and Greater Wellington Regional Council FS84.29)] seeks that residential intensification provisions in the MRZ and HRZ are reviewed to improve national and regional consistency and increase density and heights across the board.
61. Generation Zero Inc. [254.3] seeks the ability to make a further submission on the point on the assessment of the impacts of limiting development capacity through qualifying matters, when the assessment is available.
62. Rowan Hannah [84.1] is concerned about the hill tops and ridgeline area, noting the proposed changes will dramatically change the look and feel of the area. They are also concerned about the proposed density.

Assessment

63. Regarding the submission point of Interprofessional Trust [96.3], the residential chapters of the PDP are in large part guided by national direction, with the Residential Design Guide reflecting best practice.
64. In response to the submission point of Amos Mann [172.16], matters raised are considered to be provided for through the PDP.

65. No specific decisions have been requested in relation to submission points from Inner City Wellington [352.4], Richard Murcott [322.4], Mt Victoria Residents' Association [342.14], Mt Victoria Residents' Association [342.7 (supported by Lower Kelburn Neighbourhood Group FS123.38)]. These points have been noted.
66. In relation to Kāinga Ora's [391.309] submission point relating to residential zone standards, it is considered that the PDP provides a clear activity status where a standard is not met.
67. In response to the submissions from Lorraine and Richard Smith [230.12 and 230.7] and Kay Larsen [447.2]. The PDP manages the demolition of pre-1930s buildings in Character Precincts through the MRZ-PREC-01 provisions, which is considered appropriate. In this respect I note that should the extent of the character precincts change, the area protected by MRZ-PREC-01 will also change. This is addressed further in the Part 3 – Character Precincts section of this S42A report.
68. In response to the submission points of Kāinga Ora [391.308 (opposed by Onslow Residents Community Association FS80.22 and Greater Wellington Regional Council FS84.29)] and Generation Zero Inc. [254.3], a general review and a further submission go beyond what can be undertaken through the current hearing process. For information, the report referred to by Generation Zero Inc. [254.3] is available [here](#).
69. In response to the submission of Rowan Hannah [84.1], which I have inferred is opposed to the level of intensification in the MRZ. The density standards are considered appropriate and in line with the MDRS.

Summary of recommendations

70. HS2-P1-Rec1: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to these general submission points on general submissions.
71. HS2-P1-Rec2: That submission points relating to 'General Submissions on General Matters' are accepted/rejected as detailed in Appendix B.

6.2 Definitions

Matters raised by submitters

72. The Retirement Villages Association [350.1] seeks that a new definition of 'Retirement Unit' be added to the PDP.
73. Envirowaste Services Ltd [373.1] seeks that a new definition of 'Organic Composting' be added to the PDP.
74. Envirowaste Services Ltd [373.2] seeks an amendment to the definition of 'Community Garden' to clarify whether community gardens should provide for composting up to a certain threshold in order to align with MRZ-P14.

75. Fire and Emergency New Zealand [273.4] support the definition of 'Accessory Building' as notified.
76. Anita Gude and Simon Terry [461.14] seeks that a definition of 'Townscape Values' is provided.

Assessment

77. In response to the submission point of Retirement Villages Association [350.1] to add a new definition of 'Retirement Unit', this issue has been addressed at Hearing Stream 1 (Part 1, Plan Wide Matters and Strategic Direction) and does not need further consideration at this point.
78. Regarding the submission point of Envirowaste Services Ltd [373.1] to add a new definition of 'Organic Composting', provisions for multi-unit housing in the MRZ and HRZ make reference to 'management, storage and collection of all waste, recycling and organic waste'. This is suitably clear and no further clarification or definition is required.
79. Regarding the submission point of Envirowaste Services Ltd [373.2], I do not consider it appropriate for a definition to provide a certain composting threshold.
80. In response to the submission from Anita Gude and Simon Terry [461.14], there is already a definition for 'townscape' which helps clarify values. In addition, the MRZ-PREC02 introduction explains why the values are important.

Summary of recommendations

81. HS2-P1-Rec3: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to definitions on general matters.
82. HS2-P1-Rec4: That submission points relating to 'Definitions on General Matters' are accepted/rejected as detailed in Appendix B.

6.3 General Points on Intensification

Matters raised by submitters

83. Matthew Gibbons [148.2] supports the PDP provisions that enable intensification, and considers there should be increased densification throughout Wellington, including in Character Precincts.
84. Wellington City Council Environmental Reference Group [377.318] is generally supportive of the proposals for the MRZ and HRZ. Minor suggestions have been made elsewhere in the submission.
85. Wellington Youth Council [201.12] seeks that the consenting process is improved to support in-fill developments, to overcome logistical and delay challenges.

86. Conor Hill [76.23 (opposed by Wellington's Character Charitable Trust FS82.54 and LIVE WELLington FS96.88)] considers that limiting dwellings is anti-people and seeks that the limit of three dwellings per site is deleted in every zone.
87. Inner City Wellington [352.2] considers that the current level of intensification already occurring is exacerbating the existing deficit in amenities available to inner-city residents living in 'vertical streets'.
88. Antony Kitchener and Simin Littschwager [199.7 and 199.8] seek that densification is distributed across the entire city and that six-storey buildings are not concentrated in Crofton Downs, Ngaio, and Khandallah, noting that the areas could benefit from some degree of densification but it needs to be executed well with constraints, or consideration for the impacts on the community.
89. Mary-Anne O'Rourke [195.3 and 195.4] considers that it is contradictory to permit building intensification in the Kilbirnie, Lyall Bay, and Miramar suburbs, which are flood and tsunami prone, when the Government is not willing to invest in transport infrastructure (light rail) in the area due to its environmental vulnerability. In addition, the ageing and unmaintained infrastructure will not tolerate this level of housing intensification.
90. Sue Kedgley [387.3 and 387.4 (supported by LIVE WELLington FS96.52 and FS96.53)] seeks densification focuses to the areas such as along Kent Terrace, Adelaide Road, Taranaki Street, Vivian Street and Te Aro flats. The submission seeks that densification focus on areas such as in the central city, where there are numerous vacant or under-utilised commercial buildings that could be converted and re-purposed into apartment blocks.
91. Johnsonville Community Association [429.28] seeks that the PDP focuses on increasing available residential accommodation close to the city centre.
92. Wellington's Character Charitable Trust [233.3] seeks that more mixed-use development is enabled in Vogeltown, Mornington, Kingston and Brooklyn.
93. Alan Fairless [242.12] seeks that the PDP sets out a clear sequence for intensification that focusses first on major areas of underutilised land and smaller groups of underutilised sites close to public transport, rather than upzoning broad areas of land. Alan Fairless [242.14] also seeks that the PDP identify areas suitable for intensification and provide a timetable for developing masterplans for these areas, including quality design guides and rapid assessment processes for sites within these areas.
94. Steve Dunn [288.5] seeks that an urban development plan, specific to the local area be developed as a refined response and would allow for intensive development in specific areas that consider the immediate surroundings, topography, local character, and ecology.
95. Jim and Christine Seymour [262.3] support more affordable and dense housing in central city areas, but not at the risk of losing established character areas.

96. Lorraine and Richard Smith [230.14] note that well-functioning, established and character housing, and neighbourhoods such as Lower Kelburn will be among the first to be demolished and irretrievably destroyed, not for the purpose of creating new affordable housing.
97. Tawa Community Board [294.15] is concerned about the transition edges between areas of differing permitted density not being addressed nor the effects of topography in Tawa.
98. Dale Mary McTavish [448.1] opposes recent examples of infill housing.
99. Matthew Plummer [300.3 and 300.4] considers that there is insufficient infrastructure to deliver the significant uplift in housing that Wellington needs and seeks that infrastructure development be incentivised on Adelaide Road, Cambridge Terrace and Kent Terrace.

Assessment

100. In response to the submission from Wellington Youth Council [201.12], the PDP is considered to provide for infill development.
101. In response to the submission point of [76.23 (opposed by Wellington's Character Charitable Trust FS82.54 and LIVE WELLington FS96.88)] regarding limiting dwellings, where three residential units are permitted on the site, additional units would require a resource consent.
102. Regarding submissions in relation to the level or location of intensification, this has been discussed in the S42A report for Hearing Stream 1 (Part 1, Plan Wide Matters and Strategic Direction). Walking catchment areas and associated rules enabling high density have been set through the Spatial Plan and the NPS-UD.
103. No specific decision has been requested in relation to submission points from Lorraine and Richard Smith [230.14], Tawa Community Board [294.15] and Dale Mary McTavish [448.1]. These points have been noted.
104. Matthew Plummer's [300.3 and 300.4] submission points relate to incentivising infrastructure. It is noted that proposed policies relating to multi-unit housing and retirement villages (for example MRZ-P6 and MRZ-P7) include a provision relating to being adequately services by three waters infrastructure.

Summary of recommendations

105. HS2-P1-Rec5: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to general matters on intensification.
106. HS2-P1-Rec6: That submission points relating to 'General Matters on Intensification' are accepted/rejected as detailed in Appendix B.

6.4 General Points on Design and Active Transport

Matters raised by submitters

107. Johnsonville Community Association [429.2] seeks an independent review of Plan Change 72 be undertaken to confirm whether the Council has successfully permitted 'density done well' developments.
108. James Coyle [307.7 and 307.8] considers that building typologies should not be mixed too much and considers that overshadowing and overlooking should be minimised.
109. Jane Szentivanyi and Ben Briggs [369.13] consider that building height in relation to boundary, outdoor living spaces, landscaped areas, permeable surface area, minimum residential unit size and setbacks from any boundary, especially the street facing boundary might impact neighbouring properties and reduce the adjacent street's amenity, vibrancy and safety.
110. Living Streets Aotearoa [482.46 and 482.51] seeks that new and altered multi-unit developments have good design that provides privacy and be insulated for noise and energy efficiency.
111. Anna Jackson [222.3 and 222.5] seeks addition of a 30-40% permeability standard for all sites and a requirement for consideration of waste management to be factored into planning.
112. Mt Victoria Residents' Association [342.9] seeks more rules on design density.
113. Living Streets Aotearoa [482.1 and 482.20] seeks a new provision requiring that significant developments that do not in themselves contribute to pedestrian amenity make a financial contribution towards that and that buildings are designed so as not to have blank walls and high and solid fences, or frontages dominated by spaces such as carparks.
114. Michael Harvey [38.1] seeks that "Sausage Flats" are actively discouraged through the MDRS in the PDP, in a similar fashion to Auckland City Council.
115. Property Council New Zealand [338.9] considers that residential standards meant for new apartments and townhouses to be pleasant places to live in could have unintended consequences if not worked closely with the sector.
116. Lorraine and Richard Smith [230.1] seek a new objective as follows: *'Reflect the essential contributions made by heritage, character and quality design, giving us the ability to remember our heritage and to visually enjoy unique urban landscapes which provide character and a sense of belonging to our unique city.'*
117. Alan Fairless [242.4] and Elizabeth Nagel [368.4] also seek that the PDP include an objective reflecting the positive contributions heritage, character and quality design, and the ability to read stories in the urban landscape, make to overall wellbeing.
118. Mt Victoria Residents' Association [342.24] seeks that minimum residential unit size standards include a measure of minimum floor space per person.

119. Mt Victoria Residents' Association [342.25] seeks that developments with oppressive street frontages be discouraged.
120. Kāinga Ora [391.310] (opposed by Onslow Residents Community Association [FS80.31]) seeks that standards are amended across the PDP to be proportionate to the building height changes sought in the submission. The submitter has noted that as a result of their amendments requested for height adjustments there may be consequential changes needed to other standards such as wind and daylight standards.
121. Donna Yule [421.1] opposes the blanket policy of medium density three-storey residential housing in all residential areas. The submission notes that the height limits are too high, and no consideration has been given to the geographical location of each suburb, the terrain and orientation to the sun.
122. Fire and Emergency New Zealand [273.2] considers that the PDP needs to adequately give appropriate consideration to fire safety and operational firefighting requirements, particularly in relation to housing development and fire station development, including adequate access and water supply for new developments, the ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies, and the ability to undertake training for firefighters within the region.
123. Living Streets Aotearoa [482.2] seeks that shortcuts have obvious exits and do not have high and solid property boundaries.
124. Braydon White [146.13] seeks that a new standard is added requiring that developments adequately accommodate active travel as the building users' first-best choice for accessing it.
125. Living Streets Aotearoa [482.49] seeks that new and altered multi-unit developments include storage and bike parking.
126. Bruce Crothers [319.3] and Joan Fitzgerald [323.1] seek that G99 to G102 (external bike storage) of the Residential Design Guide be referenced in the PDP rules, policies and objectives.
127. Antony Kitchener and Simin Littschwager [199.9] seek that the Council stipulates a certain percentage of newly built dwellings to be classed as 'affordable'.
128. Living Streets Aotearoa [482.52] seek that new and altered multi-unit developments be insulated for noise and energy efficiency.

Assessment

129. Regarding submissions in relation to design (429.2, 307.7, 307.8, 369.13, 482.46, 482.51, 342.9, 482.1, 482.20, 38.1, 338.9, 342.25, and 482.2), as detailed elsewhere in this report, the Residential Design Guide is embedded in HRZ the policy framework and the matters of discretion for multi-unit housing. This means that all multi-unit developments are required to illustrate that they meet the intent of the design guide. There are a range of HRZ standards that ensure either

a minimum level of on-site amenity including outdoor living space requirements, outlook space requirements, landscaping, minimum residential unit size and building separation requirements, or effects from non-compliance are considered through assessment of a resource consent application. In my view these standards strike an appropriate balance between enabling opportunities for housing and ensuring quality living environments.

130. Regarding the submissions in relation to active transport (Living Streets Aotearoa [482.49], Bruce Crothers [319.3], Joan Fitzgerald [323.1], I again refer to assessment detailed elsewhere in this report, that at an individual building scale, provisions to support active travel are incorporated in the transport chapter and ensure provisions and appropriate design of cycle and micromobility storage for residential units. The Residential Design Guide also includes guidelines relevant to bicycle storage. There is no need to duplicate these provisions in the MRZ, HRZ or LLRZ chapters.
131. In response to the submission point of Braydon White [146.13] seeking the requirement of active travel accommodation, standards in the Transport Chapter include such requirements. The Transport chapter of the PDP will be addressed in Hearing Stream 9.
132. In response to Fire and Emergency New Zealand [273.2], I refer to my assessment of submission points 273.169 and 273.170, where I disagree that it is appropriate to include 'Emergency Service Facilities' in the list of enabled activities in MRZ-P1. This is because emergency facilities are provided for as a Restricted Discretionary activity under MRZ-R9. In regard to access and water supply for new developments, this matter relates to the Three Waters chapter and will be addressed in Hearing Stream 5.
133. In response to Anna Jackson [222.3 and 222.5], I refer to my assessments elsewhere in this S42A report with respect to MRZ-S10, HRZ-S10 and LLRZ-S8. I note that I have recommended that these provisions, which relate to permeability, be moved to the Three Waters chapter. Provisions for multi-unit housing in the MRZ and HRZ make reference to 'management, storage and collection of all waste, recycling and organic waste'. I consider that these provisions suitably address waste management.
134. In regard to the submission of Mt Victoria Residents' Association [342.24] that residential unit size standards include a measure of minimum floor space per person, I refer MRZ-S12 and HRZ-S12 – being the standards for minimum residential unit size for multi-unit housing, and my assessment of these standards as detailed elsewhere in this report.
135. In response to the submission of Antony Kitchener and Simin Littschwager [199.9] that seek that Council stipulate a certain percentage of newly built dwellings to be classed as "affordable", I consider this is out of scope.
136. In response to the submission of Living Streets Aotearoa [482.52] that seeks that new and altered multi-unit developments be insulated for noise and energy efficiency, I refer to my assessment for MRZ-P6 and HRZ-P6 in relation to noise sensitive activities.

137. Regarding the submission of Lorraine and Richard Smith [230.1], Alan Fairless [242.4], and Elizabeth Nagel [368.4], the matters sought to be addressed in a new objective are instead appropriately covered in the Historic Heritage chapter objectives, particularly HH-O1 (Recognising Historic Heritage).
138. In response to the submission of Kāinga Ora [391.310] (opposed by Onslow Residents Community Association [FS80.31]) to amend standards across the plan to be proportionate to the building height changes sought in the submission, these changes are addressed under each standard separately.
139. Regarding the submission of Donna Yule [421.1] who opposes the blanket policy of medium density three-storey residential housing in all residential areas, the provision for three storey developments in the MRZ and HRZ implements the MRDS.

Summary of recommendations

140. HS2-P1-Rec7: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to general matters on design and active transport.
141. HS2-P1-Rec8: That submission points relating to 'General Matters on Design and Active Transport' are accepted/rejected as detailed in Appendix B.

6.5 General Points on Sunlight and Shading

Matters raised by submitters

142. Kate Zwartz [110.1] seeks reconsideration of loss of heritage protections and of the blanket 21m height limits in the central suburbs on the basis that preserving neighbourhood character and access to sunlight is important. Claire Nolan, James Fraser, Margaret Franken, Bidy Bunzel, Michelle Wooland, Lee Muir [FS68.39] support this submission in relation to extending character precincts in Newtown.
143. Gael Webster [114.2] seeks that more qualifying matters are provided to give greater protection of heritage/character/townscape and amenity values (particularly sunshine hours on dwellings).
144. Vivienne Morrell [155.7] considers that it is a particular issue if a new building blocks the sunlight from existing solar panels on a neighbour's property.
145. Russell Taylor [224.1] considers that the requirement to ensure all residential properties have north facing sunlight and no property can shade adjacent properties needs to be strengthened.
146. Alan Fairless [242.15] seeks that the PDP more comprehensively provides for enhanced sunlight access to outdoor and indoor living areas.

147. Steve Dunn [288.7] seeks that the PDP is amended to protect sunlight access for all outdoor living areas, not just public open space, as well as solar panels on roofs, in order to meet the objective of a healthy living environment.
148. James Coyle [307.5] opposes the current change for multi-unit developments from the four hour winter sunlight to living areas requirement to one hour of daylight to living areas.
149. Ingrid Downey [443.1] seeks that the existing provisions relating to minimum sunlight in the ODP are reinstated in the PDP, and considers that light is fundamental to our well-being and shading is far more than simply a minor issue. Reductions in sunlight can and do affect heating and light costs; dampness; the ability to dry clothes outside and grow food; and mental well-being.
150. Glen Scanlon [212.3] seeks that the PDP retains the provisions for sunlight hours from the ODP design guides.
151. Penelope Borland [317.8] seeks that the PDP include sunlight provisions in all residential zone housing areas, rather than a minimum of two hours of daylight.
152. Paul Gregory Rutherford [424.15] seeks that the PDP must more comprehensively provide for enhanced sunlight access to outdoor and indoor living areas, the addition and extension of new green space to balance increased residential densities and strengthen the urban design qualities of the city through a more sophisticated approach to design guidance, in particular the use of local design guides tailored to local areas.
153. Inner City Wellington [352.3] considers that the PDP may not be able to directly influence and improve sunlight protection.
154. Eva Brodie [217.1] seeks that the PDP is amended to put more emphasis on protecting neighbours' sun access, particularly noting developments built to the edge of zones in the HRZ in Lower Kelburn will mean losses of privacy, sun, views, and access.
155. Lorraine and Richard Smith [230.6] seek that the PDP recognises the critical importance of sunlight to the wellbeing of residents.
156. Mt Victoria Residents' Association [342.16] seeks that access to sunlight and warmth in schools, hospitals and hospice be protected from neighbouring tall developments.
157. Catharine Underwood [481.21] seeks that provisions for multi-unit developments be stricter in regard to the shade they can cast.
158. Braydon White [146.11 and 146.12] and Emma Osborne [410.8 and 410.9 (opposed by Stephen Minto FS100.17 and FS100.9)] consider that where shading is a qualifying matter, there is a new policy for providing pop-up public realm for development-shaded homes.

Assessment

159. In response to Kate Zwartz's [110.1] submission (supported by Claire Nolan, James Fraser, Margaret Franken, Bidy Bunzel, Michelle Wooland, Lee Muir [FS68.39]) regarding the loss of

heritage and reconsidering the 21m height limits in the central suburbs, heritage protection has been through a review process and the 21m height limit is considered appropriate for the HRZ in instances that meet relevant permitted activity standards. In addition, the height limits in the PDP give effect to the relevant legislation, including the NPS-UD.

160. Regarding Gael Webster's [114.2] submission, which seeks that more qualifying matters are provided, qualifying matters have been applied in the PDP in accordance with the MDRS.
161. Regarding Vivienne Morrell's [155.7] submission, the anticipated impact on solar panel efficiency from shading caused by new high-density residential buildings on existing lower-height residential dwellings is, for the most part, an unavoidable impact from the change that will occur from enabling a greater level of residential intensification. In this case, the wider benefits of enabling greater housing supply through HRZ (and MRZ) are required to be prioritised over a reduction in permitted height for multi-unit residential buildings to protect the efficiency of solar panels on adjacent sites.
162. In response to the submissions of Russell Taylor [224.1], Alan Fairless [242.15], Steve Dunn [288.7], James Coyle [307.5], Ingrid Downey [443.1], Glen Scanlon [212.3], Penelope Borland [317.8], Paul Gregory Rutherford [424.15], Inner City Wellington [352.3], Eva Brodie [217.1], Lorraine and Richard Smith [230.6], Mt Victoria Residents' Association [342.16] and Catharine Underwood [481.21], which generally seek strengthening of sunlight requirements, the current standards relating to development are considered sufficient to address sunlight concerns. In addition, I note the Residential Design Guide will ensure the development is of a quality design.
163. Regarding the submission points of Braydon White [146.11 and 146.12] and Emma Osborne [410.8 and 410.9 (opposed by Stephen Minto [FS100.17 and FS100.9]), which is inferred to seek to reduce the effect of shading and provide a new policy for providing pop-up public realm for houses that are shaded by new development, the current standards relating to development are considered sufficient to address shading concerns. It is considered that public spaces are provided for throughout the city.

Summary of recommendations

164. HS2-P1-Rec9: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to general matters on sunlight and shading.
165. HS2-P1-Rec10: That submission points relating to 'General Matters on Sunlight and Shading' are accepted/rejected as detailed in Appendix B.

6.6 General Points on Boundary Setbacks

Matters raised by submitters

166. Victoria Stace [235.2] seeks that yard setbacks of at least 1.5m front yard and 1m side yard are required in all residential zones.

- 167. Judith Graykowski [80.2] and Vivienne Morrell [155.8] consider dwellings built to site boundaries are poor quality and should require transition from street to doorway.
- 168. Ben Barrett [479.17] seeks that the District Plan promotes better use of land and urban space by allowing boundary sharing (of walls or partitions on the boundary) if both parties are in agreement.
- 169. Rimu Architects Ltd [318.24] seeks clarity on how low decks and eaves will be treated in the residential zone in relation to setbacks.

Assessment

- 170. Regarding the submission point of Victoria Stace [235.2], MRZ-S4, HRZ-S4 and LLRZ-S6 require boundary setbacks of least 1.5m front yard and 1m side yard. These provisions are discussed further in the HRZ, MRZ and LLRZ sections of this S42A report.
- 171. Regarding the submission points of Judith Grayowski [80.2] and Vivienne Morrell [155.8], where a development does not meet the permitted front yard setback, resource consent will be required, which will assess the streetscape and visual amenity effects.
- 172. Regarding the submission point of Ben Barrett [479.17], I note that there are already provisions in the PDP which allow this, particularly in relation to multi-units sharing a common wall.
- 173. Regarding the submission point from Rimu Architects Ltd [318.24], I refer to the assessment of 318.27 and 266.148 in HRZ-S4, and 318.25 and 266.139 in MRZ-S4.

Summary of recommendations

- 174. HS2-P1-Rec11: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to recommended in response to 235.2, 80.2, 155.8 or 479.17.
- 175. HS2-P1-Rec12: That submission points relating to ‘General Matters on Boundary Setbacks’ are accepted/rejected as detailed in Appendix B.
- 176. HS2-P1-Rec13: Amendments in response to Rimu Architects Ltd [318.24] are addressed in the recommendations on HRZ-S4 and MRZ-S4.

6.7 General Points on Height and Height in Relation to Boundary

Matters raised by submitters

- 177. Waka Kotahi [370.260] support greater heights for multi-unit developments that are subject to resource consent.
- 178. Grant Buchan [143.5] seeks that height limits inconsistent with the NPS-UD are removed, even if these were present in the Spatial Plan.

179. Ben Barrett [479.11] seeks that the PDP will ensure building heights are tiered and not haphazard.
180. Michael O'Rourke [194.3 and 194.4] seeks that height zoning should be applied more microscopically and be graduated based on neighbourhood, topography, and position on block to minimise the impact on neighbouring properties.
181. James Coyle [307.9] considers there needs to be a maximum height for single dwellings that is much lower than for multi-unit developments. He notes that the demographic of Newtown is changing, and an outcome may be large houses that have car parking underneath and that build high to access views.
182. Henry Bartholomew Nankivell Zwart [378.10] seek that height limits are increased in the 15 minute walking catchments to rail stations.
183. Anita Gude and Simon Terry [461.17] consider that a height limit of 11m on properties bordering the town belt will lead to a loss of character over time and will degrade the natural backdrop that the town belt provides for the City. They seek to amend the rules (and associated objectives and policies) so that a height limit of 8m is applied to all properties bordering the town belt.
184. Johnsonville Community Association [429.30] considers that 3+ storey developments will render neighbouring homes less warm and dry.
185. Ben Barrett [479.21] seeks that appropriate building planning needs to be had along Constable Street, varying in height, with building heights reducing as the elevation of the road rises.
186. Mt Victoria Residents' Association [342.12 (supported by Roseneath Residents' Association FS49.9 and Matthew Wells, Adelina Reis and Sarah Rennie FS50.8)] considers that the viewshaft from Matairangi Mt Victoria over the city towards Te Ahumairangi, Brooklyn and Mt Albert will be greatly diminished if the building heights are realised at the levels imagined in the PDP.
187. Ben Barrett [479.14] seeks that the PDP includes protections for existing property owners to prevent overshadowing from new multi-story buildings, or current market rate compensation options for existing property owners that are overshadowing from new multi-story buildings.
188. Newtown Residents' Association [440.8] seeks that negative environmental effects of high-rise development be considered as a specific overlay.
189. Interprofessional Trust [96.4] seeks that the recession plane standards are removed from the PDP.

Assessment

190. No specific decision has been requested in relation to submission point from Waka Kotahi [370.260]. This point has been noted.
191. In response to submission points of Grant Buchan [143.5], Ben Barrett [479.11], Michael O'Rourke [194.3 and 194.4], James Coyle [307.9], Henry Bartholomew Nankivell Zwart [378.10], Anita Gude and Simon Terry [461.17], Johnsonville Community Association [429.30], Ben Barrett

[479.21], Mt Victoria Residents' Association [342.12 (supported by Roseneath Residents' Association FS49.9 and Matthew Wells, Adelina Reis and Sarah Rennie FS50.8)], Ben Barrett [479.14], Newtown Residents' Association [440.8], and Interprofessional Trust [96.4], noting that the current height limits and height in relation to boundary standards in the PDP are adequate to provide sufficient housing to meet demand and balance the impacts on residential amenity, the height limits are informed by the relevant legislation, including Clause 5 of Schedule 3A of the RMA and the NPS-UD. Further, I am comfortable that the Residential Design Guide will ensure outcomes are of an appropriate design.

192. I note that the walkable catchments have been addressed in the S42A report and subsequent hearing for Hearing Stream 1. If the Independent Hearings Panel determines that the walkable catchments should be extended to 15 minutes, increased building height limits will be afforded to a wider area. This aligns with the relief sought by Henry Bartholomew Nankivell Zwart [378.10].

Summary of recommendations

193. HS2-P1-Rec14: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to recommended in response to general matters on height in relation to boundary.
194. HS2-P1-Rec15: That submission points relating to 'General Matters on Height in Relation to Boundary' are accepted/rejected as detailed in Appendix B.

6.8 General Points on Outdoor Space

Matters raised by submitters

195. Jill Ford [163.8] seeks that all new multi-unit developments include public outdoor green space suitable for children.
196. Living Streets Aotearoa [482.48] seeks that new and altered multi-unit developments have outside spaces including for clothes drying. Living Streets Aotearoa [482.50] also seek that new and altered multi-unit developments provide green space both private and communal.
197. Lorraine and Richard Smith [230.13] consider that homes should be warm, dry places of stability where natural sunlight, mood enhancing benefits and areas of open space are recognised as essential to human wellbeing.
198. Emma Osborne [410.7] and Braydon White [146.10] seeks that the MRZ is amended to include the Coalition for More Homes' 'alternative medium density residential standards' recommendations for outdoor living space and green space.
199. Interprofessional Trust [96.5] seeks limits for indoor-outdoor ambience be imposed as set out in the submission.

200. Anna Jackson [222.4] seeks addition of a requirement for shared mini-parks and other forms of green spaces.

Assessment

201. In response to the submission points of Emma Osborne [410.7] and Braydon White [146.10] seeking that the MRZ is amended to include the Coalition for More Homes' alternative medium density residential standards recommendations for outdoor living space and green space, the proposed standards are considered appropriate and in line with the MDRS.
202. Regarding the submissions from Lorraine and Richard Smith [230.13], Jill Ford [163.8], Living Streets Aotearoa [482.48 and 482.50] and Interprofessional Trust [96.5], standards HRZ-S6, HRZ-S7, MRZ-S6, MRZ-S7 suitably provide for private outdoor living space and outlook space. Standards HRZ-S13, HRZ-S14, MRZ-S13, MRZ-S14 suitably provide for communal outdoor living space.

Summary of recommendations

203. HS2-P1-Rec16: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to recommended in response to general matters on outdoor space.
204. HS2-P1-Rec17: That submission points relating to 'General Matters on Outdoor Space' are accepted/rejected as detailed in Appendix B.

6.9 General Points on Accessibility

Matters raised by submitters

205. Mt Victoria Residents' Association [342.24] seeks that housing needs to provide a high standard of accessibility, because 25% of New Zealanders will be over 65 by 2030 and 25% of New Zealanders have a disability.
206. Living Streets Aotearoa [482.47] seeks that new and altered multi-unit developments are accessible.
207. Braydon White [146.14] seeks that universal accessibility is a non-negotiable for all developments.
208. Amos Mann [172.6] seeks that easier consenting and incentives for accessible and eco-friendly developments are provided for.
209. Anna Jackson [222.6] seeks addition of a requirement for consideration of disability access to be factored into planning.

Assessment

210. In response to submissions from Mt Victoria Residents' Association [342.24], Living Streets Aotearoa [482.47], Braydon White [146.14], Amos Mann [172.6], and Anna Jackson [222.6], high

quality buildings is a key Outcome of the Residential Design Guide, which include inclusivity and universal design. In the design guide this flows through to entrance widths, step-free entry, and best practice internal design for accessibility and functionality.

Summary of recommendations

- 211. HS2-P1-Rec18: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to recommended in response to general matters on accessibility.
- 212. HS2-P1-Rec19: That submission points relating to 'General Matters on Accessibility' are accepted/rejected as detailed in Appendix B.

6.10 General Points on Notification

Matters raised by submitters

- 213. Lorraine and Richard Smith [230.15] and Paul Gregory Rutherford [424.5] seek that the Proposed District Plan be amended to make greater provision for limited notification in relation to light, shading, privacy and wind effects so as to enable and support fair and reasonable compromises between neighbours. Lower Kelburn Neighbourhood Group [FS123.33] seek submission point 424.5 is allowed and seek that the Council instate notification procedures as requested.
- 214. Carolyn Stephens [344.3] and Elizabeth Nagel [368.8] seek that limited notification provisions be prioritised over non-notification, especially in relation to light, shading, privacy and wind effects. Lower Kelburn Neighbourhood Group [FS123.25 and FS123.26] seek that submission points 344.3 and 368.8 are allowed and seek that the Council instate notification procedures as requested.
- 215. Kāinga Ora [391.7] seeks that the preclusion of public notification is applied beyond a development site, for breaches such as side yards, height, daylight and coverage. Stride Investment Management Limited [FS107.34] and Investore Property Limited [FS108.34] support precluding notification where it is unlikely to be helpful to the decision-maker (for example, where the consent breach is of a technical nature and any effects are likely to be limited to the subject site or identified surrounding sites), and seek that 391.7 be allowed.
- 216. Johnsonville Community Association [429.29] seeks that the criteria required for permitting non-compliant housing developments on a non-notified basis is more clearly outlined in the PDP.
- 217. Richard Murcott [322.3] seeks that new developments in the Thorndon area require resource consents, with notification clauses that provide for the community and neighbours to have a say on new developments.
- 218. Alan Fairless [242.13] seeks that the PDP is amended to encompass more new developments as controlled activities in respect of urban design to ensure quality in design at a local level can be considered for the majority of developments.

Assessment

219. Regarding the submission points of Lorraine and Richard Smith [230.15], Paul Gregory Rutherford [424.5], Carolyn Stephens [344.3], Elizabeth Nagel [368.8], Lower Kelburn Neighbourhood Group [FS123.33, FS123.25 and FS123.26], Kāinga Ora [391.7], Stride Investment Management Limited [FS107.34], Investore Property Limited [FS108.34] and Richard Murcott [322.3], refer to the assessment regarding notification for MRZ-R2.
220. Regarding the submission point from Johnsonville Community Association [429.29], it is considered that circumstances for preclusion from notification are outlined in the PDP.
221. In response to the submission from Alan Fairness [242.13] seeking that more new developments are controlled activities to ensure quality design, it is a requirement of the MDRS that certain developments be permitted.

Summary of recommendations

222. HS2-P1-Rec20: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to recommended in response to general matters on notification.
223. HS2-P1-Rec21: That submission points relating to 'General Matters on Notification' are accepted/rejected as detailed in Appendix B.

6.11 General Points on the Planning for Residential Amenity Report

Matters raised by submitters

224. Six submissions support the Planning for Residential Amenity, Boffa Miskell Report. These were James and Karen Fairhall [160.1], Karen and Jeremy Young [162.1], Dougal and Libby List [207.1], Craig Forrester [210.1], Moir Street Collective [312.1], and Newtown Residents' Association [440.2]. Kim McGuinness, Andrew Cameron, Simon Bachler, Deb Hendry, Penny Evans, Stephen Evens, David Wilcox, Mary Vaughan Roberts, Siva Naguleswaran, Mohammed Talim, Ben Sutherland, Atul Patel, Lewis Roney Yip, Sarah Collier Jaggard [204.2] support the submission put forward by Newtown Residents' Association.
225. Many of these submitters noted support for boundary setbacks – 'in the order of 1-3m are common'.

Assessment

226. Regarding the above submission points, support for the Planning for Residential Amenity is noted, and in particular the submitters support for the setback recommendations. No decisions were requested by these submitters, other than 440.2 whose decision sought is support of the Planning for Residential Amenity, Boffa Miskell Report.
227. This matter of setbacks is addressed in detail in Part 4 of this report, which addresses the Character Provisions and the Boffa Miskell Report.

Summary of recommendations

228. HS2-P1-Rec22: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to recommended in response to general matters on the Planning for Residential Amenity Report.
229. HS2-P1-Rec23: That submission points relating to 'General Matters on the Planning for Residential Amenity Report' are accepted/rejected as detailed in Appendix B.

6.12 General Points on Reverse Sensitivity

Matters raised by submitters

230. The Fuel Companies [372.106 and 372.107] consider that proposed changes to the residential zones have the potential to generate reverse sensitivity effects and amenity effects, and seek to ensure that larger-scale and higher-density residential developments are designed to managed reverse sensitivity where there is an interface with a commercial or Mixed-use Zone, or with lawfully established non-residential activities. Kāinga Ora [FS89.46], Retirement Villages Association [FS126.14], and Ryman Healthcare [FS128.14] seek that 372.106 be disallowed.

Assessment

231. In response to the submission points from Fuel Companies [372.106], Kāinga Ora [FS89.46], Retirement Villages Association [FS126.14], and Ryman Healthcare [FS128.14], refer to the assessment for MRZ-P6 in relation to reverse sensitivity.

Summary of recommendations

232. HS2-P1-Rec24: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to recommended in response to general matters on reverse sensitivity.
233. HS2-P1-Rec25: That submission points relating to 'General Matters on Reverse Sensitivity' are accepted/rejected as detailed in Appendix B.

6.13 General Points on Educational Precincts

Matters raised by submitters

234. Scots College Incorporated [117.1, 117.2, 117.3] seeks that the "Educational Precincts" in the Operative District Plan should be retained in the PDP for all existing Educational Precincts, and that these precincts be identified in the planning maps.

Assessment

235. In response to Scots College Incorporated submission points', refer to the assessment for submission point 117.8 for MRZ-P1.

Summary of recommendations

- 236. HS2-P1-Rec26: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to recommended in response to general matters on educational precincts.
- 237. HS2-P1-Rec27: That submission points relating to 'General Matters on Educational Precincts' are accepted/rejected as detailed in Appendix B.

6.14 General Points on Mt Cook

Matters raised by submitters

- 238. Peter Hill [41.1, 41.2 and 41.5] seeks that the character areas in Mount Cook be redrawn to support a sensible zoning pattern.
- 239. Jonathan Markwick [490.14] supports the height controls in the Mt Cook area as notified.
- 240. Pauletta Wilson [257.1] supports more housing in Mount Cook but wants to see it done without loss of character and diversity.

Assessment

- 241. In response to the submission of Peter Hill [41.1, 41.2 and 41.5] for areas to be redrawn to support a sensible zoning pattern, the Character Precincts have been identified and mapped based on the consistency and coherence of character of the houses in these areas. This may not necessarily mean they neatly fit within blocks. That said, the extent of the Character Precincts have been further discussed in Part 4 of this S42A report, where Mr Lewandowski recommended that the boundaries of these areas change, as detailed in his report.
- 242. No specific decision has been requested in relation to submission point from Pauletta Wilson [257.1]. This point has been noted.

Summary of recommendations

- 243. HS2-P1-Rec28: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to recommended in response to general matters on Mt Cook.
- 244. HS2-P1-Rec29: That submission points relating to 'General Matters on Mt Cook' are accepted/rejected as detailed in Appendix B.

6.15 General Points on Newtown

Matters raised by submitters

- 245. Claire Nolan, James Fraser, Bidy Bunzl, Margaret Franken, Michelle Wolland, and Lee Muir [275.2] seek that the level of high-density development in Newtown be reduced because of the constraint around the Three Waters infrastructure.

246. Ben Barrett [479.10] opposes the intensification in Newtown on the basis that Newtown is unfairly targeted for the highest of intensification and all of Wellington should be subject share the same intensity goals.
247. Catharine Underwood [481.12] seeks that the 'We Are Newtown housing/dwelling plan/proposal by the residents for the residents' be recognised and considered as the PDP provisions for Newtown. WIAL [FS36.242] oppose this submission for the reason that the matter goes beyond the scope of the District Plan controls.
248. Steve Dunn [288.6] seeks that building heights in central Newtown are amended to 3 to 4 storeys along its transport spine.
249. James Coyle [307.6] seeks that Newtown have special zones dedicated to intensive development to create terraced housing blocks and plaza, such as the area opposite the entry to the zoo with borders of Owen, Daniell and Manchester.
250. Ros Bignell [186.6] supports and welcomes new residential building that is well designed and complementary to the current streetscape of Newtown and seeks that new residential building that is well designed and complementary to the current streetscape of Newtown is welcomed. Claire Nolan, James Fraser, Margaret Franken, Bidy Bunzel, Michelle Wooland, Lee Muir [FS68.24] support submission point 186.6 and seek that character protections should extend to Lawrence Street, Newtown.
251. Newtown Residents' Association [440.15] considers that allowing extensive redevelopment which removes the existing trees and other plants in Newtown's backyards does permanent damage to the natural biodiversity of the area.

Assessment

252. Regarding submissions in relation to the level or location of intensification, this has been discussed in the S42A for Hearing Stream 1 (Part 1, plan wide matters and strategic direction). Walking catchment areas and associated rules enabling high density have been set through the Spatial Plan and the NPS-UD.
253. Regarding the submission from Catharine Underwood [481.12] and opposed by WIAL [FS36.242], it is not considered appropriate to incorporate the 'We Are Newtown housing/dwelling plan/proposal by the residents for the residents' document into the PDP.
254. In response to the submission from Ros Bignell [186.6 (supported by FS68.24)], matters raised relating to well-designed buildings are considered to be provided for through the PDP.
255. No specific decision is requested from the submission point from Newtown Residents' Association [440.15]. The point has been noted.

Summary of recommendations

256. HS2-P1-Rec30: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to recommended in response to general matters on Newtown.
257. HS2-P1-Rec31: That submission points relating to 'General Matters on Newtown' are accepted/rejected as detailed in Appendix B.

6.16 General Points on Aro Valley

Matters raised by submitters

258. John Bryce [354.1] seeks that the PDP protects future inhabitants of dwellings by ensuring good quality living spaces, and developing special rules for areas like Aro Valley where one size building rules will result in poor quality and unhealthy dwellings. For example, six story buildings are totally inappropriate in many parts of Aro Valley where they would block the small amount of winter sunshine from nearby property.
259. Roland Sapsford [305.6] seeks that the PDP is amended to address sunlight and shading with particular reference to Aro Valley. Concerned that removing the ability to address sun and shading issues on a site-specific basis will pose a risk to existing housing stock, as new houses positioned to maximise solar access will shade established houses. Lower Kelburn Neighbourhood Group [FS123.27] seeks that this submission point is allowed and that the Council reinstate notification for high rise building effects on surrounding housing with regard to sunlight, shade, wind and more.

Assessment

260. In response to the submissions of John Bryce [354.1] and Roland Sapsford [305.6] which seek amended standards for Aro Valley, many provisions reflect legislation which directs certain standards. I also note the Residential Design Guide will ensure the development is of a quality design.

Summary of recommendations

261. HS2-P1-Rec32: Unless specified elsewhere in Parts 2 to 5 of this S42A report, no amendments are recommended in response to recommended in response to general matters on Aro Valley.
262. HS2-P1-Rec33: That submission points relating to 'General Matters on Aro Valley' are accepted/rejected as detailed in Appendix B.

7.0 Summary of Further Submissions

263. The following parties made further submissions that supported or opposed submissions in relation to the residential provisions in their entirety:
 - Ruapapa Limited [FS18.1 & FS18.2] supports in whole the original submissions of Oriental Bay Residents Association Inc [128] and Pukepuke Pari Residents Incorporated [237].

- Gael Webster [F20.1] opposes in whole the original submission Kāinga Ora Homes and Communities [391].
- Jaqui Tutt [FS35.1, FS35.2, FS35.4, FS35.5, and FS35.6] supports in whole the original submissions of Alan Fairless [242], Ingrid Downey [443], Keith Clement [231], Roland Sapsford [305], and LIVE WELLington [154].
- Gareth and Joanne Morgan [FS38.1 & FS38.2] supports in whole the original submissions of Oriental Bay Residents Association Inc [128] and Pukepuke Pari Residents Incorporated [237].
- Mt Victoria Historical Society Inc [FS39.25, FS39.26, FS39.27, FS39.28, and FS39.29] supports in whole the original submissions of Glenside Progressive Association Inc [374], John Tiley [142], Lucy Harper and Roger Pemberton [401], Mt Victoria Residents Association [342], VUWSA [123].
- Karori Resident’s Association [FS42.1] supports in whole the original submission of Parkvale Road Limited [298].
- Andrea Skews [FS43.1] supports in whole the original submission of Parkvale Road Limited [298].
- Generation Zero [FS54.51] supports in whole the original submission of Disabled Persons Assembly New Zealand Incorporated [343].
- Phil Kelliher [FS57.1 & FS57.2] supports in whole the original submissions of Mount Victoria Historical Society [214] and LIVE WELLington [154].
- Claire Nolan, James Fraser, Margaret Franken, Biddy Bunzel, Michelle Wooland, and Lee Muir [FS68.2] opposes in whole the original submission of Kāinga Ora Homes and Communities [391] and [FS68.54] supports in whole the original submission of LIVE WELLington [154].
- Richard Murcott [FS71.5] supports in whole the original submission of Thorndon Residents' Association [333].
- Onslow Residents Community Association [FS80.53, FS80.54, FS80.55, and FS80.56] opposes in whole the original submission of Kāinga Ora Homes and Communities [391].
- Wellington’s Character Charitable Trust [FS82.1 & FS82.2] opposes in whole the original submissions of Kāinga Ora Homes and Communities [391] and Ministry of Housing and Urban Development [121].
- Metlifecare Limited [FS87.1] opposes in whole the original submission of Parents for Climate Aotearoa [472].
- Stephen Minto [FS100.22 - FS100.32] opposes in whole the original submissions of Parents for Climate Aotearoa [472], Cameron Vannisselroy [157], David Cadman [398], Ella Patterson [138], Emma Osborne [410], Gabriela Roque-Worcel [234], Henry Bartholomew Nankivell Zwart [378], Ingo Schommer [133], Jonathan Markwick [490], Luke Stewart [422], and Matthew Tamati Reweti [394].

- Friends of the Wellington Town Belt [FS109.1, FS109.2 and FS109.5] supports in whole the original submissions of Glenside Progressive Association Inc [374], Lucy Harper and Roger Pemberton [401], and VUWSA [123].
- Christopher Kennedy [FS120.1] supports in whole the original submission of Kilmarston Developments Limited and Kilmarston Properties Limited [290].
- Susan Pierce [FS121.1] supports in whole the original submission of Kilmarston Developments Limited and Kilmarston Properties Limited [290].
- The Retirement Villages Association of New Zealand Incorporated [FS126.184] supports in part the submission of McIndoe Urban Limited [135] subject to the relief sought by the Retirement Villages Association of New Zealand Incorporated and [FS126.214] opposes in whole the original submission of Susan Rotto [63].
- Ryman Healthcare Limited [FS128.214] opposes in whole the original submission of Susan Rotto [63].
- Paul Blaschke [FS129.15] supports in whole the original submission of Tapu-te-Ranga Trust [297].
- Aro Valley Community Council [FS134.1, FS134.2, FS134.4 and FS134.5] supports in whole the original submissions of Alan Fairless [242], Ingrid Downey [443], Keith Clement [231], and Roland Sapsford [305].
- Alan Fairless [FS135.2 - FS135.6] supports in whole the original submissions of Ingrid Downey [443], Weta FX [364], Keith Clement [231], Roland Sapsford [305] and LIVE WELLington [154].
- The Retirement Villages Association of New Zealand Incorporated [FS126.184] and Ryman Healthcare Limited [FS128.184] support the original submission made by McIndoe Urban Limited [135].
- Alan Fairless [FS135.1] support the original submission made by Jaqui Tutt [209].

245. The abovementioned further submitters seek the relief sought in the original submissions that they refer to. These matters are addressed elsewhere in this S42A report, and no further analysis of these submission points is required.

8.0 Minor and Inconsequential Amendments

246. Pursuant to Schedule 1, clause 16 (2) of the RMA, a local authority may make an amendment, without using the process in this schedule, to its proposed plan to alter any information, where such an alteration is of minor effect, or may correct any minor errors.

247. Any minor and inconsequential amendments relevant to the residential zones and/or Design Guides provisions will be listed in the appropriate sections of this S42A report.

248. The recommended amendments are set out in the tracked changes versions of the applicable chapters and design guides, which are provided at Appendix A.

9.0 Conclusion

249. As will be discussed further within Parts 2 to 6 of this S42A report, a wide range of submissions and further submissions have been received with respect to the residential provisions within the PDP. Submissions will be further analysed in the remainder of this report, with my recommendations set out at Appendices A and B.

250. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that PDP should be amended as set out in Appendix A of this report.

251. For the reasons set out in the Section 32AA evaluation included throughout this report, I consider that the proposed objectives and provisions, with the recommended amendments, will be the most appropriate means to:

- a. Achieve the purpose of the Resource Management Act 1991 (RMA) where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives, and
- b. Achieve the relevant objectives of the PDP, in respect to the proposed provisions.

10.0 Recommendations

252. I recommend that:

- a. The Independent Hearing Panel accept, accept in part, or reject submissions (and associated further submissions) as outlined in Appendix B of this report; and
- b. The PDP is amended in accordance with the changes recommended in Appendix A of this report.

Appendix 1 – Submissions on Residential Provisions