

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
TW Property	General //	142.1	Amend	Submitter notes that the full submission relates to the PDP and specific provisions. Submitter provides and introduction and background to it's role in Hawke's Bay Propoerty Development to indicate that it is well informed on challenges and opportunities for delivering housing within the provincial property market. Considers that the economic realities of delivering housing projects within Napier should be better understood by Council to ensure the provisions will reduce uncertainty and avoid additional time and costs to projects, in order to assist achieving the desired outcomes for the city. TW Property Generally supports the introduction of the Medium and High Density residential zone however considers that both these, and the General Residential Zone, include onerous standards and assessment criteria which contribute to the inefficient development of a site and/or add time and cost to a project during reporting and processing of consents. Refer to original submission for full details.	Submitter notes that the relief sought across the PDP reflect themes of supporting increased opportunities for Medium and High Density Housing, reducing uncertainty, ensuring workable standards.No specific relief sought. Refer to original submission for full details.
TW Property	Planning Maps //	142.2	Support	Supports the introduction of a Medium Density Residential Zone and High Density Residential Zone within Napier and the areas that this has been applied to throughout the City. Notes that Napier currently has a housing shortage and that Medium and high density housing can provide additional supply as well as greater choice in both housing typologies and price points to the market. Considers that Providing greater zoned opportunities for medium and high density housing allows the market to respond and deliver housing in appropriate locations and demand sectors. The more land available for medium and high residential housing, the more likely it is that this typology can be delivered at a scale that meets demands or need. Does not consider that the market is ready for six story developments such as what has been proposed via the High Density Residential Zone, However, submitter is not in opposition to it as it allows the market to grow into this in the future.	Retain MRZ and HRZ zones and their spatial extent on the planning maps.
TW Property	General //	142.3	Amend	Considers that increasing the certainty of gaining planning approvals is key to enable developers to actually deliver housing developments (including medium and high density housing). Considers that reducing risk (including time and cost risk) to projects will encourage developers to move from traditional infill and/or greenfield subdivisions to deliver duplex and terraced housing typologies within Napier across all market/occupancy sectors. Sufficient certainty is required at the early due diligence stage to make property acquisition and investment decisions. The submitter accepts that medium and higher density residential development will likely require resource consent applications, particularly for larger scale development, as not all potential matters may be adequately addressed through permitted activity standards. Considers that the flexibility of a resource consent process can also enable developments to better respond to site specific characteristics rather than compliance with a plethora of onerous standards. Considers that the resource consent process should provide as much certainty and clarity for all involved, including developers and also existing neighbouring property owners and communities. The submitter notes the current uncertainty in the design and resource consent process for housing projects in Napier is the implication of minimum floor levels in relation to flooding, whether or not a flood hazard is actually shown over the subject site. Considers that a flood level prescribed by Council is often applied as a consent condition following the assessment of an application with the resulting heights having potential to implicate compliance with height in relation to boundary standards and affect other factors in relation to building and landscape design.	Retain the MRZ and HRZ Zones. Retain the Restricted Discretionary Activity status for residential activities where activity conditions are met. Delete assessment criteria relating to Hastings Residential Intensification Guide. Clearly define the flood level and the areas which this applies to on the planning maps.
TW Property	GRZ - General Residential Zone /GRZ - General Residential Zone - Rules Table /GRZ-R1: Residential units and residential activity	142.4	Support	Supports the retention of a Restricted Discretionary Activity Status where activity conditions are not met, including new houses on small vacant sites and/or multiple residential units on a site. Also support the default non-notification for applications under this rule on both a public and limited basis.	Retain GRZ-R1.

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TW Property	GRZ - General Residential Zone /Assessment criteria /GRZ-AC1: Residential units (GRZ-R1); Minor residential units (GRZ-R3); Relocated buildings (GRZ-R9); Retirement village premises (GRZ-R10)	142.5	Oppose	Opposes Assessment Criteria matters GRZ-AC1(c), (g) and (s) where an assessment of the development's consistency with the Hastings Residential Intensification Design Guide (the Design Guide) is required. Considers that this is both onerous on top of the already extensive assessment criteria proposed for the General Residential Zone and introduces a level of subjectivity when considering an application against the Design Guide, both of which increase cost and uncertainty to any resource consent application. The proposed list of assessment criteria are already considered to cover a number of the matters outlined in the Design Guide and requiring applications to make an assessment against the 60 page Design Guide documents introduces additional cost to developers by way of additional assessment for both the applicant Planners and Council Planners and Urban Design teams. Considers that through requiring an assessment of this document introduces a layer of subjectivity to the consenting process increasing uncertainty. Seeks that the use of the Hastings Intensification Design Guide is as a non-statutory guidance document only and the use of this as a statutory assessment process is not supported.	Delete Assessment Criteria matters GRZ-AC1(c), (g) and (s). Retain the remaining assessment criteria (a), (b), (d) – (f), (h) – (r) and (t).
TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Rules Table /MRZ-R1: Residential units and residential activity	142.6	Support	Supports the retention of a Restricted Discretionary Activity Status where activity conditions are not met. Supports the default non-notification for applications under this rule on both a public and limited basis.	Retain Rule MRZ-R1.
TW Property	MRZ - Medium Density Residential Zone /Assessment criteria /MRZ-AC1: Residential units (MRZ-R1); Relocated buildings (MRZ-R5); Retirement village premises (MRZ-R6)	142.7	Oppose	Considers that the Hastings Residential Intensification Design Guide would introduce an additional layer of subjectivity and uncertainty if introduced into the statutory assessment process. Seeks that these should be retained as a non-statutory guidance document only, with resource consents to be assessed against the concise 'material' development criteria in the District Plan.	Delete Assessment Criteria MRZ-AC1(f) and (r). Retain remaining assessment criteria (a) – (e), (g) – (q) and (s).
TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Rules Table /HRZ-R1: Residential units and residential activity	142.8	Support	Supports the retention of a Restricted Discretionary Activity Status where activity conditions are not met, including new houses on small vacant sites and/or multiple residential units on a site. Also supports the default non-notification for applications under this rule on both a public and limited basis.	Retain HRZ-R1.
TW Property	HRZ - High Density Residential Zone /Assessment criteria /HRZ-AC1: Residential units (HRZ-R1); Relocated buildings (HRZ-R5); Retirement village premises (HRZ-R6)	142.9	Oppose	Opposes the introduction of the Hastings Residential Intensification Design Guide into the statutory assessment process. Considers it is a useful tool to achieve quality design outcomes, however would introduce an additional layer of subjectivity and uncertainty. Seeks its retention as a non-statutory guidance document only, with resource consents to be assessed against concise 'material' development criteria in the District Plan.	Delete Assessment Criteria HRZ-AC1(g) and (q). Supports the retention of the remaining assessment criteria (a) – (f), (h) – (p), (r) and (s).
TW Property	MUZ - Mixed Use Zone /Assessment criteria /MUZ-AC1: New buildings not meeting permitted standards (MUZ-R1)	142.10	Oppose	Opposes the introduction of the Hastings Residential Intensification Design Guide into the statutory assessment process. Considers it is a useful tool to achieve quality design outcomes, however would introduce an additional layer of subjectivity and uncertainty. Seeks its retention as a non-statutory guidance document only, with resource consents to be assessed against concise 'material' development criteria in the District Plan.	Delete assessment Criteria MUZ-AC1(b), (i) and (j). Retain the remaining assessment criteria for new buildings being (a), (c) – (h).

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TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /HRZ-S2: Height in relation to boundary	142.11	Amend	<p>Considers that it is important that the standards appropriately facilitate the outcomes sought by Council for the City and further enable efficient development of sites while achieving onsite amenity and maintain an appropriate and transparent standard of amenity for adjacent residents. Seeks to ensure that the standards across the relevant zones (GRZ, MRZ, HRZ, MUZ) are workable and provide for practical outcomes when actually implemented onsite. The submission requests amendments or the removal of standards which are overly onerous for residential development or which result in contradicting outcomes to other standards, therefore seeking a consistent approach within each Zone and across the Plan. Additionally, with respect to the High Density Residential Zone, the submission points seek amendments to the standards to allow for the optimal uptake of denser typologies to maximise use of this rezoned land for these purposes. The submitter notes concern regarding implementation by Councils Engineering Team of minimum floor levels above flood hazards across large areas of Napier and the implications this has on complying with height in relation to boundary standards. In some cases, sites are required to be raised 0.9m above existing ground level which compromises the ability to develop within a site, particularly for two-story dwellings. Notes that examples in parts of residential Christchurch which became susceptible to flooding were mapped within a Flood Management Area, and within these areas they are now exempt from complying with standard height in relation to boundary controls. Instead, the applicable recession planes within these areas are now determined as if the ground level at the relevant boundary was the minimum floor level set by the flood hazard (or natural ground level, whichever is higher).</p> <p>Considers this is an appropriate approach for Napier flood hazards as development of the site is not restricted by the requirement to raise the site for flood hazard protection.</p>	Amendment to the HRZ standards to allow for the optimal uptake of denser typologies to maximise use of this rezoned land for these purposes. Seeks that standards across the relevant zones (GRZ, MRZ, HRZ, MUZ) are workable and provide for practical outcomes when actually implemented onsite. Seeks Amendments or the removal of standards which are overly onerous for residential development or which result in contradicting outcomes to other standards, therefore seeking a consistent approach within each Zone and across the Plan.
TW Property	GRZ - General Residential Zone /GRZ - General Residential Zone - Standards Table /General	142.12	Support	<p>Supports the standards of the General Residential Zone, Medium Density Residential Zone, and the High Density Residential Zone, except where otherwise stated through specific submission points. Considers that it is important that the standards appropriately facilitate the outcomes sought by Council for the City and further enable efficient development of sites while achieving onsite amenity and maintain an appropriate and transparent standard of amenity for adjacent residents. Seeks to ensure that the standards across the relevant zones (GRZ, MRZ, HRZ) are workable and provide for practical outcomes when actually implemented onsite.</p>	Retain standards in the GRZ, MRZ and HRZ except where amendments are sought through separate submission points.
TW Property	Planning Maps //	142.13	Amend	<p>Submitter notes a current area of uncertainty experienced in the design and resource consent process for housing projects in Napier is the implication of minimum floor levels in relation to flooding, whether or not a flood hazard is actually shown over the subject site. A flood level prescribed by Council is often applied as a consent condition following the assessment of an application with the resulting heights having potential to implicate compliance with height in relation to boundary standards and affect other factors in relation to building and landscape design. Seeks clarification of this flood level and requests that it is clearly set out in the relevant standards and linked to planning maps for spatial clarity of application, and/or through an amendment to the code of practice.</p>	Map minimum floor level requirements on the planning maps, or alternative relief.
TW Property	GRZ - General Residential Zone /GRZ - General Residential Zone - Standards Table /GRZ-S2: Height in relation to boundary	142.14	Amend	<p>Notes that large areas of residentially zoned land in Napier are being required by the Councils Engineering Team to lift finished floor levels significantly higher than existing ground level in order to meet minimum floor level requirements due to the raised flood level. As a result, this compromises the ability to develop a site within the height in relation to boundary parameters. Seeks that the height in relation to boundary line starts at the same level on the boundary as the minimum floor level applied to the site. Refers to Christchurch District Plan</p> <p>(See original submission for full detail)</p>	Amend so that the height in relation to boundary line starts at the same level on the boundary as the minimum floor level applied a site at the relevant boundary.
TW Property	GRZ - General Residential Zone /GRZ - General Residential Zone - Standards Table /GRZ-S6: Impervious area	142.15	Support	<p>Supports an impervious area of 70% within the General Residential Zone.</p>	Retain GRZ-S6
TW Property	GRZ - General Residential Zone /GRZ - General Residential Zone - Standards Table /GRZ-S8: Fences and walls	142.16	Support	<p>Supports the retention of a fence and wall height of 2m within side and rear yards as significant fill required to be placed in residential sites to achieve minimum floor levels above flood hazards, this is to provide for retaining and an adequate fence height above this retaining while still falling within the permitted height threshold.</p>	Retain GRZ-S8

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TW Property	GRZ - General Residential Zone /GRZ - General Residential Zone - Standards Table /GRZ-S10: Windows to the street	142.17	Amend	Opposes standard as it is currently worded. As street facing dwellings typically contain a garage (which can occupy up to 50% of a street facing façade), requiring 20% of glazing to then occupy the remaining portion of frontage would compromise the insulation and energy efficiency goals sought by the Building Code. Notes the requirement for passive surveillance and streetscape connectivity, however considers that the requirement for 20% glazing of the full façade is not appropriate in situations where there is a street facing garage. For multi-unit developments, the assessment criteria will apply in addition to the standard. Further flexibility is sought.	Amend the standard to only require 20% of the façade beyond any area occupied by a garage door to be in glazing, or similar alternative relief.
TW Property	GRZ - General Residential Zone /GRZ - General Residential Zone - Standards Table /GRZ-S11: Outdoor living space	142.18	Amend	Supports the outdoor living space standard and the reduction in area from the ODP for ground floor units to 20m ² however considers that the wording provided for GRZ-S11(1)(b) is unclear as notified this appears to contradict the requirement for a 20m ² living space. Also the wording of GRZ-S11(3) and seeks further clarity around the interpretation of this standard.	Amend GRZ-S11(1)(b) to provide better clarity around this provision i.e. whether the 20m ² can be cumulatively met through a combination of balcony and ground floor outdoor living space. Further, amend or delete GRZ-S11(3) as further clarity is required.
TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S1: Height	142.19	Support	Supports the maximum height limit of 12m for the Medium Density Residential Zone.	Retain MRZ-S1.
TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S2: Height in relation to boundary	142.20	Amend	Considers that the height in relation to boundary of 4m + 45 degrees is too restrictive to allow for the efficient uptake of medium density residential development constructed up to a height of 12m. A 4m + 45 degree recession plane requires a three story building to be pushed off the boundary by 8m. Noting the width of most residential sites within Napier, this excludes a large portion of each lot and significantly reduces the buildable area. This is additionally exacerbated via the requirement to raise sites above flood levels applied by NCC. Seeks amendment so the height in relation to boundary line starts at the same level on the boundary as the minimum floor level applied to the site. Refers to approach in Christchurch District Plan (See original plan for details). Also considers that the Height in Relation to Boundary provision does not consider duplex dwellings or terraced houses on adjacent sites which are sought to be enabled in the objectives and policies for the zone.	Amend to relax height in relation to boundary rules within the Medium Density Residential Zone to allow the efficient development of these sites. Consider conjoined duplex/terraced houses on separate lots whereby the height in relation to boundary standards are not required to be applied. Amend so that the height in relation to boundary plane is taken from the minimum floor level at the relevant boundary.
TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S4: Other yards	142.21	Amend	Supports a setback distance of 1m from side and rear boundaries however no provision is made for duplex or terrace housing typologies.	In order to give effect to Policy MRZ-P1, amend MRZ-S4 to remove the requirement to comply with yard setbacks between conjoined dwellings across boundaries.
TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S5: Building coverage	142.22	Support	Supports a building coverage of 50% within the Medium Density Residential Zone.	Retain MRZ-S5.
TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S6: Impervious area	142.23	Support	Supports an impervious area of 80% for the Medium Density Residential Zone.	Retain MRZ-S6.
TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S7: Landscaped area	142.24	Support	Supports a landscaped area of 20% for the Medium Density Residential Zone.	Retain MRZ-S7.
TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S8: Fences and walls	142.25	Support	Supports the retention of a fence and wall height of 2m within side and rear yards. Supports as significant fill required to be placed in residential sites to achieve minimum floor levels above flood hazards to provide for retaining and an adequate fence height above this retaining while still falling within the permitted height threshold.	Retain MRZ-S8.
TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S9: Garages and accessory buildings	142.26	Oppose	Opposes standard as notified as it has the potential to significantly restrict the ability to provide two-three level terraced houses facing the street, which may limit the viability of achieving this form. Also considers that the standard will produce generic outcomes providing for facades with no modulation. Design assessment criteria can address the relationship of multiple dwellings to the street without requiring this restrictive control.	Delete MRZ-S9.
TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S10: Windows to the street	142.27	Amend	Opposes this standard as it is currently worded. Considers that as street facing dwellings typically contain a garage (which can occupy up to 50% of a street facing façade), requiring 20% of glazing to then occupy the remaining portion of frontage would compromise the insulation and energy efficiency goals sought by the Building Code (noting that 40% of this area would require glazing). Notes the requirement for passive surveillance and streetscape connectivity, however considers that the requirement for 20% glazing of the full façade is not appropriate in situations where there is a street facing garage. For multi-unit developments, the assessment criteria will apply in addition to the standard therefore further flexibility is sought.	Amend the standard to only require 20% of the façade beyond any area occupied by a garage door to be in glazing.

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TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S11: Outdoor living space	142.28	Oppose	Opposes the wording of MRZ-S11(3) and seeks further clarity around the interpretation of this standard.	Amend or delete MRZ-S11(3) as further clarity is required.
TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S12: Residential outlook space	142.29	Oppose	Opposes standard as notified. Considers that the requirement for a principle living room of 6m by 4m is more onerous than what is required for the outdoor living space of 20m ² and a minimum dimension of 3m and therefore these provisions do not align in terms of achieving optimal site layout. Opposes the requirement for a 3m by 3m outlook space for all other habitable rooms as this will effectively require all dwellings to be pushed off the boundary by 3m which is more onerous than the 1m setback requirement and is not practical.	Amend so that the outlook space for a principle living room is amended to better align with the requirements of outdoor living space. Also amend so that the outlook space for all other rooms is reduced to 1m by 1m to enable flexibility in site design and alignment with the side and rear yard standards.
TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S13: Minimum residential unit size	142.3	Support	Supports the minimum residential unit sizes notified.	Retain MRZ-S13.
TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S14: Maximum building length	142.31	Oppose	Opposes the standard in its current form and recommends that it needs to be rewritten to achieve a better outcome and avoid inefficient development on sites. Requiring a break in the building reduces the effective building area on a site. Considers that the assessment criteria for multi-unit developments can adequately address building bulk.	Amend the standard to remove the requirement for building separation and instead require architectural relief for 4m of the building to break up the continuous length; or delete the standard and utilise assessment criteria to assess design matters.
TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /HRZ-S1: Height	142.32	Support	Supports a maximum height of 19.5m within the High Density Residential Zone.	Retain HRZ-S1.
TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /HRZ-S2: Height in relation to boundary	142.33	Amend	Considers that the height in relation to boundary requirement too restrictive to allow for the efficient uptake of high density residential development constructed up to a height of 19.5m. the current recession planes push buildings of this height off the boundary considerably, therefore reducing the effective building area on a site. This is additionally exacerbated via the requirement to raise sites above flood levels applied by NCC. Requests that the height in relation to boundary line starts at the same level on the boundary as the minimum floor level applied to the site. Refers to implementation in the Christchurch District Plan. Refer to original submission for further detail. Considers that the Height in Relation to Boundary provision does not consider duplex dwellings or terraced houses on adjacent sites which are sought to be enabled in the objectives and policies for the zone.	Amend height in relation to boundary rules to be relaxed within the Medium Density Residential Zone to allow the efficient development of these sites. Seeks that consideration is given to conjoined duplex/terraced houses on separate lots whereby the height in relation to boundary standards are not required to be applied. Amend so that height in relation to boundary plane is taken from the minimum floor level at the relevant boundary.
TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /HRZ-S3: Front yards	142.34	Amend	Considers that the 1.5m setback is too onerous for apartment buildings which are better suited to be constructed up to a front boundary.	Amend so that the provisions consider a separate standard for apartment buildings whereby a front yard setback is not required.
TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /HRZ-S4: Other yards	142.35	Amend	Supports a setback distance of 1m from side and rear boundaries however no provision is made for duplex or terrace housing typologies.	Delete the requirement to comply with yard setbacks between attached dwellings across boundaries to give effect to Policy HRZ-P1
TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /HRZ-S5: Building coverage	142.36	Amend	Opposes a building coverage of 50% for apartment style buildings. Considers that the standard as notified compromises the optimal uptake of land for residential purposes to maximise the yield anticipated by the zone.	Amended and increase standard to better reflect the anticipated building typologies for the zone.
TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /HRZ-S6: Impervious area	142.37	Support	Supports an impervious area of 80% for the High Density Residential Zone.	Retain HRZ-S6
TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /HRZ-S8: Fences and walls	142.38	Support	Supports the retention of a fence and wall height of 2m within side and rear yards to provide for retaining and an adequate fence height above this retaining while still falling within the permitted fence height threshold, due to significant fill required to be placed in residential sites to achieve minimum floor levels above flood hazards.	Retain HRZ-S8.
TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /HRZ-S9: Garages and accessory buildings	142.39	Oppose	Opposes standard as notified as it has the potential to significantly restrict the ability to provide two-three level terraced houses facing the street, which may limit the viability of achieving this form. Also considers that the standard will produce generic outcomes providing for facades with no modulation. Design assessment criteria can address the relationship of dwellings to the street without requiring this restrictive control.	Delete HRZ-S9.

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TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /HRZ-S10: Windows to the street	142.40	Amend	Opposes standard as it is currently worded. Considers that as street facing dwellings typically contain a garage (which can occupy up to 50% of a street facing façade), requiring 20% of glazing to then occupy the remaining portion of frontage would compromise the insulation and energy efficiency goals sought by the Building Code (noting that 40% of this area would require glazing). Notes appreciation for the requirement for passive surveillance and streetscape connectivity, however considers that the requirement for 20% glazing of the full façade is not appropriate in situations where there is a street facing garage. For multi-unit developments, the assessment criteria will apply in addition to the standard. Further flexibility is sought.	Amend the standard to only require 20% of the façade beyond any area occupied by a garage door to be in glazing.
TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /HRZ-S11: Outdoor living space	142.41	Oppose	Opposes the wording of HRZ-S11(3) and seeks further clarity around the interpretation of this standard.	Amend or delete HRZ-S11(3) as further clarity is required.
TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /HRZ-S12: Residential Outlook space	142.42	Oppose	Opposes the wording of the standard as notified for principle living spaces in that it requires an outlook which is more onerous than the outdoor living space requirement of 20m2.	Amend so that the outlook space for a principal living room is consistent of that with the outdoor living space.
TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /HRZ-S13: Minimum residential unit size	142.43	Support	Supports the minimum residential unit size as notified.	Retain HRZ-S13.
TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /HRZ-S14: Maximum building length	142.44	Oppose	Opposes the standard in its current form and recommends that it needs to be rewritten to achieve a better outcome and avoid inefficient development on sites. Requiring a break in the building reduces the effective building area on a site.	Amend to remove the requirement for building separation and instead focus on architectural relief for 4m of the building to break up a continuous length or delete the standard and utilise assessment criteria to assess design matters.
TW Property	MUZ - Mixed Use Zone /MUZ - Mixed Use Zone - Standards Table /MUZ-S6: Impervious area	142.45	Amend	Considers that Most of the sites within the proposed Mixed Use Zone are currently covered by 100% impervious surfaces. Opposes this standard in its current form as it places further restriction on sites compared to their existing situation. The stormwater rules will apply to any additional impervious area in this zone which will assist in managing stormwater discharge to the network without needing to further restrict impervious areas in this zone.	Amend to provide for 100% impervious area.
TW Property	MUZ - Mixed Use Zone /MUZ - Mixed Use Zone - Standards Table /MUZ-S7: Landscaped area	142.46	Oppose	Opposes as very few sites within the proposed Mixed Use Zone area have any landscaping currently. Considers that requiring 20% landscaping is a significant and onerous change to how these sites can be developed. Considers that landscape and streetscape character outcomes are better addressed through the Yards and Frontages Rules as they have been applied in Standards MUZ-S3 and MUZ-S4 respectively	Delete this landscaping requirement to better reflect the existing character of the sites within this zone.
TW Property	MUZ - Mixed Use Zone /MUZ - Mixed Use Zone - Standards Table /MUZ-S8: Open space	142.47	Oppose	Opposes the wording of MUZ-S8(3) and seeks further clarity around the interpretation of this standard.	Amend or delete MUZ-S8(3) as further clarity is required.
TW Property	MUZ - Mixed Use Zone /MUZ - Mixed Use Zone - Standards Table /MUZ-S13: Garages	142.48	Oppose	Opposes this standard as notified as it has the potential to significantly restrict the ability to provide two-three level terraced houses facing the street, which may limit the viability of achieving this form. Considers that the standard will produce generic outcomes providing for facades with no modulation. Design assessment criteria can address the relationship of dwellings to the street without requiring this restrictive control.	Delete MUZ-S13.
TW Property	SUB - Subdivision /SUB - Subdivision - Standards Table /SUB-S1: Minimum allotment sizes - residential	142.49	Amend	Supports the removal of minimum lot sizes for subdivision of an approved (or concurrent) resource consent for multiple residential units. Minimum lot sizes should apply to vacant lot subdivisions only. Subdivision of approved or concurrent land use consents should not require revisiting internal non-compliances with development standards, providing that subdivision boundaries are consistent with nominal boundaries that we request be shown on the land use consent plans. Assessing technical infringements where there is no material impact on the approved design or effects on the environment (including onsite and neighbouring property amenity), adds cost and time to subdivision consenting processes without adding any value in terms of outcomes.Opposes a non-complying activity status for residential subdivisions which do not comply with minimum allotment sizes. Considers that the notified rule framework seems overly restrictive for enabling smaller houses on smaller lots of 250m2 – 350m2 which are not considered to be inconsistent with the residential environment. Notes that assessing activities as a non-complying activity increases reporting costs and risk for developers.	Retain provisions enabling no minimum lot size where subdivision gives effect to an approved or concurrent land use consent for multiple residential units. Amend the activity status for residential subdivisions which do not comply with minimum lot size to be a Discretionary Activity
TW Property	SUB - Subdivision /SUB - Subdivision - Standards Table /SUB-S13: Stormwater treatment and disposal	142.50	Amend	Considers that the 'treatment' of stormwater could mean multiple things and is open to interpretation. Also considers that this standard is not consistent with the new stormwater rules within the SW chapter and does not support this standard as it has been notified.	Amend Rule to provide greater clarity around what it is trying to achieve and to obtain consistency of stormwater requirements throughout the Plan.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
TW Property	TPT - Transport /TPT - Transport - Rules Table /TPT-R2: New or modified vehicle access and crossings onto a state highway or arterial road	142.51	Amend	Seeks clarification around this rule and which roads it applies to as the new Rooding Hierarchy contained within Appendix 18 have re-labelled road classifications.	Amend notified rule or roading hierarchy in order to obtain consistency throughout the Plan and avoid confusion.
TW Property	TPT - Transport /TPT - Transport - Standards Table /TPT-S5: Vehicle access (restrictions)	142.52	Amend	Seeks clarification around this standard and which classification of roads it applies to as the new Rooding Hierarchy contained within Appendix 18 have re-labelled road classifications.	Amend notified standard or roading hierarchy in order to obtain consistency throughout the Plan and avoid confusion.
TW Property	TPT - Transport /TPT - Transport - Standards Table /TPT-S5: Vehicle access (restrictions)TPT-S6: Manoeuvring	142.53	Amend	Seeks clarification around this standard and which classification of roads it applies to as the new Rooding Hierarchy contained within Appendix 18 have re-labelled road classifications.	Amend notified standard or roading hierarchy in order to obtain consistency throughout the Plan and avoid confusion.
TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /General	142.54	Support	Supports the standards of the General Residential Zone, Medium Density Residential Zone, and the High Density Residential Zone, except where otherwise stated through specific submission points. Considers that it is important that the standards appropriately facilitate the outcomes sought by Council for the City and further enable efficient development of sites while achieving onsite amenity and maintain an appropriate and transparent standard of amenity for adjacent residents. Seeks to ensure that the standards across the relevant zones (GRZ, MRZ, HRZ) are workable and provide for practical outcomes when actually implemented onsite.	Retain standards in the GRZ, MRZ and HRZ except where amendments are sought through separate submission points.
TW Property	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /General	142.55	Support	Supports the standards of the General Residential Zone, Medium Density Residential Zone, and the High Density Residential Zone, except where otherwise stated through specific submission points. Considers that it is important that the standards appropriately facilitate the outcomes sought by Council for the City and further enable efficient development of sites while achieving onsite amenity and maintain an appropriate and transparent standard of amenity for adjacent residents. Seeks to ensure that the standards across the relevant zones (GRZ, MRZ, HRZ) are workable and provide for practical outcomes when actually implemented onsite.	Retain standards in the GRZ, MRZ and HRZ except where amendments are sought through separate submission points.
TW Property	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /General	142.56	Amend	Considers that it is important that the standards appropriately facilitate the outcomes sought by Council for the City and further enable efficient development of sites while achieving onsite amenity and maintain an appropriate and transparent standard of amenity for adjacent residents. Seeks to ensure that the standards across the relevant zones (GRZ, MRZ, HRZ, MUZ) are workable and provide for practical outcomes when actually implemented onsite.	Seeks that standards across the relevant zones (GRZ, MRZ, HRZ, MUZ) are workable and provide for practical outcomes when actually implemented onsite. Seeks Amendments or the removal of standards which are overly onerous for residential development or which result in contradicting outcomes to other standards, therefore seeking a consistent approach within each Zone and across the Plan.
TW Property	GRZ - General Residential Zone /GRZ - General Residential Zone - Standards Table /General	142.57		Considers that it is important that the standards appropriately facilitate the outcomes sought by Council for the City and further enable efficient development of sites while achieving onsite amenity and maintain an appropriate and transparent standard of amenity for adjacent residents. Seeks to ensure that the standards across the relevant zones (GRZ, MRZ, HRZ, MUZ) are workable and provide for practical outcomes when actually implemented onsite.	Seeks that standards across the relevant zones (GRZ, MRZ, HRZ, MUZ) are workable and provide for practical outcomes when actually implemented onsite. Seeks Amendments or the removal of standards which are overly onerous for residential development or which result in contradicting outcomes to other standards, therefore seeking a consistent approach within each Zone and across the Plan.
TW Property	MUZ - Mixed Use Zone /MUZ - Mixed Use Zone - Standards Table /General	142.58	Amend	Considers that it is important that the standards appropriately facilitate the outcomes sought by Council for the City and further enable efficient development of sites while achieving onsite amenity and maintain an appropriate and transparent standard of amenity for adjacent residents. Seeks to ensure that the standards across the relevant zones (GRZ, MRZ, HRZ, MUZ) are workable and provide for practical outcomes when actually implemented onsite.	Seeks that standards across the relevant zones (GRZ, MRZ, HRZ, MUZ) are workable and provide for practical outcomes when actually implemented onsite. Seeks Amendments or the removal of standards which are overly onerous for residential development or which result in contradicting outcomes to other standards, therefore seeking a consistent approach within each Zone and across the Plan.