

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Tawanui Developments Limited	General /General /General	247.1	Amend	The submitter seeks to develop land at 195 and 215 Riverbend Road, 20 Waterworth Avenue, and 75 and 91 Waverley Avenue, for the purposes of a comprehensively designed medium density residential development with a new local commercial centre, parks, stormwater attenuation and treatment areas and all supporting infrastructure, and requests changes throughout the PDP to facilitate this.	Amend the planning maps to introduce a new Development Area for the land (and appropriate underlying zoning) to facilitate a medium density residential development (Inferred).
Tawanui Developments Limited	Definitions /General /General	247.2	Oppose	Considers that including a definition that guides users in respect of what constitutes a habitable room. Guidance on this matter is contain in Part 14 of the National Planning Standards	Amend the definitions to include the definition set out in Part 14 of the National Planning Standards to be included within The Plan.
Tawanui Developments Limited	SUB - Subdivision /Issues /General	247.3	Amend	Consider amendments to this section of The Plan as it is considered that in some instances, the approach to subdivision does not align well with the provisions of Policy 6 in the National Policy Statement on Urban Development 2020; that Policy recognising the changing character in communities through ongoing urban development.	Amend the sections to clearly reflect the intent of Policy 6 of the NPS-UD 2020 in the context of subdivision.
Tawanui Developments Limited	SUB - Subdivision /Objectives /General	247.4	Oppose	Considers that there is significant repetition of issues and confusing terminology which does not assist in clarity and useability of the Plan. The effectiveness of the provisions is significantly diluted through this current structure and are considered to be too vague to provide clear guidance.	Amend to provide clarity and clear guidance on key matters and amending text to reflect appropriate management of effects as that term is defined within s.3 of The Act.
Tawanui Developments Limited	SUB - Subdivision /SUB - Subdivision - Rules Table /SUB-R2: Boundary adjustment	247.6	Oppose	Opposes the discretionary activity status of a proposed subdivision activity that fails to achieve all performance standards.	Amend the status of a proposed subdivision activity that fails to achieve all performance standards to restricted discretionary.
Tawanui Developments Limited	SUB - Subdivision /SUB - Subdivision - Rules Table /SUB-R4: Subdivision to create conservation lots for the protection of scheduled heritage items, archaeological sites, and/or sites of significance to Māori	247.7	Oppose	Opposes a discretionary activity status for proposed subdivision activities that fail to achieve all performance standards.	Amend the status of a proposed subdivision activity that fails to achieve all performance standards to restricted discretionary.
Tawanui Developments Limited	SUB - Subdivision /SUB - Subdivision - Rules Table /SUB-R1: Subdivision	247.8	Oppose	Opposes the provisions of SUB-R1A and SUB-R2A and SUB-R5 as that standard seeks reserves control over the Purpose, Objectives and Policies of the relevant Zone, Precinct and Development Area.	Amend to remove reference to (1) in SUB-R1A and SUB-R2A and SUB-R5.
Tawanui Developments Limited	SUB - Subdivision /SUB - Subdivision - Rules Table /SUB-R2: Boundary adjustment	247.9	Oppose	Opposes the provisions of SUB-R1A and SUB-R2A and SUB-R5 as that standard seeks reserves control over the Purpose, Objectives and Policies of the relevant Zone, Precinct and Development Area.	Amend to remove reference to (1) in SUB-R1A and SUB-R2A and SUB-R5.
Tawanui Developments Limited	SUB - Subdivision /SUB - Subdivision - Rules Table /SUB-R5: Cross lease title to freehold subdivision	247.10	Oppose	Opposes the provisions of SUB-R1A and SUB-R2A and SUB-R5 as that standard seeks reserves control over the Purpose, Objectives and Policies of the relevant Zone, Precinct and Development Area.	Delete reference to (1) in SUB-R1A and SUB-R2A and SUB-R5.
Tawanui Developments Limited	SUB - Subdivision/SUB - SUB - Subdivision - Standards Table/SUB-S1: Minimum allotment sizes - residential	247.11	Oppose	Opposes the non-complying category being applied to SUB-S1.	Amend SUB-S1 to provide for a restricted discretionary activity status.
Tawanui Developments Limited	SUB - Subdivision/SUB - Subdivision - Standards Table/SUB-S1: Minimum allotment sizes - residential	247.12	Oppose	Oppose the vacant lot subdivision standard set out in SUB-S1 as it does not distinguish between the GRZ and MRZ vacant site subdivision standards. It is reasonable for a differentiation in standards for these zones as a vacant site area of 250sqm is entirely appropriate within which to design and develop a complying townhouse at a density which better reflects the intent of the MRZ outcomes in contrast to the GRZ.	Amend SUB-S1 to reflect a vacant site net site area of 250sqm for the MRZ.
Tawanui Developments Limited	SUB - Subdivision/SUB - Subdivision - Standards Table/SUB-S5: Minimum allotment sizes - development areas	247.13	Oppose	Consider recognising the Riverbend Road Development Area within Rule SUB-S5	Amend to include the Riverbend Road Development Area to the provisions of SUB-S5.
Tawanui Developments Limited	SUB - Subdivision/SUB - Subdivision - Standards Table/SUB-S6: Number of allotments	247.14	Oppose	Opposes this standard as the inference of this rule is to limit the number of sites that can be created before a proposal default to a more arduous consent category.	Delete SUB-S6.
Tawanui Developments Limited	SUB - Subdivision /SUB - Subdivision - Standards Table /SUB-S11: Shape factor	247.15	Oppose	Opposes the introduction of a shape factor in SUB-S11 as that does not distinguish between MRZ and GRZ typologies and also conflicts with the provisions of SUB-S1 which requires a demonstration that a dwelling can be built that complies with the relevant standards.	Delete SUB-S11.
Tawanui Developments Limited	SUB - Subdivision /Assessment criteria /SUB-AC1: General, applies to all subdivision (including boundary adjustments)	247.16	Oppose	Opposes the provisions of SUB-AC1 as (a) reserves control over the Purpose, Objectives and Policies of the relevant Zone, Precinct and Development Area.	Amend SUB-AC1 to remove (a) and reconfigure the balance of the provisions.
Tawanui Developments Limited	SUB - Subdivision /Assessment criteria /SUB-AC2: Subdivision of three sites or more in residential, rural, commercial, and industrial zones (Number of allotments created SUB-S6)	247.17	Oppose	Opposes the provisions of SUB-AC2 as (a) reserves control over the Purpose, Objectives and Policies of the relevant Zone, Precinct and Development Area.	Delete SUB-AC2(a)
Tawanui Developments Limited	SUB - Subdivision /Assessment criteria /SUB-AC8: All infringements to standards (SUB-S1 - SUB-S18)T	247.18	Oppose	Opposes SUB-AC8 as it is not an appropriate provision as currently drafted as it partially applies a test in (c) that is applicable only to a non-complying activity under The Act and is onerous for a subdivision which infringes a standard in SUB-S1 -SUB-S18. It adds no substantive guidance to an assessment of an application.	Delete SUB-AC8.
Tawanui Developments Limited	MRZ - Medium Density Residential Zone /Objectives /General	247.19	Amend	Amend to improve useability and clarity changes sought to the Objectives framework contained within MRZ-01 to MRZ 05.	Amend to focus on salient matters.

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Tawanui Developments Limited	MRZ - Medium Density Residential Zone /Policies /MRZ-P4: Quality living environments - within the site	247.20	Amend	Considers changes to Policy MRZ-P4 to encourage and enable more creative design in respect of open space areas their options for configuration. This better reflects the degree of flexibility that is inherently required to achieve the outcomes sought by MRZ-01 and MRZ-02.	Amend MRZ-P4 to enable a greater degree of flexibility in the provision of open space areas.
Tawanui Developments Limited	MRZ - Medium Density Residential Zone /Policies /MRZ-P4: Quality living environments - within the site	247.21	Amend	Considers that MRZ-P4 should be amended to reflect that parking on site is no longer required by virtue of the NPS-UD 2020 for a Tier 2 Urban Area (of which Napier is one such area). The amendment sought seeks to clarify that this Policy is of relevance where off-street parking is provided, while recognising that accessible parking remains a mandatory requirement.	Amend to reflect the requirements of the NPS-UD 2020 more clearly.
Tawanui Developments Limited	MRZ - Medium Density Residential Zone /Policies /MRZ-P7: Sustainable design and infrastructure	247.22	Amend	Considers an amendment necessary to MRZ-P7 are sought that better reflect the definition of effects as set out in s.3 of the RMA (meaning of effect)	Amend MRZ-P7 to relate to the definition in s.3 of the RMA
Tawanui Developments Limited	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Rules Table /MRZ-R3: Home business	247.23	Oppose	Opposes Rule MRZ-R3 (4)(b) as there appears to be no substantive rationale to the inclusion of this provision within the context of an urban zone enabling medium density housing typologies relative to home businesses.	Delete this provision.
Tawanui Developments Limited	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S4: Other yards	247.25	Amend	Considers an amendment necessary to MRZ-S4 to make it clear that the intent of the rule only applies to existing boundaries (i.e., the "parent title") of a development site and not to any new boundary created by a subdivision as part of a medium density development.	Amend the rule to reference that internal new boundaries created as part of the terrace or multi-unit development are excluded.
Tawanui Developments Limited	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S11: Outdoor living space	247.26	Oppose	Considers amendments to Rule MRZ-S11 are required as there appear to be editing errors in the standards relating to ground floor outdoor living space requirements. The standards in MRZ-S11 include requirements for roof terraces, balconies which are captured by the ground floor residential unit requirements. MRZ-S11 (3 and 4) are unduly restrictive in the context of seeking to achieve a compact urban form and will restrict the potential development of sites in an efficient manner.	Amend to clarify ground floor standards and delete MRZ-S11(3 and 4).
Tawanui Developments Limited	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S11: Outdoor living space	247.27	Oppose	Considers an amendment to include graphics or an explanatory statement would assist in useability and understanding. Amend MRZ-S11 to avoid a conflict with MRZ-S12. By achieving the outdoor living space standards contained within Rule MRZ-S11, that does not seemingly readily enable a denser form of development given the minimum dimensions imposed on the Outlook Space rules in MRZ-S12.	Amend the rule to achieve better alignment with yards and outdoor space requirements.
Tawanui Developments Limited	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S12: Residential outlook space	247.28	Oppose	Considers amendments to this standard should include graphics or an explanatory statement would assist in useability and understanding. Perceived conflict with MRZ-S11. By achieving the outdoor living space standards contained within Rule MRZ-S11, that does not seemingly readily enable a denser form of development given the minimum dimensions imposed on the Outlook Space rules in MRZ-S12.Considers amendments are necessary to MRZ-S12 to ensure that every habitable room has an outlook control but that there is the ability to provide flexibility in design outcomes depending on the design.	Amend the rule to achieve better alignment with yards and outdoor space requirements.
Tawanui Developments Limited	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S14: Maximum building length.	247.29	Oppose	Opposes the controls in MRZ-S14 relating to maximum building length as these do not enable flexibility in responding to site characteristics and enable efficient use of the land resource in all instances. The standard is considered unduly restrictive.	Delete this rule.
Tawanui Developments Limited	MRZ - Medium Density Residential Zone /Assessment criteria /General	247.30	Amend	Supports the provisions set out in MRZ-AC1 to MRZ-AC 5 subject to minor amendments, the intent of which is to clarify some aspects of the currently proposed rule drafting and terminology.	Amend provisions to aid in clarity and focus on salient matters clearly.
Tawanui Developments Limited	MRZ - Medium Density Residential Zone /Assessment criteria /MRZ-AC1: Residential units (MRZ-R1); Relocated buildings (MRZ-R5); Retirement village premises (MRZ-R6)General	247.31	Amend	Considers the renumbering of MRZ-AC1 as (a). only directs the user to the provisions of (b). in the corresponding provisions below. The use of numerical sub-headings is also suggested for user readability (as per the balance of the provisions).	Delete (a) and reformat.
Tawanui Developments Limited	LCZ - Local Centre Zone /Objectives /General	247.32	Amend	Considers minor amendments are necessary to aid in clarity and certainty. The language used is at times vague and creates uncertainty for users of the Plan.	Amend provisions to aid in clarity and focus on salient matters clearly.
Tawanui Developments Limited	LCZ - Local Centre Zone /Policies /General	247.33	Amend	Considers minor amendments are necessary to aid in clarity and certainty. The language used is at times vague and creates uncertainty for users of the Plan.	Amend provisions to aid in clarity and focus on salient matters clearly.
Tawanui Developments Limited	LCZ - Local Centre Zone /LCZ - Local Centre Zone - Rules Table /LCZ-R1: New buildings	247.34	Oppose	Considers that LCZ-R1 renders new buildings accommodating permitted activities as restricted discretionary is too restrictive. Seeks this as a permitted activity.	Amend LCZ-R1 to a Permitted Activity status if all the relevant standards can be achieved.
Tawanui Developments Limited	LCZ - Local Centre Zone /LCZ - Local Centre Zone - Rules Table /LCZ-R2: Additions and alterations	247.35	Oppose	Opposes the Restricted Discretionary Activity status for extensions to existing buildings that are over 25sqm.	Delete or amend this rule to make such activities permitted.
Tawanui Developments Limited	LCZ - Local Centre Zone /LCZ - Local Centre Zone - Rules Table /LCZ-R10: Car parking areas	247.36	Oppose	Opposes the imposition of a Restricted Discretionary consent for an at grade car park, considers this to be too restrictive.	Delete or amend this rule to make such activities Permitted.
Tawanui Developments Limited	LCZ - Local Centre Zone /LCZ - Local Centre Zone - Rules Table /General	247.37	Oppose	Opposes the lack of permitted activity rules for EV charging stations and ancillary infrastructure.	Seeks to include provision for EV charging stations and ancillary infrastructure.

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Tawanui Developments Limited	LCZ - Local Centre Zone /Assessment criteria /General	247.38	Oppose	Considers amendments necessary to refine and tighten the consideration of activities against the Assessment Criteria within the Plan and reflect the amendments and changes sought in this submission. In particular, it is not considered reasonably necessary for a Permitted Activity which infringes a standard in The Plan, to fall to automatically being assessed again against the relevant Objectives and Policies of The Plan as a Restricted Discretionary Activity.	Seeks the inclusion of more targeted Assessment Criteria that refine the scope of assessment to the range of effects that the infringement generates (either actual or potential).Opposes the inclusion of Plan Objectives and Policies.
Tawanui Developments Limited	Planning Maps /General /General	247.39	Oppose	Seeks the inclusion of a Riverbend Road Development Area to manage the development of the Riverbend Road land holdings. Notes that a bespoke suite of Issues, Objectives and Policies along with provisions has been developed. Supports in part the matters contained within the Introductory section. Considers the scope of the provisions in the DEV Area sought are sufficient to guide development on the sites and will also enable the currently identified constraints and the mitigatory measures already tested and proposed to be embedded as part of the development. (Refer to original submission for full details and attachment).	Include a new DEV4 - Riverbend Road Development Area.
Tawanui Developments Limited	Planning Maps /General /General	247.40	Amend	Considers that an amendment to the underlying zone of Rural Production should be changed to Medium Density Residential, Local Centre Zone and Rural Production Zone to enable a new Development Area be added to the Riverbend Road Development Area, as per the map in Appendix 2 of the submission (between Riverbend Road and Waterworth Ave)	Amend the planning maps to rezone this area and to include an additional development area.
Tawanui Developments Limited	General /General /General	247.41	Amend	Considers an amendment to include an additional Development Area to include the Riverbend Road Development Area, as per attachment 3 of the submission,	Amend the plan to include the Riverbend Road Development Area.