

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Keith Peacock	SUB - Subdivision / /	164.1	Oppose	<p>Opposes Large Lot Residential Zoning of Kent Terrace, Lakeview Terrace, Ridgeway Terrace and considers it should be zoned General Residential. The first matter of this submission is whether a specific individual zoning for the Kent terrace and surrounds is needed. Notes that this is the only Large Lot Residential Zone in the city and encompasses only a small area in Taradale. Considers that there is no need for this additional zone and the area should be zoned General Residential. Kent Terrace and the surrounding hills are fundamental residential in nature given the scale and intensity of development in this area over the last 1 years. Also notes that rezoning would see consistency of zoning and character with the balance of Kent Terrace and adjoining Cumberland Rise. Considers that the sites are fully serviced by Councils 3-Waters infrastructure and it is considered that the most effective use of the land resource and services network is to see a reduction in the average lot size restrictions of the proposed zone. The most effective way to achieve this is zoning the area General Residential.</p> <p>It will allow for higher density in part and reduce pressure on urban sprawl and development over the Heretaunga Plains Soil resource and align with HPUDS and specific infill development targets set out in this strategy. Considers that the 'special zone' is proposed as a means to maintain status quo. It is argued that there is no need for this special zone in the pending Proposed District Plan as the area is now developed in a nature similar to other parts of Taradale which are simply zoned General Residential (Churchill Drive, Cumberland Rise, etc). The decision to maintain a larger lot sizes does not match other council decisions to see higher density in existing and proposed residential areas including the recent Mission development plan change. Considers that traditionally larger lot residential zones are generally a requirement for non-reticulated sites, such as Jervois Town. which is not the case with this area. Notes the importance of having resilient housing options needs to be taken into account and that this area of the Taradale Hills provides for resilient housing elevated above any flood risk, and is not situated on liquefiable land. Considers that zoning this land General Residential also aligns with the Mission Hills Development Zoning located in similar topography.</p>	Amend zoning for Kent Terrace, Lakeview Terrace and Ridgeway Terrace Large Lot Residential Zone to a General Residential Zone. Refer to original submission for attached map.

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Keith Peacock	SUB - Subdivision /SUB - Subdivision - Standards Table / SUB-S1: Minimum allotment sizes - residential	164.2	Oppose	<p>Opposes Average Lot Size. Considers that if Large Lot Residential Zoning is necessary, changes should be made. Considers that Kent Terrace and the surrounding hills are fundamental residential in nature given the scale and intensity of development in this area over the last 10 years. Notes the sites are fully serviced by Councils 3-Waters infrastructure and it is considered that the most effective use of the land resource and services network is to see a reduction in the average lot size restrictions of the proposed zone. The most effective way to achieve this is zoning the area General Residential. By removing the average lot size requirement it will allow for increased density in part and reduce pressure on urban sprawl and development over the Heretaunga Plains Soil resource and align with HPUDS and specific infill development targets set out in this strategy. The decision to maintain a larger lot sizes does not match other council decisions to see higher density in existing and proposed residential areas including the recent Mission development plan change. Traditionally larger lot residential zones are generally a requirement for non-reticulated sites, such as Jervois Town which is not the case with this area. Considers that a minimum lot size of 1000m2 still achieves, for the most part, larger than average residential lot sizes and this matches the majority of sites fronting the Kent Terrace in this zone.</p> <p>Site topography will still dictate lot sizes. The land use rules and standards will ensure the bulk and location of proposed dwellings will still maintain the separation of dwellings and maintain 'open nature' of the area. The average lot size in this zone is already well below the 3,000m2 average that the zone is trying to achieve through this rule. Therefore the rule does not even reflect the reality of the 'existing environment' and is trying to achieve a lower density than existing. Notes the importance of having resilient housing options needs to be taken into account and this area of the Taradale Hills provides for resilient housing elevated above any flood risk, and is not situated on liquefiable land. Considers that zoning this land General Residential also aligns with the Mission Hills Development Zoning located in similar topography. Considers that there is an opportunity here to see additional development in this area of Napier in a sustainable manner, and there is real need to use our existing land and services resource efficiently and efficiently. A bespoke zone for this area is not considered necessary, but if councils considers it is, we ask that the average lot size is removed as to still allow for the effective development of the remaining larger lots to help provide housing for a growing city.</p>	Remove the proposed 3,000m2 average lot size requirement and the minimum lot size of 1000m2 remain to achieve the larger lot size envisaged by the zoning.

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Keith Peacock	LLRZ - Large Lot Residential Zone /LLRZ - Large Lot Residential Zone - Rules Table / LLRZ-R5: Grazing of livestock	164.3	Oppose	Opposes as stock are the best and cheapest form of grass and weed control on hillside sites, and a number of these sites have land that cannot currently be developed or easily maintained. Grazing by stock is the best means to manage grass and weeds and mitigate fire risk. Considers that this method of property maintenance should not be subject to gaining a Discretionary Consent at the cost of the land owner and with no certainty of being granted. Notes that this matter is managed under the NCC Animal Control Bylaw and requiring a Resource Consent is an unnecessary duplication of regulation while Bylaws manage nuisance effects.	Delete Rule relating to Grazing of stock
Keith Peacock	LLRZ - Large Lot Residential Zone /LLRZ - Large Lot Residential Zone - Rules Table / LLRZ-R4: Minor residential unit	164.4	Oppose	Opposes as the discretion rule not permitting minor dwellings is overly restrictive. Notes that properties in this zone are relatively large sections and often are purchased or owned by families wanting to provide additional space for family or relatives in a minor stand-alone dwelling. If these lots can provide for a minor dwelling that complies with the bulk, location and landscaping standards (which manage the amenity effects) then the activity of building a minor dwelling should be a permitted activity.	Amend activity status for Minor Residential Unit from Discretionary activity to permitted activity subject to bulk and location standards.
Keith Peacock	LLRZ - Large Lot Residential Zone /LLRZ - Large Lot Residential Zone - Rules Table / LLRZ-R8: Visitor accommodation	164.5	Oppose	Opposes as the discretion rule not permitting visitor accommodation is overly restrictive. Notes that properties in this zone are relatively large sections and open themselves to opportunity to provide temporary visitor accommodation, especially for local events such as the Mission Concert and Church Road concerts. Considers that it also allows flexibility for landowners to utilise surplus units, rooms or sleepouts for accommodation and support the wider tourism market. It is also considered that the zone is suitable for type of activity at a suitable scale. If properties in this zone can provide for a visitor accommodation activity that complies with the bulk, location and landscaping standards (which manage the amenity effects) then the activity should be a permitted activity.	Amend activity status for Visitor Accommodation from Discretionary activity to permitted activity subject to bulk and location standards.