

Further Submission on Variation 1 (Housing Intensification) to the Proposed Waimakariri District Plan by Kāinga Ora – Homes and Communities

Clause 8 of Schedule 1 to the Resource Management Act 1991

To: Development Planning Unit
Waimakariri District Council
Private Bag 1055
Rangiora 7440
Submission lodged via email: developmentplanning@wmk.govt.nz

Name of Further Submitter: Kāinga Ora – Homes and Communities

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

Reasons for further submission

4. The submissions that Kāinga Ora supports or opposes are set out in the table attached as **Appendix A** to this further submission.
5. The reasons for this further submission are:

- (a) The reasons set out in the Kāinga Ora primary submission on the Variation 1.
 - (b) In the case of the Primary Submissions that are opposed:
 - (i) The Primary Submissions do not promote the sustainable management of natural and physical resources and are otherwise inconsistent with the purpose and principles of the Resource Management Act 1991 ("**RMA**");
 - (ii) The relief sought in the Primary Submissions is not the most appropriate in terms of section 32 of the RMA;
 - (iii) Rejecting the relief sought in the Primary Submissions opposed would more fully serve the statutory purpose than would implementing that relief; and
 - (iv) The Primary Submissions are inconsistent with the policy intent of the Kāinga Ora primary submission.
 - (c) In the case of Primary Submissions that are supported:
 - (i) The Primary Submissions promote the sustainable management of natural and physical resources and are consistent with the purpose and principles of the RMA and with section 32 of the RMA;
 - (ii) The reasons set out in the Primary Submissions; and
 - (iii) Allowing the relief sought in the Primary Submissions supported would more fully serve the statutory purpose than would disallowing that relief.
6. Without limiting the generality of the above, the specific relief in respect of each Primary Submission that is supported or opposed is set out in **Appendix A**.
7. Kāinga Ora wishes to be heard in support of its further submission.
8. If others make a similar submission, Kāinga Ora will consider presenting a joint case with them at a hearing.

DATED 21 November 2022

Kāinga Ora – Homes and Communities



Brendon Liggett

Manager – Development Planning

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Appendix A – Further Submission Table

Submitter Number and Name	Submission Point Number	Chapter Topic/ Provision	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
#12 Heritage New Zealand Pouhere Taonga	12.1	Relationships between spatial layers – Table	Support	Supports inclusion of historic heritage items within Medium Density Residential Zone of Rangiora, Kaiapoi and Woodend as qualifying matter.	Oppose	Consistent with its primary submission on Variation 1 Kāinga Ora opposes the heritage QM as currently drafted and considers greater clarity is required as to how the framework applies.	Disallow
#12 Heritage New Zealand Pouhere Taonga	12.4	MRZ – Medium Density Residential Zone MRZ-BFS1	Oppose	Encourages greater consideration to the physical impact of intensification, in terms of increased density and height, on the values of heritage items. While rules within the Historic Heritage Chapter provide protection within identified settings, cumulative intensification on a site beyond the vicinity of an identified setting could be detrimental. Requests that the impact on historic heritage be identified and assessed at the subdivision consent stage in order to determine the appropriateness of three residential units. <i>Amend MRZ-BFS1:</i> <i>"1. There shall be no more than 3 residential units per site, except where:</i> <i>...</i> <i>b. Within the qualifying matters – historic heritage area, a heritage impact assessment has been undertaken by a suitably qualified professional, to ascertain the number of residential units per site."</i>	Oppose	Kāinga Ora considers the submitter has not provided adequate evidence to demonstrate why the heritage QM should be expanded to include sites adjoining those containing heritage items to address cumulative effects. The proposed provision creates uncertainty as it is not clear where and how it would apply, and additional expert assessment would be required for rule interpretation.	Disallow
#12 Heritage New Zealand Pouhere Taonga	12.5	General	Not stated	Agrees that more housing is needed and supports Variation 1's direction for intensification. Waimakariri's history plays an important role in promoting identity, wellbeing, and intergenerational connection. Notes need for robust provisions to protect historic heritage via greater consideration that intensification does not adversely affect the district's heritage. Requests relief to strengthen provisions in relation to management and protection of historic heritage.	Oppose	Kāinga Ora considers the submitter has not provided adequate evidence to demonstrate why the heritage QM should be strengthened.	Disallow
#26 Kim McCracken -on behalf of Doncaster Development Ltd	26.1 - 26.3	- Planning Maps - SD-O2 - General	Amend	Requests a more appropriate provision for medium density housing for Rangiora that only applies to parts of the Rangiora located within walking distance, or 800m, from the town centre, and the balance of residential areas, including 260- 282 Lehman Rd and 32 Parrott Road,	Oppose	Kāinga Ora oppose restricting MDRS or the MRZ to within 800m of the TCZ and other parts of Rangiora remaining as GRZ as a QM. This is not aligned with the directives of the NPS-UD and Housing Supply Act.	Disallow

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				<p>Rangiora ('the site'), being General Residential Zone.</p> <p><i>Allow in full the submitter's submission on the Proposed District Plan and include 260-282 Lehmans Rd and 32 Parrott Road, Rangiora in the General Residential Zone, along with adjacent areas of Rangiora, if Variation 1 is appropriately modified to enable that outcome.</i></p> <p><i>Alternatively, rezone 260-282 Lehmans Rd and 32 Parrott Road, Rangiora to Medium Density Residential Zone if Variation 1 proceeds in approximately its notified form.</i></p>			
#39 Anderson Lloyd - Alex Booker – on behalf of Foodstuffs South Island Ltd and Foodstuffs (South Island) Properties Ltd	39.1 - 39.3	Medium Density Residential Zone - MRZ MRZBFS	Amend	<p>Seeks appropriate recognition for commercial activities, such as supermarkets, and associated effect through the objectives and policies framework to ensure future compatibility between activities; particularly in terms of any effects on residential amenity for new MDRZ developments locating near commercial centres and existing commercial operations to avoid reverse sensitivity issues.</p> <p>Supports the management of zone interfaces and considers this should be managed from both directions to ensure that activities within differing zones are appropriate.</p> <p><i>Amend to include provisions which explicitly recognise the existing amenity effects of adjacent commercial activities to Medium Density Residential Zone (MDRZ); and any other amendments which ensure operational and functional needs of existing lawfully established activities are not hindered or constrained in future by new residential development in the MDRZ.</i></p> <p><i>Amend Variation 1 to reflect the matters raised in submission.</i></p>	Oppose	Kāinga Ora oppose the relief sought as it is not up to residential activities to mitigate the effects of business activities in this context.	Disallow
#42 Transpower New Zealand Ltd - Pauline Whitney	42.1	Relationships between spatial layers – Qualifying Matters	Amend	<p>Considers the reasoning in Table RSL-1 does not make it clear how reducing minimum lot sizes will protect the National Grid. Considers it is unclear why National Grid subdivision corridor is a qualifying matter, and the National Grid Yard is not. The Medium Density Residential Standards allows intensification that may not require subdivision. The National Grid Yard must</p>	Oppose	In accordance with its primary submission on V1 Kāinga Ora oppose the inclusion of Nation Grid Transmission Lines and National Grid Yard setbacks as qualifying matters.	Disallow

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				<p>be included to manage land use in order to apply the National Grid as a qualifying matter and give effect to the National Policy Statement on Electricity Transmission (NPSET).</p> <p><i>Amend Table RSL-1 As follows:</i></p> <p><i>Qualifying matter and area - Electricity</i></p> <p><i>- National grid transmission lines National Grid transmission lines within Medium Density Residential Zone in north-west Rangiora). As mapped in qualifying matter, Nnational Ggrid Ssubdivision Ceorridor and National Grid Yard</i></p> <p><i>Reasoning: Identifies the location of <u>nationally s</u>Significant Electricity Distribution transmission Lines within the Medium Density Residential Zones, and <u>avoids potential effects of subdivision and development on the ability to safely and efficiently operate, maintain, develop and upgrade the National Grid.</u> by imposing minimum setbacks and reducing minimum allotment size ensures the safe or efficient operation of nationally significant infrastructure.</i></p>			
#42 Transpower New Zealand Ltd - Pauline Whitney	42.2	Relationships between spatial layers – Qualifying Matters	Oppose	<p>Opposes lack of restrictions relating to structures and activities in the National Grid Yard. Seeks addition of definition of 'National Grid Yard' to improve clarity regarding this qualifying matter.</p> <p><i>Insert a definition of "NATIONAL GRID YARD":</i></p> <p><i>"means:</i></p> <p><i>a. The area located 12m in any direction from the outer visible edge of a foundation of a National Grid support structure;</i></p> <p><i>b. The area located 10m either side of the centreline of an overhead 66kV National Grid transmission line;</i></p> <p><i>c. The area located 12m either side of the centreline of any overhead 220kV or 350kV National Grid transmission line."</i></p>	Oppose	In accordance with its primary submission on V1 Kāinga Ora oppose the inclusion of Nation Grid Transmission Lines and National Grid Yard setbacks as qualifying matters.	Disallow
#42 Transpower New Zealand Ltd - Pauline Whitney	42.6	EI - Pungao me te hanganga hapori – Energy and infrastructure	Oppose	<p>Opposes lack of inclusion of restrictions that relate to structures and activities in the National Grid Yard. Seeks inclusion of new provisions to</p>	Oppose	In accordance with its primary submission on V1 Kāinga Ora oppose the inclusion of Nation Grid Transmission Lines and National Grid Yard setbacks as qualifying matters.	Disallow

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				<p>provide clarity that land use is also managed as a qualifying matter in the National Grid Yard.</p> <p><i>Amend the 'Activity Rules - Managing effects of activities and development on the National Grid': EI-R51 Activities and development (other than earthworks) within a National Grid Yard</i></p> <p><u>Qualifying matter – National Grid Yard status: PER</u> <u>Where:</u> 1. <u>the activity is not a sensitive activity;</u> 2. <u>buildings or structures comply with NZECP34: 2001 and are:</u> <u>a. for a network utility; or</u> <u>b. a fence not exceeding 2.5m in height above ground level; or</u> <u>c. building alterations or additions to an existing building or structure that do not increase the height above ground level or footprint of the building or structure;</u> 3. <u>A building or structure provided for by (2)(a) to (c) must:</u> <u>a. not be used for the handling or storage of hazardous substances with explosive or flammable intrinsic properties in greater than domestic scale quantities;</u> <u>b. not permanently obstruct existing vehicle access to a National Grid support structure;</u> <u>c. be located at least 12m from the outer visible edge of a foundation of a National Grid support structure, except where it is a fence not exceeding 2.5m height above ground level that is located at least 6 metres from the outer visible edge of a foundation of a National Grid support structure</u> <u>Activity status when compliance not achieved: NC Notification</u> <u>An application under this rule is precluded from being publicly notified but may be limited notified only to Transpower NZ Ltd where the consent authority considers this is required, absent its written approval.</u></p>			
#42 Transpower New Zealand Ltd - Pauline Whitney	42.8	SUB – Wawahia Whenua-Subdivision-Standards	Oppose	<p>Opposes the 200m² minimum allotment size for the National Grid Subdivision Corridor qualifying matter as there is no rationale for how this gives effect to the National Policy Statement on Electricity Transmission and Canterbury Regional Policy Statement, or for how it provides</p>	Oppose	In accordance with its primary submission on V1 Kāinga Ora oppose the inclusion of Nation Grid Transmission Lines and National Grid Yard setbacks as qualifying matters.	Disallow

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				a matter of national significance and ensures the safe or efficient operation of nationally significant infrastructure. <i>Amend minimum allotment size that applies to the National Grid Subdivision Corridor qualifying matter to reflect the minimum area in the Proposed District Plan.</i>			
#42 Transpower New Zealand Ltd - Pauline Whitney	42.11	MRZ – Medium Density Residential Zone MRZ-P1	Amend	Supports MRZ-P1's direction, and notes it reflects Schedule 3A, Part 1, Clause (6)(2)(a) of the Resource Management Act 1991, however requests reference to qualifying matter areas as they directly influence capacity for intensification. <i>Amend MRZ-P1: MRZ-P1 Housing types Enable a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments, while avoiding inappropriate locations, heights and densities of buildings and development within qualifying matter areas as directed by the relevant qualifying matter area provisions.</i>	Oppose	In accordance with its primary submission on V1 Kāinga Ora oppose the inclusion of Nation Grid Transmission Lines and National Grid Yard setbacks as qualifying matters.	Disallow
#42 Transpower New Zealand Ltd - Pauline Whitney	42.24	General	Oppose	Supports the Variation 1 Section 32 report's precautionary approach of including the 39m setback. Generally supports the Section 32 report's analysis of the National Grid as a qualifying matter.	Oppose	In accordance with its primary submission on V1 Kāinga Ora oppose the inclusion of Nation Grid Transmission Lines and National Grid Yard setbacks as qualifying matters.	Disallow
#46 Waka Kotahi NZ Transport Agency- Gemma Kean	46.2	Town Centre Zone – TCZ	Amend	Consider an increased height limit to be included immediately surrounding a town centre zone, to better provide for denser residential development within a walkable catchment, for example, at least 4 storeys. This could be stepped down as the walking catchment extends further out from the towncentre.	Support	In accordance with its primary submission on V1 Kāinga Ora supports the inclusion of increased height limits immediately surrounding the Rangiora TCZ.	Allow
#46 Waka Kotahi NZ Transport Agency- Gemma Kean	46.10	Relationships Between Spatial Noise Layers	Amend	Waka Kotahi seeks further evidence on why a 6m setback for new buildings on sites bordering a strategic or arterial road (state highways) is considered a qualifying matter and why this setback is more appropriate than the required 1.5m standard. Provide further evidence on why a 6m setback for new buildings on sites bordering a strategic	Support in part	In accordance with its primary submission on V1 Kāinga Ora supports that part of submission point 46.10 that queries the need / evidence for an increased 6m road boundary setback as a QM.	Allow

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				or arterial road (state highways) is considered a qualifying matter and why this setback is more appropriate than the required 1.5m standard.			
#46 Waka Kotahi NZ Transport Agency- Gemma Kean	46.11	Noise Noise -R16	Amend	<i>In NOISE-R16, increase the area in which sensitive activities adjacent to strategic and arterial roads are required to be adequately designed and constructed to the relevant noise standards to address reverse sensitivity, from 80m to 100m.</i>	Oppose	In accordance with its primary submission on the PDP and V1 Kāinga Ora does not support the relief sought and does not consider that these issues are qualifying matters.	Disallow
#47 Waimakariri District Council – Tracey Tierney	47.12	MRZ – Medium Density Residential Zone		<p>It is not clear how to treat garages and other non-living accommodation parts of a building under the MDRS. The Proposed District Plan definitions for 'residential activity' are clearly linked to the living accommodation only, which can be interpreted to exempt a garage from consideration under the MDRS, but this may need to be clarified.</p> <p><i>Clarify that the non-living parts of a building are not part of assessment under the relevant MDRS built form standards. This includes attached garages, roof cavity/facade, and foundations.</i></p>	Oppose	<p>Kāinga Ora oppose:</p> <ol style="list-style-type: none"> (1) Any rule change that seeks to remove garages and other accessory buildings from being considered under the MDRS built form standards. (2) The suggestion that roof cavities, facades and foundations are 'non-living accommodation or' non-habitable parts of a building and are therefore not assessed under MDRS built form standards. <p>The proposed approach is not practicable or sensible. In addition, if garages (and accessory buildings) and parts of residential units (facades, roof spaces) are not assessed under the MDRS built form standards, it is not clear what rules would apply as an alternative. It is also not clear what is meant by 'non-living accommodation' or whether this is the same as 'non-habitable'.</p>	Disallow
#49 National Public Health Service / Te Whatu Ora Waitaha – Rosa Verkasalo	49.1	General	Amend	<p>Supports qualifying matters in Variation 1 but requests amendment in relation to the rules applying to mapped natural hazards / flooding.</p> <p>Are concerned about MDRS being introduced into low lying parts of Kaiapoi particularly in high hazard areas. Does not consider that minimum floor levels are enough to mitigate the natural hazard and consider additional assessment should be made of cumulative effects of new development displacing flood waters on to existing dwellings.</p> <p>Concerned that the Proposed Plan recognises the limitations of the wastewater and drainage infrastructure but does not clearly state methods to improve or prepare for increased capacity of infrastructure or redundancy in flood events.</p>	Oppose	<p>To the extent that it is consistent with its primary submission on V1 Kāinga Ora oppose flood maps or overlays being incorporated within the District Plan and instead promote that spatial identification of flood hazard areas should be made available through a set of non-statutory flood hazard maps that can be responsive to dynamic nature of hazards.</p> <p>In relation to minimum floor levels and cumulative effects of displacement Kāinga Ora consider that specified minimum floor levels along with built form standards controlling site coverage are adequate to mitigate effects.</p> <p>In relation to wastewater and drainage limitations and preparing for increased capacity in flood events, this is more appropriately addressed by Council outside of the district plan.</p>	Disallow

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#51 Kiwirail Holdings Ltd – Michelle Grinlinton-Hancock	51.2	MRZ – Medium Density Residential Zone MRZ-BFS5	Amend	<p>Supports the identification of the rail corridor as a qualifying matter and its application to protect sight triangles and setbacks. Supports the retention of TRAN-R21, TRAN-APP7 and MRZ-BFS5. Seeks an amendment to MRZ-BFS5. Considers 5m is an appropriate distance for setbacks from the rail corridor in MRZ-BFS5. However, the proposed matters of discretion in MRZ-BFS5 do not require consideration of the effects where the setback from the rail corridor is infringed. Considers a matter of discretion directing consideration of impacts on the safety and efficiency of the rail corridor is appropriate in situations where the 5m setback standard is not complied with.</p> <p>"MRZ-BFS5 Building and structure setbacks ... <i>RES-MDX - The location and design of the building as it relates to the ability to safely use, access and maintain buildings without requiring access on, above or over the rail corridor.</i> ..."</p>	Oppose	Consistent with its submission on V1 Kāinga Ora oppose the rail corridor being a qualifying matter as the s32 assessment lacks a strong evidence based for the scale of setback as a qualifying matter.	Disallow
#51 Kiwirail Holdings Ltd – Michelle Grinlinton-Hancock	51.3	General	Support	<p>Supports the identification of the rail corridor as a qualifying matter and its application to protect sight triangles and setbacks. Supports the retention of TRAN-R21, TRAN-APP7 and MRZ-BFS5.</p> <p><i>Retain identification of the rail corridor as a qualifying matter.</i></p>	Oppose	Consistent with its submission on V1 Kāinga Ora oppose the rail corridor being a qualifying matter as the s32 assessment lacks a strong evidence based for the scale of setback as a qualifying matter.	Disallow
#53 Resource Management Group – Melanie Foote - on behalf of MainPower New Zealand Ltd	53.1	General	Amend	<p>Seeks to maintain, build, operate, and upgrade the critical network infrastructure in a safe, efficient and effective manner. The electricity distribution network in North Canterbury and Kaikoura regions covers Waimakariri, Hurunui and Kaikoura districts. The electricity distribution network is identified as critical infrastructure, regionally significant infrastructure, is an essential lifeline service and is recognised in the Canterbury Regional Policy Statement (2013). Seeks the Council insert corridor protection rules into the Medium Density Residential zone, or as alternate relief to be clearly cross referenced by rule requirements within the relevant zone</p>	Oppose	Kāinga Ora opposes the inclusion of MainPower's lines as a qualifying matter. They are not Nationally Significant Infrastructure and should not be identified as a qualifying matter in the Variation. Kāinga Ora opposes the relief and changes sought.	Disallow

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				<p>chapters. This submission should be read alongside the original submission on the Proposed District Plan.</p> <p><i>Grant the relief as set out in Appendix One; and or grant any other consequential or similar relief that is necessary to deal with the concerns and issues raised in this submission.</i></p>			
#53 Resource Management Group – Melanie Foote - on behalf of MainPower New Zealand Ltd	53.2	MRZ – Medium Density Residential Zone	Amend	<p>Seeks to insert a new objective and policy to support the introduction of new corridor protection rules for electricity distribution lines with</p> <p><i>Relief as set out in Appendix One; and or grant any other consequential or similar relief that is necessary to deal with the concerns and issues raised in this submission.in the Medium Density Residential Zone.</i></p>	Oppose	Kāinga Ora opposes the inclusion of MainPower's lines as a qualifying matter. They are not Nationally Significant Infrastructure and should not be identified as a qualifying matter in the Variation. Kāinga Ora opposes all of the relief and changes sought in appendix 1.	Disallow
#64 Environment Canterbury Regional Council - Jeff Smith	64.1 – 64.3	Relationships between spatial layers Natural Hazard and Airport QM	Amend	<p>Support the inclusion of natural hazards as a qualifying matter under Variation 1 to the Proposed Waimakariri District Plan. However, concerned regarding the density of development provided for within the areas subject to high hazard risk within Kaiapoi. Note that the qualifying matter for Kaiapoi Area A provides for a minimum allotment area of 200m². While Policy 11.3.1 of the Canterbury Regional Policy Statement (CRPS) provides for development within existing residential areas that may be subject to high hazard risk (provided that the risk is appropriately mitigated), it is considered it would be more appropriate to avoid further intensification in these areas that are subject to high hazard risk (ie. Within the High Hazard Flooding Overlay).</p> <p>Support inclusion of the operative airport noise contour (specifically 50 dBA) as a qualifying matter in the proposed Waimakariri District Plan as part of Variation 1 and consider this gives effect to Policy 6.3.5 of the CRPS.</p> <p><i>Request that the Council quantifies the potential number of new dwellings that could be located in high hazard areas and considers the effects that this will have on increasing the risk from a high hazard flood event. Retain the minimum allotment size for sites within Kaiapoi Area A</i></p>	Oppose	<p>To the extent that it is consistent with its primary submission on V1 Kāinga Ora oppose flood maps or overlays being incorporated within the District Plan and instead promote that spatial identification of flood hazard areas should be made available through a set of non-statutory flood hazard maps that can be responsive to dynamic nature of hazards. Kāinga Ora seek to clarify the minimum site size required in the natural hazard QM. Noting that this should be as specified in SUB-S1 – 200m² (area A and 500m² area B).</p> <p>Kāinga Ora also opposes all provisions related to the Airport Noise Contour in V1 and seeks all relevant airport noise contour provisions in the PDP including objectives, policies, rules and standards (with any associated tables, figures and overlays) are removed from the PDP.</p>	Disallow

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				<i>(and in any other areas) that are affected by the High Hazard Flood Overlay, as was notified in the Proposed District Plan. Further assess these provisions, having regard to the efficiency and effectiveness, to determine whether what is proposed is the most appropriate way of achieving the objectives under section 32 of the Resource Management Act 1991. Retain the operative airport noise contour (specifically 50 dBA) as a qualifying matter.</i>			
#67 Chapman Tripp - Luke Hinchey – on behalf of Retirement Villages Association of New Zealand Incorporated	Submission in its entirety – All Submission Points	Variation 1 – Housing Intensification (Medium Density Residential Standards)	Amend	<p>Seeks that Variation 1 is amended to provide a retirement-village specific framework as follows:</p> <ul style="list-style-type: none"> - The MDRS must be accurately translated into the Proposed Plan. Seek some amendments to the MDRS to ensure they are workable for retirement villages. Seek amendments to other provisions to ensure there is no conflict, overlap or inconsistency with the MDRS. - The objectives and policies of the Plan must enable appropriate accommodation and care for the aging population. - Rules to enable retirement villages in the Medium Density Residential Zone. - Tailored matters of discretion for retirement villages. - Proportionate notification. - Clear, targeted and appropriate development standards. - Providing for retirement villages in commercial, mixed use and other zones. Any alternative or consequential relief to address the matters addressed in this submission. 	Oppose	<p>Kāinga Ora considers that retirement villages are just one housing option and that the objective and policy framework should be encompassing, enabling housing choice and type, rather than being specific to 'retirement villages'. With regard to more specific submission points on rules, built form standards, and matters of discretion, Kāinga Ora considers that RVA's interpretation of how the provisions will apply in practice is unclear and that the changes sought by RVA would result in a more complicated consenting pathway overall, or potentially result in a more restrictive rule framework for other individuals or organisations providing housing options for aging or higher needs populations.</p> <p>RVA have also sought a permitted activity status in zones (such as the NCZ and LCZ), which would be inconsistent with the intent of the zones.</p> <p>Overall, while some of the submission points have merit (and should be more inclusive of other housing options), the amendments sought as a package are overly complicated, and in some cases inappropriate for specific locations.</p>	Disallow.
#77 Beca - Nola Smart - on behalf of Fire and Emergency New Zealand	77.5	MRZ – Medium Density Residential Zone MRS-BFS1 and RES-MD2	Amend	<p>Support in part, however seek additions to the Residential design principles in RES-MD2 to take into account provision for firefighting.</p> <p><i>Amend RES-MD2 (5):</i></p> <p><i>"...</i></p> <p><i>5 c. provides appropriate emergency access to the site</i></p> <p><i>i. any access to on-site alternative firefighting water supply complies with</i></p>	Oppose	Kāinga Ora oppose the additional matters of discretion being added to address issues more appropriately addressed under the Building Act or Transport chapter of the PDP.	Disallow

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				<p><i>SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</i></p> <p><i>ii. developments give effect to the guidance provided in the Firefighting Operations Emergency Vehicle Access Guide.</i></p> <p><i>iii. pedestrian accessways are clear. unobstructed and well-lit.</i></p> <p><i>iv. wayfinding for different properties on a development are clear in day and night.</i></p> <p><i>v. pedestrian accessways have a minimum width of:</i></p> <p><i>a. 3m on a straight accessway.</i></p> <p><i>b. 6.2m on a curved or cornered accessway</i></p> <p><i>c. 4.5m space to position the ladder and perform operational tasks.</i></p> <p><i>..."</i></p>			
#77 Beca - Nola Smart - on behalf of Fire and Emergency New Zealand	77.7	MRZ – Medium Density Residential Zone MRZ-BFS5	Oppose	<p>Concerned by the risk of fire spreading due to setbacks from boundaries. It can inhibit Fire and Emergency personnel from getting to the fire source. Seek an additional matter of discretion to respond to this.</p> <p><i>Include an additional matter of discretion:</i></p> <p><i>RES-MDX Fire risk mitigation incorporated to avoid horizontal spread of fire across boundaries.</i></p>	Oppose	Kāinga Ora oppose the additional matters of discretion being added to address issues more appropriately addressed under the Building Act.	Disallow
#77 Beca - Nola Smart - on behalf of Fire and Emergency New Zealand	77.8	Matters of Discretion for all Residential Zones	Amend	<p>Seek additions to the Residential design principles to take into account provision for firefighting.</p> <p><i>Amend RES-MD2 (5):</i></p> <p><i>"...</i></p> <p><i>5 c. provides appropriate emergency access to the site</i></p> <p><i>i. any access to on-site alternative firefighting water supply complies with</i></p> <p><i>SNZ PAS 4509:2008 New Zealand Fire Service Firefighting Water Supplies Code of Practice.</i></p> <p><i>ii. developments give effect to the guidance provided in the Firefighting Operations Emergency Vehicle Access Guide.</i></p> <p><i>iii. pedestrian accessways are clear. unobstructed and well-lit.</i></p>	Oppose	Kāinga Ora oppose the additional matters of discretion being added to address issues more appropriately addressed under the Building Act or Transport chapter of the PDP.	Disallow

Submitter Number and Name	Submission Point Number	Chapter Topic/ Provision	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				<p>iv. wayfinding for different properties on a development are clear in day and night.</p> <p>v. pedestrian accessways have a minimum width of:</p> <p>a. 3m on a straight accessway.</p> <p>b. 6.2m on a curved or cornered accessway</p> <p>c. 4.5m space to position the ladder and perform operational tasks.</p> <p>..."</p>			
#81 Chapman Tripp - Annabelle Lee - on behalf of Christchurch International Airport Ltd	81.1 – 81.2	Relationships between Spatial Layers	Amend	<p>The planning maps currently show the spatial extent of the Airport Noise Contour qualifying matter. An amendment is required, however, to provide for two density areas beneath the contour; being Area A (600m²) and Area B (300m²), and to recognise the remodelled Annual Average and Outer Envelope contours and the existing operative contour. The densities proposed reflect the density standards of the operative District Plan and are required to ensure appropriate amenity outcomes for residents below the contour and to ensure the effective and efficient operation of the Airport. It is important that the qualifying matter is included on the planning maps with the technically correct label and spatial extent.</p> <p><i>Amend the Airport Noise Contour qualifying matter on the planning map to show two residential density areas beneath the 50dBA Ldn Air Noise Annual Average, Outer Envelope and Operative Contours, as illustrated on the Plan attached as Appendix B(i) (see full submission). Amend the qualifying matter name so that it is correctly identified on the planning maps as follows: "Qualifying Matter Airport Noise Christchurch International Airport 50 dBA Ldn Air Noise Contour".</i></p> <p><i>Retain the "Airport noise" qualifying matter in Table RSL-1. Amend the description and reasoning as follows:</i></p> <p><i>"Qualifying Matter and Area:</i> Airport noise—Christchurch International Airport <u>50 dBA Ldn Air Noise Contour</u> Properties within the Medium Residential Zone of Kaiapoi and within the Christchurch International Airport noise contour.</p>	Oppose	Consistent with its submission on the PDP Kāinga Ora opposes the airport noise contour as a qualifying matter.	Disallow

Submitter Number and Name	Submission Point Number	Chapter Topic/ Provision	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				<i>Reasoning: A spatial overlay within Kaiapoi, reducing development within the Christchurch International Airport 50 dBA Ldn Air Noise Contour airport noise contour to avoid adverse amenity effects on residents, reduce reverse sensitivity effects on Christchurch Airport, and to ensure the efficient operation of nationally significant infrastructure."</i>			
#81 Chapman Tripp - Annabelle Lee - on behalf of Christchurch International Airport Ltd	81.3 – 81.11	Objectives and Policies -Strategic Directions -Subdivision -Residential	Amend	<p>A range of amendments/ relief to the Objectives and Policies across the plan chapters to emphasise the importance of protecting infrastructure (in particular the Christchurch International airport) from adverse reverse sensitivity effects caused by incompatible land use.</p> <p>Consider that within existing residentially zoned areas in Kaiapoi, further intensification should be avoided, beyond that which is already permitted. Seek that the residential density in this area within the 50dB Ldn Air Noise Contour is not increased compared to what is presently allowed. Amendment is required, to provide for two density areas beneath the contour; being Area A (600m²) and Area B (300m²), and to recognise the remodelled Annual Average and Outer Envelope contours and the existing operative contour. The densities proposed reflect the density standards of the operative District Plan and are required to ensure appropriate amenity outcomes for residents below the contour and to ensure the effective and efficient operation of the Airport.</p>	Oppose	Consistent with its submission on the PDP Kāinga Ora opposes the airport noise contour as a qualifying matter.	Disallow
#81 Chapman Tripp - Annabelle Lee - on behalf of Christchurch International Airport Ltd	81.12 – 81.13	MRZ – Medium Density Residential Zone MR2 and MR18	Amend	<p>An amendment is required, to provide for two density areas beneath the contour; being Area A (600m²) and Area B (300m²), and to recognise the remodelled Annual Average and Outer Envelope contours and the existing operative contour.</p> <p><i>Amend MRZ-R2: "1. Within the Christchurch International Airport 50 dBA Ldn Air Noise Contour as shown on the planning maps the minimum net site area is as</i></p>	Oppose	Consistent with its submission on the PDP Kāinga Ora opposes the airport noise contour as a qualifying matter.	Disallow

Submitter Number and Name	Submission Point Number	Chapter Topic/ Provision	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				<p><u>follows:</u> <u>Kaiapoi Area A 600m2</u> <u>Kaiapoi Area B 300m2.</u> <u>Activity status when compliance not achieved:</u> <u>1. Within the Christchurch International Airport Air Noise Contour – RDIS; with the Matters of discretion restricted to RES-MD15 Effects from qualifying matters – airport noise</u> <u>2. as set out in the relevant built form standards.</u> <u>Notification: An application for a residential unit that does not comply with MRZ-R2 clause 1 shall be limited notified at least to Christchurch International Airport (absent its written approval)."</u></p> <p>Support Restricted Discretionary activity status for Medium Density Residential Zone rule MRZ-R18 Multi Unit Residential Development but seek an additional matter of discretion for proposals that are located within the 50dBA Ldn Air Noise Contour.</p> <p><u>Amend MRZ-R18:</u> <u>"1. a design statement shall be provided with the application; or</u> <u>2. where the site is located within the Christchurch International Airport 50 dBA Ldn Air Noise Contour."</u></p> <p><u>Include an additional matter of discretion:</u> <u>"RES-MD15 – Effects from qualifying matters - airport noise."</u></p> <p><u>Amend the notification clause:</u> <u>"An application for a restricted discretionary activity under this rule is precluded from being publicly notified or limited notified, except where:</u> <u>1. the application site is located with the Christchurch International Airport 50 dBA Ldn Air Noise Contour, in which case any application shall be limited notified at least to Christchurch International Airport (absent its written approval)."</u></p>			
#81 Chapman Tripp - Annabelle Lee - on behalf of Christchurch International Airport Ltd	81.14 and 81.15	MRZ – Medium Density Residential Zone MRZ-BFS1 – 2	Amend	Amend the notification provisions of Medium Density Residential Zone built form standard MRZ-BFS1 by adding an additional clause as follows: "An application for the construction of residential units that does not comply with MRZ-BFS1 clause 1.a. shall be limited notified at least	Oppose	Consistent with its submission on the PDP Kāinga Ora opposes the airport noise contour as a qualifying matter.	Disallow

Submitter Number and Name	Submission Point Number	Chapter Topic/ Provision	Submission Position	Summary of Decision Requested (Decision Sought)	Kāinga Ora response (support or oppose)	Kāinga Ora reasons	Decision(s) sought (allow or disallow)
				<p><i>to Christchurch International Airport (absent its written approval)."</i></p> <p><i>In Medium Density Residential Zone built form standard MRZ-BFS2, include an additional matter of discretion as follows: "RES-MD15 – Effects from qualifying matters – airport noise".</i></p> <p><i>Amend the notification provision as follows: "Refer to notification status in MRZ-BFS1, except where an application for residential units does not comply with MRZ-BFS2 clause 1 shall be limited notified at least to Christchurch International Airport (absent its written approval)."</i></p>			
#81 Chapman Tripp - Annabelle Lee - on behalf of Christchurch International Airport Ltd	81.16	MRZ – Medium Density Residential Zone RESMD15	Support	Support Matter of Discretion RES-MD15 for the Residential Zones.	Oppose	Consistent with its submission on the PDP Kāinga Ora opposes the airport noise contour as a qualifying matter.	Disallow

Emily Cameron

From: Mel Rountree <Mel.Rountree@kaingaora.govt.nz>
Sent: Monday, 21 November 2022 4:27 pm
To: Development Planning Mailbox
Cc: Brendon Liggett; developmentplanning
Subject: Waimakariri PDP, V1 and V2 - Further Submissions
Attachments: 20221121 Kainga Ora Waimakariri - Variation 1 Further Submission vSIGNED.pdf; 20221121 Kainga Ora Waimakariri - Variation 2 Further Submission vSIGNED.pdf; 20221121 Kainga Ora Waimakariri - PDP Further Submission vSIGNED.pdf

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Kia ora

Please find attached, further submissions on the PDP and Variations 1 and 2 from Kāinga Ora Homes and Communities.

We would appreciate if you could please acknowledge receipt of this submission. Thank you.

Ngā mihi | Kind regards

Mel



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