

Plan Change 13

Te Rapa Racecourse Private Plan Change

Summary of Submissions

13 April 2023

Submitters

Submission Number	Submitter
1	McMac Properties Limited
2	Fire and Emergency New Zealand
3	Fonterra Limited
4	Metlifecare Ltd.
5	Murray J. V. Bindon, Lanza International Ltd
6	Chartwell Investments Ltd
7	Takanini Rentors
8	Ecostream Irrigation
9	Shane Burnett Housley
10	Denise Allen - Ecostream Irrigation
11	Derek Fleet, Purewater Products
12	Scott Brocket, Custom Utes
13	Angela Fisher, NTB Racing
14	Jason and Melanie Trethowen, Green Ladder Construction Ltd. Trading as Ideal Buildings
15	Mordie Myburgh, Ehome Building Centre
16	Brent Shadbolt, Miller Electrical Ltd
17	Greg Roberts, Archery Direct
18	Alan Day, A.L. Day trading as Keyport
19	Neil Fernworth, Fernworth Investments Ltd
20	Graham and Janice Lewis
21	Douglas Bruce John Hopkins
22	Gordon Finlay, Katja Hart
23	Gill Adshead, Kereru Partnership
24	Kāinga Ora
25	Stephen Lyons
26	Phillip Robinson

Summary of Submissions

Sub N°	Submitter name(s)	Sub Point	Subject	Oppose/Support	Summary of Submission	Relief/Decision Sought
1	McMac Properties Limited	1.1	Consultation	Oppose	Submitter would like more consultation and received the letter in their PO Box after the submission period started.	More consultation
		1.2	Site layout	Oppose	The 30 metre separation distance is not wide enough and should be wider to mitigate the effects of industrial activities, particularly noise, odour, lighting, vibration and movement. A road behind the property at 89 Garnett Avenue will create a security issue.	New rear security fence to be provided.
		1.3	Reverse sensitivity	Oppose	Concerns about future complaints from the new residential area. Concerned that the plan change will limit how the submitters site can be developed in future which is an interference on existing property rights.	Covenant on properties to prevent complaints about the legal industrial activities or further site development. Alternatively an industrial zoning along the existing industrial properties adjoining the proposed development.
		1.4	Stormwater	Oppose	Concerns about additional load on the stormwater system and need for upgrades. Concerned that the overland flow path and low flood hazard area will vest in Council. Concerns about building near a flood hazard area.	Extensive upgrade of stormwater system. No build within a reasonable distance of the overland flow path. No build within the low flood hazard area.
		1.5	Transportation	Oppose	Intersection of Garnett venue and Te Rapa Road is already not fit for purpose and will not cope. Where will the cars park who presently use Ken Brown Drive.	Investigation of major upgrades of road intersections at Garnett Avenue/Te Rapa Road and Sir Tristram Avenue/Te Rapa Road in conjunction with all of Te Rapa Straight. Houses and roading systems to provide for adequate parking.
2	Fire and Emergency New Zealand	2.1	Water supply - modelling	Not stated	Modelling of the existing water supply network was undertaken in 2017 which showed there was sufficient capacity within the existing network to provide sufficient level of service including residential firefighting supply.	Updated modelling of the water supply network be undertaken to confirm whether the 2017 findings are still accurate.
		2.2	Water supply – firefighting requirements for new development	Not stated	The Regional Infrastructure Technical Specifications (RITS) requires the water supply network to comply with SNZ PAS 4509:2008 however this requirement is not statutory and therefore not mandatory or enforceable. No explicit requirement within the District Plan (Policy 25.13.2.3g or Rule 25.13.4.4) to comply with SNZ PAS 4509:2008. There is a risk that the resource consent process will not adequately address firefighting water supply servicing. All subsequent subdivision and development in the Te Rapa Racecourse Medium Density Residential Precinct should be subject to a development standard within the district plan requiring all developments to demonstrate that they can be adequately serviced for firefighting water supply in accordance with the SNZ PAS 4509:2008 at the time of resource consent and conditioned accordingly.	<ol style="list-style-type: none"> Council do not enable development within the Te Rapa Racecourse Medium Density Residential Precinct unless it is matched with the delivery of key water strategic infrastructure (network extensions or upgrades), or development is not enabled where there is potential or known infrastructure capacity constraints in relation to the water supply network (unless the development itself includes necessary upgrades). Seek a specific rule in the district plan via Proposed (Private) Plan Change 13 requiring all development and subdivision in the Te Rapa Racecourse Medium Density Residential Precinct to demonstrate compliance in accordance with SNZ PAS 4509:2008.
		2.3	Transportation	Support in part	<p>Vehicular roading and access widths, surface and gradients should support the operational requirements of Fire and Emergency appliances.</p> <p>Support the no parking restriction being introduced along the northbound lane of Ken Browne Drive which would result in the full carriageway width being trafficable at all times for emergency service vehicles. The same approach should be taken for Sir Tristram Avenue.</p> <p>The trafficable carriageway of 6m should not be reduced or used to accommodate parking. The typical cross section provided in Figure 20 and 21 of the Integrated Transport Assessment (ITA) is supported on that basis.</p> <p>Fire and Emergency support the private rear-lanes being constructed to a minimum carriageway width of 5.5m as shown in Figure 22 of the ITA on the basis that no off street parking will be provided along the rear lanes. Care should be given to roadside landscaping. Further support these rear-lanes being designed as through roads creating crossroad intersections with the local roads which will avoid the need for turning circles and reverse maneuvering.</p> <p>Support new Rule 23.7.9 specific to the Te Rapa Racecourse Medium-Density Residential Precinct that requires all subdivision to comply with the minimum widths as specified in the ITA, and on the basis that the development will be subject to the minimum carriageway widths as specified in Appendix 15 Table 15- 6aii of the district plan.</p> <p>Council should consider the effects of the potential for increased demand on off-street parking given there is no requirement by the developer to provide onsite parking.</p>	<ol style="list-style-type: none"> Fire and Emergency suggest that Council consider introducing a 4m vertical clearance requirement for all transport corridors within the Te Rapa Racecourse Medium Density Residential Precinct. No parking on Sir Tristram Avenue.
3	Fonterra Limited	3.1	Consultation	Oppose	No consultation was undertaken with Fonterra during preparation of PC13	No specific relief sought.
		3.2	Reverse sensitivity	Oppose	No information has been provided within the PC13 documentation regarding the potential impacts of PC13 on the activities within the Crawford Street Freight Village including Fonterra's activities. Potential reverse sensitivity issues due to the amenity expectations of residents living in the PC13 area, against the 24 / 7 operations of the Crawford Street Distribution Centre, Canpac and the North Island Main Trunk railway line.	<ol style="list-style-type: none"> That WRCI provides further information (including mitigation measures, if necessary) to demonstrate that the residential land uses that will be enabled by PC13 will not adversely affect Fonterra's Crawford Street Distribution Centre and Canpac operations within the Crawford Street Freight Village (including the operation of the North Island Main Trunk rail line). Amend Policy 4.2.16d to require avoidance of reverse sensitivity effects. Amend the explanation associated with the objectives and policies of the Te Rapa Racecourse Medium Density Residential Precinct to include reference to the Crawford Street Freight Village. Amend the matters of discretion and assessment criteria to include reverse sensitivity effects on industrial activities. All other necessary amendments.

						6. No additional residential activities beyond those proposed as part of PC13.
4	Metlifecare Ltd.	4.1	General	Not stated	Ensure PPC13 is consistent with the objectives of the higher-level strategic planning documents and the purpose of the Resource Management Act 1991 ('RMA'). Ensure that the PPC13 area becomes a high-quality urban environment that is cohesive and sympathetic to the adjoining retirement village.	<ol style="list-style-type: none"> 1. PPC13 is appropriately amended to incorporate a residential zone that provide for a range of housing, inclusive of rest home and retirement village development. 2. Protection, maintenance and enhancement of the existing and proposed natural environments. 3. PPC13 is consistent with other relevant plan changes, such as PC12 and the MDRS standards in the MDRZ. 4. PPC13 is consistent with national planning documents, specifically the National Policy Statement for Urban Development, National Policy Statement for Freshwater Management and National Policy Statement for Indigenous Biodiversity.
		4.2	Objective 4.2.15 and Policies 4.2.15a-d.	Support with amendment	Supports this objective and subsequent policies in general, except for reference to 3-5 storey buildings. It is not suitable to reference specific bulk and mass scales in the objective. These should be addressed and covered in the relevant rules and standards.	<p>"The Te Rapa Racecourse Medium-Density Residential Precinct provides for a variety of housing types and sizes that respond to;</p> <ol style="list-style-type: none"> a. <u>Changing and diverse</u> housing needs and demand; and b. The neighbourhood's planned urban built character, including 3 to 5 storey building."
		4.3	Objective 4.2.16 and Policies 4.2.16a-e.	Support with amendment	Metlifecare supports proposed high amenity, connected developments in the Precinct. However, an amendment is sought to ensure any future development integrates with not only the Racecourse but also the other existing uses, including the Metlifecare site and other adjoining aged care facilities such as Foxbridge retirement village to the southwest.	<p>4.2.16d "Development is designed to minimize reverse sensitivity effects on the adjacent industrial area, and the racecourse, <u>rest home and retirement village.</u>"</p> <p>4.2.16e "Development integrates with and connects to the racecourse and existing <u>rest home and retirement village</u>, and residential development on the southern boundary."</p>
		4.4	Explanation of Objectives 4.2.15 and 4.2.16	Support with amendment	Metlifecare seeks that its facilities be specifically mentioned to ensure the activity can be appropriately integrated with the proposed precinct and also to ensure that any potential reverse sensitivity effects are appropriately managed.	<p>"...The purpose of the Precinct is to create a high-quality medium density residential development. It will support a walkable community with multi-modal transport options. It integrates with the <u>existing rest home, retirement village and</u> residential development adjacent to the racecourse on Minogue Drive and Ken Browne Drive.</p> <p>The Te Rapa Racecourse Medium Density Residential Precinct Plan spatially manages the layout of the area, applying place-based provisions, including setbacks to manage reverse sensitivity effects of adjacent industrial land, <u>rest home and retirement village</u>, a roading layout to discourage through traffic, and a development layout to maintain a relationship with the racecourse as an amenity and recreational feature..."</p>
		4.5	4.5.4 Activity status table	Support	Metlifecare supports the changes proposed to the MDRZ activity status table as a whole but specifically supports the Restricted Discretionary activity status (from Discretionary) for Rest Home and Retirement Village activities. This aligns with the intent of the NPS-UD.	Retain as notified.
		4.6	4.5.4 Activity status table	Oppose	The table should include an activity status for activities that do not comply with the relevant standard.	Provide as xx: <u>any activity listed in kk – uu which does not comply with a relevant standard is a Restricted Discretionary activity or any activity that does not comply with the Precinct Plan.</u>
		4.7	Precinct Plan Figure 4.5-1	Support	Generally, Metlifecare supports this high-level plan.	Retain as notified (subject to the amendments sought elsewhere in the submission).
		4.8	4.6.3 Height in relation to boundary	Oppose	Oppose the height in relation to boundary 4m plus 60-degree recession plane along the common boundary with the adjoining Metlifecare site. This will potentially result in development(s) with bulk and mass of a scale that is visually dominating and/or creating over-shadowing over the neighbouring sites and comprising the onsite amenity of the residents.	The Precinct should have a height to boundary control plane rising at an angle of 28 degrees between the northwest (315 degrees) and the northeast (45 degrees) and rising at an angle of 45 degrees in all other directions, measuring from 3m above ground level along the boundary where it adjoins the General Residential Zone.
		4.9	4.6.5-7 Permeable surface, site coverage, building height.	Support with amendment	Metlifecare supports the proposed provisions, however, suggests amendments to align them with the approach in Plan Change 12.	<p>Amend Standard 4.6.5 as follows: Add a further specific control for retirement village development in the precinct: ... (iv) Retirement villages: Minimum 20%.</p> <p>Amend Standard 4.6.6 as follows: c. For any apartments <u>or retirement villages</u> in the Te Rapa Racecourse Medium Density Residential Precinct the maximum site coverage is 60%.</p> <p>Retain Standard 4.6.7 as notified.</p>
		4.10	4.8.2 Building setbacks	Support with amendment	seek an amendment to add a General Residential boundary setback which also has the benefit of providing a more appropriate transition from Medium Density Residential Zone to General Residential Zone. We also seek an amendment to reduce or remove the 4.8.2(viii) 30m setback with the adjoining Industrial Zone.	<p>"iv In the Te Rapa Racecourse Medium-Density Residential Precinct the following setbacks apply: (b) side yard =1m minimum, <u>except where it adjoins the General Residential Zone, the minimum setback shall be 1.5m.</u></p> <p>(c) rear yard =1m minimum, <u>except where it adjoins the General Residential Zone, the minimum setback shall be 1.5m.</u></p> <p>Metlifecare seek to reduce or remove the Rule 4.8.2(viii) 30m setback with the adjoining Industrial Zone.</p>
		4.11	4.8.3-4 Public and private	Support in part	Supports the proposed provisions.	Retain as notified.

		4.12	4.8.5 Outdoor living area	Oppose	Outdoor living area standard is not appropriate for a retirement village.	Amend standard 4.8.5(e) as follows (or wording to a similar effect): <u>Outdoor living area standards in 4.8.6(e)(a)-(c) do not apply to retirement villages or rest homes.</u>
		4.13	4.8.6 Service areas	Oppose	Retirement villages and rest homes should be excluded from this standard.	Amend 4.8.6.2 as follows (or wording to a similar effect): <u>The minimum servicing requirements in this table do not apply to retirement villages or rest homes.</u>
		4.14	4.8.10 Outlook space	Oppose in part	Outlook space for a principal living room in a retirement village should be 3n x 3m rather than 4m x 4m.	Amend Standard 4.8.10 as follows: b. The minimum dimensions for a required outlook space are as follows: i. A principal living room (other than in a retirement village unit) must have an outlook space with a minimum dimension of 4 metres in depth and 4 metres in width. <u>ii. a principal living room in a retirement village unit must have an outlook space with a minimum dimension of 3 metres in depth and 3 metres in width.</u> As alternative relief, amend this standard to apply a 3m by 3m outlook space for all residential development.
		4.15	4.8.11-12 Landscaped areas and development layout	Support	Supports the proposed provisions.	Retain as notified.
		4.16	4.11 RD matters of discretion	Support	Supports the proposed provisions.	Retain as notified.
		4.17	Table 23.3(e) Activity status table	Support	Supports the proposed provisions.	Retain as notified.
		4.18	23.7.1 and 23.7.9 Subdivision design standards	Support	Supports the proposed provisions.	Retain as notified.
		4.19	Noise and vibration standards	Support	Supports the proposed provisions.	Retain as notified.
		4.20	1.2.2.24 Landscaping	Support	Supports the proposed provisions.	Retain as notified.
		4.21	P(a) and (b) Assessment criteria	Support	Supports the proposed provisions.	Retain as notified.
5	Murray J. V. Bindon, Lanza International Ltd	5.1	Density	Oppose	The proposed housing density on the West side of the racecourse property is too great and incompatible with the present land use of both the racecourse land and the neighbouring property.	My submission will be satisfied by reducing the area to be occupied by the proposed residential housing so as not to adjoin the present housing at Forest Lake Gardens on the boundary with the racecourse land, and instead to maintain the park area and trees currently on this part of the racecourse property.
		5.2	Trees	Oppose	The area presently contains many large and mature trees in a park setting, at least part of which should be preserved. That area could be quite a small portion of the land outlined in red in Figure No.4 Site Locality, being the irregular outlined part closest to the actual racecourse.	
		5.3	Construction noise and disturbance	Oppose	The process of development of roading, house construction etc., will be a major interference to the enjoyment of the Village residents whose properties will be immediately beside the new development.	

		5.4	Consultation	Oppose	Contrary to the statement Paragraph 9.4 page 43 of the Request for Plan Change there was no consultation with residents in the Forest lake Gardens Village whose houses will be immediately adjacent to the new housing development.	
6	Chartwell Investments Ltd	6.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.	<p>Decline the plan change or:</p> <ol style="list-style-type: none"> 1. Require the applicant to comprehensively evaluate under s32 the consequential effects of the plan change on adjoining Industrial Zone sites in terms of additional restrictions on activities and site development opportunities. 2. Require the applicant to provide an evidence-based land supply analysis to justify the proposed residential land use over other options such as industrial. 3. Amend Policy 4.2.16d, Rule 4.8.2, Rule 4.5.4, 4.8.12, 4.11 a) xxii), and Provision 1.3.3 P - Te Rapa Racecourse Medium Density Residential Precinct to better address reverse sensitivity Matters. 4. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area on the precinct plan to safeguard the adjoining industrial land. Allow for an "Amenity Protection Overlay" to be established on the new industrial area to manage the residential/industrial interface. The submitter prefers the former option. 5. Impose a no-complaints covenant on the record of title associated with any new residential unit.
		6.2	Reverse sensitivity	Oppose	The AEE and acoustic assessment refer to the adjoining land as being occupied by light industrial and commercial activities, however it is zoned industrial and it is important to consider what potential activities could be established on it.	
		6.3	Reverse sensitivity/noise	Oppose	The AA assumes that industrial land to the south will not be subject to large scale industrial use due to small lot sizes and mixed land use. However noisy activities could establish and the submitters site at 6534m2 is not a small one.	
		6.4	Reverse sensitivity	Oppose	Plan provisions to address reverse sensitivity matters are not adequate, i.e.: Effects should be avoided, remedied or mitigated not minimised. The 30m setback is insufficient. The noise sensitive area should be established in its entirety as part of the first stage of development. All development (not just that in the noise sensitive area) should be assessed against assessment criteria P. Assessment criteria does not adequately address general reverse sensitivity matters.	
		6.5	Effects on adjoining development	Oppose	Insufficient consideration in terms of the restrictions on industrial development in district plan rules where it is located close to a residential zone including restrictions on the range of industrial activities and the physical extent to which the site can be developed. This places an unfair burden on the owners and occupiers of this adjoining industrial land.	
		6.6	Residential land supply	Oppose	There is no evidence-based land supply analysis in the AEE.	
		6.7	Transportation	Oppose	Increased traffic on Ken Brown Drive will cause congestion, particularly given the width of the road formation in this location.	
		6.8	Transportation	Oppose	Insufficient parking for the number of houses proposed. Ken Brown Drive will be used for residential parking which will reduce availability for customers and staff of businesses in the area.	
		6.9	Transportation/General	Oppose	The development may lead to an increase in crime and pedestrians may take short cuts through adjoining industrial sites due to limited connectivity.	
7	Takanini Rentors	7.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.	<p>Decline the plan change or:</p> <ol style="list-style-type: none"> 1. Require the applicant to comprehensively evaluate under s32 the consequential effects of the plan change on adjoining Industrial Zone sites in terms of additional restrictions on activities and site development opportunities. 2. Require the applicant to provide an evidence-based land supply analysis to justify the proposed residential land use over other options such as industrial. 3. Amend Policy 4.2.16d, Rule 4.8.2, Rule 4.5.4, 4.8.12, 4.11 a) xxii), and Provision 1.3.3 P - Te Rapa Racecourse Medium Density Residential Precinct to better address reverse sensitivity Matters. 4. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area on the precinct plan to safeguard the adjoining industrial land. Allow for an "Amenity Protection Overlay" to be established on the new industrial area to manage the residential/industrial interface. 5. Impose a no-complaints covenant on the record of title associated with any new residential unit.
		7.2	Reverse sensitivity	Oppose	The AEE and acoustic assessment refer to the adjoining land as being occupied by light industrial and commercial activities, however it is zoned industrial and it is important to consider what potential activities could be established on it.	
		7.3	Reverse sensitivity/noise	Oppose	The AA assumes that industrial land to the south will not be subject to large scale industrial use due to small lot sizes and mixed land use. However noisy activities could establish and the submitters site at 6066m2 is not a small one.	
		7.4	Reverse sensitivity	Oppose	Plan provisions to address reverse sensitivity matters are not adequate, i.e.: Effects should be avoided, remedied or mitigated not minimised. The 30m setback is insufficient. The noise sensitive area should be established in its entirety as part of the first stage of development. All development (not just that in the noise sensitive area) should be assessed against assessment criteria P. Assessment criteria does not adequately address general reverse sensitivity matters.	
		7.5	Effects on adjoining development	Oppose	Insufficient consideration in terms of the restrictions on industrial development in district plan rules where it is located close to a residential zone including restrictions on the range of industrial activities and the physical extent to which the site can be developed. This places an unfair burden on the owners and occupiers of this adjoining industrial land.	
		7.6	Residential land supply	Oppose	There is no evidence-based land supply analysis in the AEE.	

		7.7	Transportation	Oppose	Increased traffic on Sir Tristram Way will cause congestion at the intersection of Te Rapa Road and make it more difficult for traffic existing the service lane.		
		7.8	Transportation	Oppose	Insufficient parking for the number of houses proposed. The service lane could be used for overflow parking and reduce the availability for customers and staff.		
		7.9	Transportation/ General	Oppose	The development may lead to an increase in crime and pedestrians may take short cuts through adjoining industrial sites due to limited connectivity.		
8	Ecostream Irrigation	8.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.		Decline the plan change or: 1. Require the applicant to comprehensively evaluate under s32 the consequential effects of the plan change on adjoining Industrial Zone sites in terms of additional restrictions on activities and site development opportunities. 2. Require the applicant to provide an evidence-based land supply analysis to justify the proposed residential land use over other options such as industrial. 3. Amend Policy 4.2.16d, Rule 4.8.2, Rule 4.5.4, 4.8.12, 4.11 a) xxii), and Provision 1.3.3 P - Te Rapa Racecourse Medium Density Residential Precinct to better address reverse sensitivity Matters. 4. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area on the precinct plan to safeguard the adjoining industrial land. Allow for an "Amenity Protection Overlay" to be established on the new industrial area to manage the residential/industrial interface. The submitter prefers the later option. 5. Impose a no-complaints covenant on the record of title associated with any new residential unit.
		8.2	Reverse sensitivity	Oppose	The AEE and acoustic assessment refer to the adjoining land as being occupied by light industrial and commercial activities, however it is zoned industrial and it is important to consider what potential activities could be established on it.		
		8.3	Reverse sensitivity/noise	Oppose	The AEE assumes that industrial land to the south will not be subject to large scale industrial use due to small lot sizes and mixed land use. However noisy activities could establish and the submitters site at 3033m2 is not a small one.		
		8.4	Reverse sensitivity	Oppose	Plan provisions to address reverse sensitivity matters are not adequate, i.e.: Effects should be avoided, remedied or mitigated not minimised. The 30m setback is insufficient. The noise sensitive area should be established in its entirety as part of the first stage of development. All development (not just that in the noise sensitive area) should be assessed against assessment criteria P. Assessment criteria does not adequately address general reverse sensitivity matters.		
		8.5	Effects on adjoining development	Oppose	Insufficient consideration in terms of the restrictions on industrial development in district plan rules where it is located close to a residential zone including restrictions on the range of industrial activities and the physical extent to which the site can be developed. This places an unfair burden on the owners and occupiers of this adjoining industrial land.		
		8.6	Residential land supply	Oppose	There is no evidence-based land supply analysis in the AEE.		
		8.7	Transportation	Oppose	Increased traffic on Sir Tristram Way will cause congestion at the intersection of Te Rapa Road and make it more difficult for traffic existing the service lane.		
		8.8	Transportation	Oppose	Insufficient parking for the number of houses proposed. The service lane could be used for overflow parking and reduce the availability for customers and staff.		
		8.9	Transportation/ General	Oppose	The development may lead to an increase in crime and pedestrians may take short cuts through adjoining industrial sites due to limited connectivity.		
9	Shane Burnett Housley	9.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.	1. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area. 2. Impose a no-complaints covenant on the record of title associated with any new residential unit.	
		9.2	Effects on adjoining development	Oppose	The plan change will place additional restrictions on the adjoining industrial zoned properties by limiting the types of activities that can establish and reduce the development potential of sites (e.g. building setbacks, height to boundary etc.).		
		9.3	Residential land supply	Oppose	No evidence has been provided to demonstrate there is a greater need for residential land than industrial land in this location.		
		9.4	Transportation	Oppose	The proposal could cause traffic congestion at the intersection of Sir Tristram Way and Te Rapa Road making it difficult to exit the service lane.		

		9.5	Transportation	Oppose	A lack on on-site parking may result in residents parking on the service lane reducing the availability of spaces for customers and staff of the businesses.	
		9.6	Transportation/ General	Oppose	There is potential of increased crime and pedestrians taking short cuts due to the development lacking connectivity.	
10	Denise Allen - Ecostream Irrigation	10.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.	<ol style="list-style-type: none"> 1. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area. 2. Impose a no-complaints covenant on the record of title associated with any new residential unit.
		10.2	Effects on adjoining development	Oppose	The plan change will place additional restrictions on the adjoining industrial zoned properties by limiting the types of activities that can establish and reduce the development potential of sites (e.g. building setbacks, height to boundary etc.).	
		10.3	Residential land supply	Oppose	No evidence has been provided to demonstrate there is a greater need for residential land than industrial land in this location.	
		10.4	Transportation	Oppose	The proposal could cause traffic congestion at the intersection of Sir Tristram Way and Te Rapa Road making it difficult to exit the service lane.	
		10.5	Transportation	Oppose	A lack on on-site parking may result in residents parking on the service lane reducing the availability of spaces for customers and staff of the businesses.	
		10.6	Transportation/ General	Oppose	There is potential of increased crime and pedestrians taking short cuts due to the development lacking connectivity.	
11	Derek Fleet, Purewater Products	11.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.	<ol style="list-style-type: none"> 1. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area. 2. Impose a no-complaints covenant on the record of title associated with any new residential unit.
		11.2	Effects on adjoining development	Oppose	The plan change will place additional restrictions on the adjoining industrial zoned properties by limiting the types of activities that can establish and reduce the development potential of sites (e.g. building setbacks, height to boundary etc.).	
		11.3	Residential land supply	Oppose	No evidence has been provided to demonstrate there is a greater need for residential land than industrial land in this location.	
		11.4	Transportation	Oppose	The proposal could cause traffic congestion at the intersection of Sir Tristram Way and Te Rapa Road making it difficult to exit the service lane.	
		11.5	Transportation	Oppose	A lack on on-site parking may result in residents parking on the service lane reducing the availability of spaces for customers and staff of the businesses.	
		11.6	Transportation/ General	Oppose	There is potential of increased crime and pedestrians taking short cuts due to the development lacking connectivity.	
12	Scott Brocket, Custom Utes	12.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.	<ol style="list-style-type: none"> 1. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area. 2. Impose a no-complaints covenant on the record of title associated with any new residential unit.
		12.2	Effects on adjoining development	Oppose	The plan change will place additional restrictions on the adjoining industrial zoned properties by limiting the types of activities that can establish and reduce the development potential of sites (e.g. building setbacks, height to boundary etc.).	

		12.3	Residential land supply	Oppose	No evidence has been provided to demonstrate there is a greater need for residential land than industrial land in this location.		
		12.4	Transportation	Oppose	The proposal could cause traffic congestion at the intersection of Sir Tristram Way and Te Rapa Road making it difficult to exit the service lane.		
		12.5	Transportation	Oppose	A lack on on-site parking may result in residents parking on the service lane reducing the availability of spaces for customers and staff of the businesses.		
		12.6	Transportation/General	Oppose	There is potential of increased crime and pedestrians taking short cuts due to the development lacking connectivity.		
13	Angela Fisher, NTB Racing	13.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.		<ol style="list-style-type: none"> 1. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area. 2. Impose a no-complaints covenant on the record of title associated with any new residential unit.
		13.2	Effects on adjoining development	Oppose	The plan change will place additional restrictions on the adjoining industrial zoned properties by limiting the types of activities that can establish and reduce the development potential of sites (e.g. building setbacks, height to boundary etc.).		
		13.3	Residential land supply	Oppose	No evidence has been provided to demonstrate there is a greater need for residential land than industrial land in this location.		
		13.4	Transportation	Oppose	The proposal could cause traffic congestion at the intersection of Sir Tristram Way and Te Rapa Road making it difficult to exit the service lane.		
		13.5	Transportation	Oppose	A lack on on-site parking may result in residents parking on the service lane reducing the availability of spaces for customers and staff of the businesses.		
		13.6	Transportation/General	Oppose	There is potential of increased crime and pedestrians taking short cuts due to the development lacking connectivity.		
14	Jason and Melanie Trethowen, Green Ladder Construction Ltd. Trading as Ideal Buildings	14.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.	<ol style="list-style-type: none"> 1. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area. 2. Impose a no-complaints covenant on the record of title associated with any new residential unit. 	
		14.2	Effects on adjoining development	Oppose	The plan change will place additional restrictions on the adjoining industrial zoned properties by limiting the types of activities that can establish and reduce the development potential of sites (e.g. building setbacks, height to boundary etc.).		
		14.3	Residential land supply	Oppose	No evidence has been provided to demonstrate there is a greater need for residential land than industrial land in this location.		
		14.4	Transportation	Oppose	The proposal could cause traffic congestion at the intersection of Sir Tristram Way and Te Rapa Road making it difficult to exit the service lane.		
		14.5	Transportation	Oppose	A lack on on-site parking may result in residents parking on the service lane reducing the availability of spaces for customers and staff of the businesses.		
		14.6	Transportation/General	Oppose	There is potential of increased crime and pedestrians taking short cuts due to the development lacking connectivity.		

15	Mordie Myburgh, Ehome Building Centre	15.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.	<ol style="list-style-type: none"> 1. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area. 2. Impose a no-complaints covenant on the record of title associated with any new residential unit.
		15.2	Effects on adjoining development	Oppose	The plan change will place additional restrictions on the adjoining industrial zoned properties by limiting the types of activities that can establish and reduce the development potential of sites (e.g. building setbacks, height to boundary etc.).	
		15.3	Residential land supply	Oppose	No evidence has been provided to demonstrate there is a greater need for residential land than industrial land in this location.	
		15.4	Transportation	Oppose	The proposal could cause traffic congestion at the intersection of Sir Tristram Way and Te Rapa Road making it difficult to exit the service lane.	
		15.5	Transportation	Oppose	A lack on on-site parking may result in residents parking on the service lane reducing the availability of spaces for customers and staff of the businesses.	
		15.6	Transportation/General	Oppose	There is potential of increased crime and pedestrians taking short cuts due to the development lacking connectivity.	
16	Brent Shadbolt, Miller Electrical Ltd	16.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.	<ol style="list-style-type: none"> 1. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area. 2. Impose a no-complaints covenant on the record of title associated with any new residential unit.
		16.2	Effects on adjoining development	Oppose	The plan change will place additional restrictions on the adjoining industrial zoned properties by limiting the types of activities that can establish and reduce the development potential of sites (e.g. building setbacks, height to boundary etc.).	
		16.3	Residential land supply	Oppose	No evidence has been provided to demonstrate there is a greater need for residential land than industrial land in this location.	
		16.4	Transportation	Oppose	The proposal could cause traffic congestion at the intersection of Sir Tristram Way and Te Rapa Road making it difficult to exit the service lane.	
		16.5	Transportation	Oppose	A lack on on-site parking may result in residents parking on the service lane reducing the availability of spaces for customers and staff of the businesses.	
		16.6	Transportation/General	Oppose	There is potential of increased crime and pedestrians taking short cuts due to the development lacking connectivity.	
17	Greg Roberts, Archery Direct	17.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.	<ol style="list-style-type: none"> 1. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area. 2. Impose a no-complaints covenant on the record of title associated with any new residential unit.
		17.2	Effects on adjoining development	Oppose	The plan change will place additional restrictions on the adjoining industrial zoned properties by limiting the types of activities that can establish and reduce the development potential of sites (e.g. building setbacks, height to boundary etc.).	
		17.3	Residential land supply	Oppose	No evidence has been provided to demonstrate there is a greater need for residential land than industrial land in this location.	
		17.4	Transportation	Oppose	The proposal could cause traffic congestion at the intersection of Sir Tristram Way and Te Rapa Road making it difficult to exit the service lane.	

		17.5	Transportation	Oppose	A lack on on-site parking may result in residents parking on the service lane reducing the availability of spaces for customers and staff of the businesses.	
		17.6	Transportation/ General	Oppose	There is potential of increased crime and pedestrians taking short cuts due to the development lacking connectivity.	
18	Alan Day, A.L. Day trading as Keyport	18.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.	<ol style="list-style-type: none"> 1. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area. 2. Impose a no-complaints covenant on the record of title associated with any new residential unit.
		18.2	Effects on adjoining development	Oppose	The plan change will place additional restrictions on the adjoining industrial zoned properties by limiting the types of activities that can establish and reduce the development potential of sites (e.g. building setbacks, height to boundary etc.).	
		18.3	Residential land supply	Oppose	No evidence has been provided to demonstrate there is a greater need for residential land than industrial land in this location.	
		18.4	Transportation	Oppose	The proposal could cause traffic congestion at the intersection of Sir Tristram Way and Te Rapa Road making it difficult to exit the service lane.	
		18.5	Transportation	Oppose	A lack on on-site parking may result in residents parking on the service lane reducing the availability of spaces for customers and staff of the businesses.	
		18.6	Transportation/ General	Oppose	There is potential of increased crime and pedestrians taking short cuts due to the development lacking connectivity.	
19	Neil Fernworth, Fernworth Investments Ltd	19.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.	<ol style="list-style-type: none"> 1. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area. 2. Impose a no-complaints covenant on the record of title associated with any new residential unit.
		19.2	Effects on adjoining development	Oppose	The plan change will place additional restrictions on the adjoining industrial zoned properties by limiting the types of activities that can establish and reduce the development potential of sites (e.g. building setbacks, height to boundary etc.).	
		19.3	Residential land supply	Oppose	No evidence has been provided to demonstrate there is a greater need for residential land than industrial land in this location.	
		19.4	Transportation	Oppose	The proposal could cause traffic congestion at the intersection of Sir Tristram Way and Te Rapa Road making it difficult to exit the service lane.	
		19.5	Transportation	Oppose	A lack on on-site parking may result in residents parking on the service lane reducing the availability of spaces for customers and staff of the businesses.	
		19.6	Transportation/ General	Oppose	There is potential of increased crime and pedestrians taking short cuts due to the development lacking connectivity.	
20	Graham and Janice Lewis	20.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.	<ol style="list-style-type: none"> 1. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area. 2. Impose a no-complaints covenant on the record of title associated with any new residential unit.
		20.2	Effects on adjoining development	Oppose	The plan change will place additional restrictions on the adjoining industrial zoned properties by limiting the types of activities that can establish and reduce the development potential of sites (e.g. building setbacks, height to boundary etc.).	

		20.3	Residential land supply	Oppose	No evidence has been provided to demonstrate there is a greater need for residential land than industrial land in this location.		
		20.4	Transportation	Oppose	The proposal could cause traffic congestion at the intersection of Sir Tristram Way and Te Rapa Road making it difficult to exit the service lane.		
		20.5	Transportation	Oppose	A lack on on-site parking may result in residents parking on the service lane reducing the availability of spaces for customers and staff of the businesses.		
		20.6	Transportation/General	Oppose	There is potential of increased crime and pedestrians taking short cuts due to the development lacking connectivity.		
21	Douglas Bruce John Hopkins	21.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.		<ol style="list-style-type: none"> 1. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area. 2. Impose a no-complaints covenant on the record of title associated with any new residential unit.
		21.2	Effects on adjoining development	Oppose	The plan change will place additional restrictions on the adjoining industrial zoned properties by limiting the types of activities that can establish and reduce the development potential of sites (e.g. building setbacks, height to boundary etc.).		
		21.3	Residential land supply	Oppose	No evidence has been provided to demonstrate there is a greater need for residential land than industrial land in this location.		
		21.4	Transportation	Oppose	The proposal could cause traffic congestion at the intersection of Sir Tristram Way and Te Rapa Road making it difficult to exit the service lane.		
		21.5	Transportation	Oppose	A lack on on-site parking may result in residents parking on the service lane reducing the availability of spaces for customers and staff of the businesses.		
		21.6	Transportation/General	Oppose	There is potential of increased crime and pedestrians taking short cuts due to the development lacking connectivity.		
22	Gordon Finlay, Katja Hart	22.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.	<ol style="list-style-type: none"> 1. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area. 2. Impose a no-complaints covenant on the record of title associated with any new residential unit. 	
		22.2	Effects on adjoining development	Oppose	The plan change will place additional restrictions on the adjoining industrial zoned properties by limiting the types of activities that can establish and reduce the development potential of sites (e.g. building setbacks, height to boundary etc.).		
		22.3	Residential land supply	Oppose	No evidence has been provided to demonstrate there is a greater need for residential land than industrial land in this location.		
		22.4	Transportation	Oppose	The proposal could cause traffic congestion at the intersection of Sir Tristram Way and Te Rapa Road making it difficult to exit the service lane.		
		22.5	Transportation	Oppose	A lack on on-site parking may result in residents parking on the service lane reducing the availability of spaces for customers and staff of the businesses.		
		22.6	Transportation/General	Oppose	There is potential of increased crime and pedestrians taking short cuts due to the development lacking connectivity.		

23	Gill Adshead, Kereru Partnership	23.1	Reverse sensitivity	Oppose	Potential for reverse sensitivity issues (noise, visual, lighting, odour, vibration) from nearby activities on industrial land.	<ol style="list-style-type: none"> 1. Increase the buffer to 60m and ensure adjoining industrial zoned sites are not disadvantaged by the consequential impacts on development potential. Alternatively provide an industrial zoning in the area identified as the Noise Sensitive Area. 2. Impose a no-complaints covenant on the record of title associated with any new residential unit.
		23.2	Effects on adjoining development	Oppose	The plan change will place additional restrictions on the adjoining industrial zoned properties by limiting the types of activities that can establish and reduce the development potential of sites (e.g. building setbacks, height to boundary etc.).	
		23.3	Residential land supply	Oppose	No evidence has been provided to demonstrate there is a greater need for residential land than industrial land in this location.	
		23.4	Transportation	Oppose	The proposal could cause traffic congestion at the intersection of Sir Tristram Way and Te Rapa Road making it difficult to exit the service lane.	
		23.5	Transportation	Oppose	A lack on on-site parking may result in residents parking on the service lane reducing the availability of spaces for customers and staff of the businesses.	
		23.6	Transportation/General	Oppose	There is potential of increased crime and pedestrians taking short cuts due to the development lacking connectivity.	
24	Kāinga Ora	24.1	Zoning extent	Support in part	The provisions should be streamlined to reflect both what has been proposed through Hamilton's PC12 and the Kāinga Ora submission on PC12.	<ol style="list-style-type: none"> 1. Kāinga Ora seek the Medium Density Zone proposed through PC12, subject to relief sought through the Kāinga Ora submission on PC12, be applied across the Precinct. 2. Kāinga Ora accept that due to the location of the Precinct, there will be specific provisions that relate to staging of development of the Precinct that be included in the District Plan above what is proposed for the Medium Density Residential Zone through PC12.
		24.2	Objectives and policies 4.2.15	Oppose in part	This objective is a duplicate of objective 4.2.2.2 of PC12. In light of this objective, which is partly objective 1 of the NPS-UD, being a requirement of the HSAA, it is not considered necessary to duplicate this. Reference to 3 storeys should be removed as this is inconsistent with the intent of the NPS-UD and the building heights enabled in the Medium Density Residential Zone.	<ol style="list-style-type: none"> 1. Delete objective as this will be addressed through PC12.
		24.3	Objectives and policies 4.2.15a – 4.2.15d	Oppose in part	These policies are duplicates of 4.1.2.3a – 4.1.2.3d proposed through PC12. It is not considered necessary to duplicate these.	<ol style="list-style-type: none"> 1. Delete policies as these will be included through PC12.
		24.4	Objective 4.2.16 and policy 4.2.16a	Oppose in part	Kāinga Ora support the general direction of this objective; however, the intent of this objective and policy 4.2.16a has been addressed through objective 4.3.2.2 and policy 4.3.2.2a and 4.3.2.2c of PC12. It is not considered necessary to duplicate these. Reference to 3 storeys should be removed as this is inconsistent with the intent of the NPS-UD and the building heights enabled in the Medium Density Residential Zone.	<ol style="list-style-type: none"> 1. Delete objective and identified policy as these will be included through PC12.
		24.5	Objectives and policies 4.2.16b – 4.2.16e	Support	Kāinga Ora support the inclusion of policies that are specific to the future development of the Precinct.	<ol style="list-style-type: none"> 1. Retain as notified.
		24.6	Rules 4.5.4 kk - tt	Oppose in part	Consider this unnecessary duplication once PC12 is made operative.	<ol style="list-style-type: none"> 1. Rules 4.5.4 kk – tt be removed to avoid unnecessary duplication with those provisions approved under PC12 once PC13 is incorporated within the District Plan. Subject to the relief sought by the Kāinga Ora PC12 submission.
		24.7	Rule 4.5.4 uu	Support in part	Whilst Kāinga Ora generally understand the potential impacts of noise generated from industrial or major facility zones, upon the residential environment, a full assessment has not been undertaken to justify their implementation. Additionally, the provisions of chapter 25.8 of the Operative District Plan currently regulate noise effects associated with noise sensitive areas and an additional rule framework within the residential chapter would be unnecessary duplication.	<ol style="list-style-type: none"> 1. Create a permitted rule for development within the Noise Sensitive Area that complies with the performance standards relating to noise and amend Rule 4.5.4 uu to refer to development that does not comply with these standards.
		24.8	Rule 4.5.4 vv	Oppose in part	Rule is a duplication of the operative (and unaffected by PC12) rule 22.3h which relates to the construction of buildings within a hazard area. Kāinga Ora consider relying on this existing rule framework to be more appropriate than the introduction of a hazard rule within the residential chapter of the District Plan.	<ol style="list-style-type: none"> 1. Delete the rule as notified and rely on existing rules within the District Plan relating to hazard management.
		24.9	Rule 4.6.3 Height in relation to boundary	Oppose in part	It is questioned whether no HIRB within the Medium Density Zone of the Precinct would deliver appropriate amenity outcomes. Kāinga Ora seek that the HIRB of 6m + 60° is applied, consistent with the relief sought through PC12.	<ol style="list-style-type: none"> 1. Include a HIRB control consistent with the Kāinga Ora relief sought through PC12 for the Medium Density Zone.
		24.10	Rule 4.6.5 Permeable surface	Oppose	This standard is a duplication of standard 4.3.4.3 of PC12.	<ol style="list-style-type: none"> 1. The provisions be deleted, with the Medium Density provisions of PC12 being relied upon for the Precinct once PC13 is incorporated into the District Plan, subject to the relief sought by the Kāinga Ora PC12 submission. 2. In the absence of the standard being deleted as requested above, the additional front yard landscaping

						requirements be deleted.
		24.11	Rule 4.6.6 Site coverage	Support in part	Kāinga Ora support the inclusion of a more enabling site coverage; however, request that this not be associated with apartments and rather, the provisions for building coverage (4.3.4.2) proposed through PC12 be adopted.	1. The provisions be deleted, with the Medium Density provisions of PC12 being relied upon for the Precinct once PC13 is incorporated into the District Plan, subject to the relief sought by the Kāinga Ora PC12 submission.
		24.12	Rule 4.6.7 Building height	Support in part	Consistent with the relief sought by Kāinga Ora through PC12, in order to enable up to 5 storeys within the Medium Density Zone, the permitted height be increased to 18m.	1. The provisions be amended to reflect those proposed by the Kāinga Ora submission through PC12 of an 18m height limit.
		24.13	Rule 4.8.2 Building setbacks	Support in part	Standards 4.8.2vi – vii are duplicates of 4.3.4.6 of PC12, and are consistent with the mandatory MDRS. Kāinga Ora seek clarification on the rationale and methodology behind the selection of a 30m setback through Standard 4.8.2.vii.	1. The provisions be deleted, with the Medium Density provisions of PC12 being relied upon for the Precinct once PC13 is incorporated into the District Plan. Subject to the relief sought by the Kāinga Ora PC12 submission. 2. Clarification and information be provided to justify the requirement for a 30m setback of residential development from the adjoining industrial zoned land.
		24.14	Rule 4.8.3 Interface between public and private	Support in part	Standards 4.8.3fff is a duplicate of 4.3.4.8 of PC12, and are consistent with the mandatory MDRS.	1. Standard 4.8.3fff be deleted once PC13 is incorporated into the District Plan, with the Medium Density provisions of PC12 being relied upon for the Precinct provisions. Subject to the relief sought by the Kāinga Ora PC12 submission.
		24.15	Rule 4.8.5 Outdoor living area	Support in part	Standard 4.8.5(e) a – b, is a duplicate of 4.3.4.9 of PC12, and are consistent with the mandatory MDRS. Standard 4.8.5(e)c has the function of design guidance and should not be included as a standard. Moreover, in the current proposed provisions any dwelling being constructed in the Noise Sensitive Area would require resource consent for a Restricted Discretionary Activity where this could be considered on a case by case basis.	1. Standards 4.8.5(e) a – b be deleted once PC13 is incorporated into the District Plan, with the Medium Density provisions of PC12 being relied upon for the Precinct provisions. Subject to the relief sought by the Kāinga Ora PC12 submission. 2. Delete standard 4.8.5(e)c.
		24.16	Rule 4.8.6 Service Areas	Oppose	Kāinga Ora consider that this standard is better suited as assessment criteria to allow for design flexibility.	1. Delete standard 4.8.6.
		24.17	Rule 4.8.10 Outlook space in the Te Rapa Racecourse Precinct	Support in part	Standards 4.8.10 is a duplicate of 4.3.4.9 of PC12, and are consistent with the mandatory MDRS.	1. Standard 4.8.10 be deleted once PC13 is incorporated into the District Plan, with the Medium Density provisions of PC12 being relied upon for the Precinct provisions. Subject to the relief sought by the Kāinga Ora PC12 submission.
		24.18	4.11 RD – Matters of Discretion and 1.3.3 Guide to Assessment Criteria	Oppose in part	Whilst Kāinga Ora understand that there may be a specific matter of discretion relating to the development of sites within the noise sensitive area, the matter of discretion is detailed through the 'Guide to Assessment Criteria' section of PC13 and reads as design guidance. Consistent with relief sought through PC12, Kāinga Ora opposes the inclusion of Design Guides or design guidelines in the Plan, which act as de facto rules to be complied with.	1. Delete the current guide to assessment criteria 'P' and replace this with: a. Effects of noise arising from the racecourse and/or adjoining industrial zoned land.
		24.19	Rule Table 23.3e	Oppose in part	The proposed rule framework for subdivision for the Medium Density Zone through PC12 should be applied to the Precinct to avoid overly complicated zone provisions. Rule 23.3e.xvi relates to development within the 'low flood hazard area' within the Precinct. The subdivision provisions of both the Operative Plan and PC12 include a rule framework for development in 'All Hazard Areas' and therefore a separate rule for the Precinct is not required to manage flood risk.	1. Replace proposed subdivision provisions with the Medium Density provisions of PC12 and then be deleted once PC13 is incorporated into the District Plan. Subject to the relief sought by the Kāinga Ora PC12 submission. 2. Delete rule 23.3e.xvi.
		24.20	Rule 23.7.1z	Oppose	Kāinga Ora opposes the inclusion of a minimum net site area, and requests that a minimum shape factor as amended, be relied upon instead for General, Medium and High Density Residential Zones. This would sufficiently ensure that smaller vacant lot sizes are not created which might otherwise foreclose multiunit redevelopment of a single site, in accordance with the MDRS and the enabling provisions of the zone.	1. Replace reference to a minimum net site area with a shape factor. Consistent with the Kāinga Ora submission on PC12, the following is recommended: Vacant lot subdivision: Accommodate a rectangle of 8m x 15m
		24.21	Rule 23.7.9	Oppose in part	23.7.9.b - Kāinga Ora generally support the use of rules and standards to manage flood risk; however, Chapter 22 of the Operative Plan (which remains untouched by PC12) contains a rule and standard framework for development within a low flood hazard area and this is not required to be duplicated within the subdivision chapter. Additionally, the standard reads as an information requirement for development rather than a standard itself. 23.7.9.c – Consistent with the Kāinga Ora submission on PC12, Kāinga Ora oppose the inclusion of minimum boundary lengths as the inclusion of such standards place undue restriction on intensification within the Medium Density Zone, which are likely to have frontages at lesser widths either pre or post subdivision.	1. Delete standard 23.7.9.b. 2. Delete standard 23.7.9.c or apply the standard to the creation of vacant allotments only.
		24.22	Rule 25.8.3.7e	Oppose in part	Kāinga Ora consider this standard to be a duplication of amended standard 25.8.3.7a, which seeks to include the Industrial Zones that adjoin the Precinct, in the existing controls of noise levels for these activities, when measured at any point within the boundary of any other site in the residential zones. Notwithstanding the above, it is also noted that standard 25.8.3.7e imposes more lenient maximum noise levels than standard	1. Delete additional standard 25.8.3.7e and rely on the proposed amended version of the existing standard 25.8.3.7a.

					25.8.3.7a.	
25	Stephen Lyons	25.1	Noise/Lighting	Oppose	The setback needs to be 30m minimum to address issues of noise from medium density housing and light pollution.	<ol style="list-style-type: none"> 1. Seek strict conditions regarding off-street carparking. 2. Houses to be owner occupied, no social housing.
		25.2	Transportation	Oppose	Car parks should be provided for every dwelling off-street and sufficient numbers to have no on-street parking/	
		25.3	Transportation	Oppose	Increased traffic on Ken Brown Drive and use of these roads as a short cut will increase the risk of accidents at peak hours.	
		25.4	Transportation	Oppose	Removal of parking from Ken Brown Drive will mean these carparks will park elsewhere as there is insufficient parking in this area.	
		25.5	Social	Oppose	Concerns about Kāinga Ora developing social housing in this location with associated effects on property values, crime, noise, light pollution.	
		25.6	Transportation/ Social	Oppose	Risks to elderly residents from increased traffic and crime.	
26	Phillip Robinson	26.1	Stormwater	Not stated	Concerns about the overland flowpath and low flood hazard area and potential for flooding on the submitters property.	A more in-depth mitigation plan to prevent surface flooding towards 6 Ken Brown Drive. Extend the wetland south-east.