

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Mana Ahuriri Holdings Limited Partnership	Definitions /Definitions /General	263.1	Amend	Insert a new definition for habitable room to clarify and aid in useability of the MRZ, MUZ and HRZ and to align with the relief sought in respect of Rule MRZ-S12, MHALP. The definition set out in Part 14 of the National Planning Standards is sought to be included within The Plan.	Seeks the definition set out in Part 14 to be included within The Plan.
Mana Ahuriri Holdings Limited Partnership	Definitions /Definitions /General	263.2	Amend	Amend definition of 'Retail Activity' as it is too broad and enables a significant range of activities to establish. Refinement will provide more certainty and enable tailored management within the zone. A definition that enables trade supply activities as a clearly defined activity within the LFRZ and GIZ and LIZ is sought to enable operations to span across trade supplies and customer supplies.	Include a definition of trade supply which captures sales also to the general public of:a) Automotive or marine supplies; b) Building supplies; c) Catering equipment; d) Farming and agricultural supplies; e) Garden and outdoor equipment; f) Industrial supplies; g) Landscape supplies; h) Outdoor recreation equipment; i) Pet supplies; and j) Maintenance and cleaning supplies.
Mana Ahuriri Holdings Limited Partnership	TPT - Transport /TPT - Transport - Standards Table	263.3	Oppose	Opposes the blanket restriction of 400 vehicles per day for any activity in TPT-S7 as this is unduly restrictive, particularly in respect of large-scale retail (LFR) activities. The Plan directs the scale of the buildings associated with such activities to be over 1000sqm however then places restrictions through other District wide chapters which do not align with the nature of the activity that is Permitted by the Plan.	Amend the rates to reflect the generation effects of such activities or introduce a scale of traffic or delete this standard.
Mana Ahuriri Holdings Limited Partnership	SUB - Subdivision /Issues /General	263.4	Amend	Generally supports the proposed Introduction and the Issues framework (contained within SUB-I1 – SUB-I8) subject to some amendments and refinements to aid in useability, clarity, and consistency of terminology. The Submitter seeks some 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.
Mana Ahuriri Holdings Limited Partnership	SUB - Subdivision /Objectives /General	263.5	Oppose	Opposes objectives and policies. 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.	Seeks amendments 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.
Mana Ahuriri Holdings Limited Partnership	SUB - Subdivision /Policies /General	263.6	Oppose	Opposes Subdivision objectives and policies. 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.	Seeks amendments 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.
Mana Ahuriri Holdings Limited Partnership	SUB - Subdivision /SUB - Subdivision - Rules Table	263.7	Oppose	Amendments to SUB-R2B and SUB—R4B are sought as there is no substantive rationale for the inclusion of a discretionary activity consenting category against an activity which fails to meet all the relevant standards. An amended consent category still provides Council with the ability to consider relevant matters and decline if it sees fit to do so but focuses on salient matters rather than a wide-ranging assessment. It is appropriate for a proposal to fall from Controlled to Restricted Discretionary but the default to Discretionary is not considered justified in many instances.	Amend the consent activity categories to reflect a more logical cascade of consenting status depending upon the nature of the subdivision and the standards that may not be achieved.
Mana Ahuriri Holdings Limited Partnership	SUB - Subdivision /SUB - Subdivision - Rules Table	263.8	Oppose	Amendments to SUB-R2B and SUB—R4B are sought as there is no substantive rationale for the inclusion of a discretionary activity consenting category against an activity which fails to meet all the relevant standards. The amended consent category still provides Council with the ability to consider relevant matters and decline if it sees fit to do so but focuses on salient matters rather than a wide-ranging assessment. It is appropriate for a proposal to fall from Controlled to Restricted Discretionary but the default to Discretionary is not considered justified in many instances.	Amend the consent activity categories to reflect a more logical cascade of consenting status depending upon the nature of the subdivision and the standards that may not be achieved.
Mana Ahuriri Holdings Limited Partnership	SUB - Subdivision /SUB - Subdivision - Rules Table	263.9	Oppose	Oppose SUB-R1A, SUB-R2A and SUB-R5 as that standard seeks to reserve control over the Purpose, Objectives and Policies of the relevant Zone, Precinct and Development Area. If an activity is Controlled by the zone or other standards, it must inherently be considered to be envisaged by the Objectives and Policies and as such the need for control over that matter is considered redundant.	Remove reference to (1) in SUB-R1A, SUB-R2A and SUB-R5.
Mana Ahuriri Holdings Limited Partnership	SUB - Subdivision /SUB - Subdivision - Rules Table	263.1	Oppose	Opposes SUB-R1A, SUB-R2A and SUB-R5 as that standard seeks to reserve control over the Purpose, Objectives and Policies of the relevant Zone, Precinct and Development Area. If an activity is Controlled by the zone or other standards, it must inherently be considered to be envisaged by the Objectives and Policies and as such the need for control over that matter is considered redundant.	Remove reference to (1) in SUB-R1A, SUB-R2A and SUB-R5.
Mana Ahuriri Holdings Limited Partnership	SUB - Subdivision /SUB - Subdivision - Rules Table	263.11	Oppose	Opposes SUB-R1A, SUB-R2A and SUB-R5 as that standard seeks to reserve control over the Purpose, Objectives and Policies of the relevant Zone, Precinct and Development Area. If an activity is Controlled by the zone or other standards, it must inherently be considered to be envisaged by the Objectives and Policies and as such the need for control over that matter is considered redundant.	Remove reference to (1) in SUB-R1A, SUB-R2A and SUB-R5.

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Mana Ahuriri Holdings Limited Partnership	SUB - Subdivision /SUB - Subdivision - Standards Table	263.12	Oppose	Opposes the non-complying category of SUB-S1. The matters at issue are considered to be able to be managed through a Restricted Discretionary activity status.SUB-S1 is opposed. The vacant lot subdivision standard set out in SUB-S1 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 give effect to the relief sought. Amend SUB-S1 to reflect a vacant site net site area of 250sqm for the MRZ.
Mana Ahuriri Holdings Limited Partnership	SUB - Subdivision /SUB - Subdivision - Standards Table	263.13	Oppose	Amend SUB-S2 as there is no resource management rationale for having no control over subdivision (by way of a minimum lot area) within Commercial and Industrial Zones but conversely imposing a minimum of 2500sqm for subdivision undertaken within the LFRZ. In all these zones, the nature of the intended land use will dictate the size of the lot required and the land use standards for the LFRZ are already well regulated through the zoning provisions.	Delete the 2500sqm provision in respect of LFRZ subdivision in SUB-R2.
Mana Ahuriri Holdings Limited Partnership	SUB - Subdivision /SUB - Subdivision - Standards Table	263.14	Amend	Recognition of the Wharerangi Development Area within Rule SUB-S5 is sought, as that area is not clearly identified and it is noted that SUB-S5 currently enables the Mission Development Area and Te Awa Development Area amongst others to benefit from a "no minimum" lot area approach to subdivision. The Submitter seeks an amendment to reflect the same standards be applicable to the Wharerangi Development Area identified in APP-10.	Add reference to the DEV-2 (Wharerangi Development Area) into the standards in SUB-S5.
Mana Ahuriri Holdings Limited Partnership	SUB - Subdivision /SUB - Subdivision - Standards Table	263.15	Oppose	Removal of SUB-S6 is sought, 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. There is no link or caveat in respect of multi-unit development subdivision or other activities which might justify the existence of the rule. In the absence of a clear rationale as to why this rule is necessary and what effect or resource management issue it purports to regulate; The Submitter seeks the deletion of these rules. If a subdivision proposal complies with all relevant standards, it is unclear as to why this rule overrides the other activity standards.	Delete SUB-S6.
Mana Ahuriri Holdings Limited Partnership	SUB - Subdivision /SUB - Subdivision - Standards Table	263.16	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. The imposition of a blanket shape factor renders the outcome inflexible and not reflective of higher density development.	Delete SUB-S11.
Mana Ahuriri Holdings Limited Partnership	SUB - Subdivision /Assessment criteria /SUB-AC1: General, applies to all subdivision (including boundary adjustments)	263.17	Oppose	Opposes SUB-AC1 as (a) reserves control over the Purpose, Objectives and Policies of the relevant Zone, Precinct and Development Area. If an activity is Controlled or Restricted Discretionary by the zone or other standards, it must inherently be considered to be envisaged by the Objectives and Policies and as such the need for the inclusion of this provision is considered redundant. There is additional terminology used in the balance of the provisions which does not correlate with resource management terminology and does not provide clarity and conciseness for users of the Plan.	Amend SUB-AC1 to remove (a) and reconfigure the balance of the provisions.
Mana Ahuriri Holdings Limited Partnership	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)	263.18	Oppose	Seeks the deletion of SUB-AC2. This is effectively addressing the same issues as that for all other subdivisions. It is considered unnecessary and not a provision that adds to the robustness or quality of an assessment of subdivision.	Delete SUB-AC2.
Mana Ahuriri Holdings Limited Partnership	SUB - Subdivision /Assessment criteria /SUB-AC8: All infringements to standards (SUB-S1 - SUB-S18)	263.19	Oppose	SUB-AC8 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.
Mana Ahuriri Holdings Limited Partnership	MRZ - Medium Density Residential Zone /Objectives /General	263.2	Amend	Amend MRZ-O1 to MRZ-O5 to improve useability and clarity.	Redraft to focus on salient matters.
Mana Ahuriri Holdings Limited Partnership	MRZ - Medium Density Residential Zone /Policies /MRZ-P4: Quality living environments - within the site	263.21	Amend	Amend 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-O1 and MRZ-O2. Clarify the fact in MRZ-P4 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 MRZ-P4 to enable a greater degree of flexibility in the provision of open space areas. Amend to reflect the requirements of the NPS-UD 2020 more clearly.
Mana Ahuriri Holdings Limited Partnership	MRZ - Medium Density Residential Zone /Policies /MRZ-P7: Sustainable design and infrastructure	263.22	Amend	Amendments to MRZ-P7 are sought that better reflect the definition of effects as set out in s.3 of The Act.	Amend MRZ-P7 to relate to the definition in s.3 of The Act.
Mana Ahuriri Holdings Limited Partnership	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Rules Table	263.23	Oppose	Amend 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.
Mana Ahuriri Holdings Limited Partnership	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table	263.24	Amend	Amend 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.

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Mana Ahuriri Holdings Limited Partnership	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table	263.25	Oppose	<p>1. Amend Rule MRZ-S11, 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.</p> <p>2. MRZS-11(3) is also unclear in intent and structure. The inclusion of enhanced graphics or an explanatory statement would assist in usability and understanding. Changes are sought to MRZ-S12 with seeming 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. Amendments are also sought 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.</p>	<p>1. Seeks to Amend to clarify ground floor standards and delete MRZ-S11(3 and 4).</p> <p>2. Seeks to Amend the rule to achieve better alignment with yards and outdoor space requirements.</p>
Mana Ahuriri Holdings Limited Partnership	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table	263.26	Amend	Amend the minimum floor areas for units in Rule MRZ-S13, as with good design it is possible to provide an appropriate living environment that varies from the standards set out.	<p>Amend MRZ-S13 to include:</p> <p>a) Studio: 35sqm b) 1 bed: 45 sqm c) 2-bed: 60sqm d) 3-bed: 80sqm</p>
Mana Ahuriri Holdings Limited Partnership	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table	263.27	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.
Mana Ahuriri Holdings Limited Partnership	MRZ - Medium Density Residential Zone /Assessment criteria /General	263.28	Amend	Generally support 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.
Mana Ahuriri Holdings Limited Partnership	MRZ - Medium Density Residential Zone /Assessment criteria /MRZ-AC1: Residential units (MRZ-R1); Relocated buildings (MRZ-R5); Retirement village premises (MRZ-R6)	263.29	Amend	Seeks 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.
Mana Ahuriri Holdings Limited Partnership	Planning Maps /General /General	263.3	Amend	The Submitter has a specific interest in a number of larger sites on Napier Hill which fall under the aforementioned GRZ Zone and PREC-3 provisions. These highly modified sites have historically been used for healthcare services with larger buildings constructed by the Government, including the former multi storey nurses' hostel which has only recently been demolished. This site in particular represents a significant opportunity, on a vacant site, for a comprehensive residential development however that is not enabled by the provisions of the GRZ, or the provisions associated with the PREC3 - Napier Hill / Mataruahou Amenity Precinct. given their size and location they can offer an opportunity for an efficient use of larger sites for higher density residential development, visitor accommodation, residential care, and retirement uses.	<p>Rezone the following sites to enable higher density development:</p> <p>a) 20A/B Hospital Terrace, b) 186 Battery Road, c) 79 Napier terrace, d) 102 Chaucer Road, e) 2 sixty fifth St and f) 2 Parade Street.</p>
Mana Ahuriri Holdings Limited Partnership	PREC3 - Napier Hill Mataruahou Amenity Precinct /General /General	263.31	Oppose	The Submitter has a specific interest in a number of larger sites on Napier Hill which fall under the aforementioned GRZ Zone and PREC-3 provisions. These highly modified sites have historically been used for healthcare services with larger buildings constructed by the Government, including the former multi storey nurses' hostel which has only recently been demolished. This site in particular represents a significant opportunity, on a vacant site, for a comprehensive residential development however that is not enabled by the provisions of the GRZ, or the provisions associated with the PREC3 - Napier Hill / Mataruahou Amenity Precinct. Given their size and location they can offer an opportunity for an efficient use of larger sites for higher density residential development, visitor accommodation, residential care, and retirement uses.	<p>Include narrative which recognises and provides for higher density development on specified sites within PREC 3, specifically:</p> <p>a) 20A/B Hospital Terrace, b) 186 Battery Road, c) 79 Napier terrace, d) 102 Chaucer Road, e) 2 sixty fifth St and f) 2 Parade Street.</p>
Mana Ahuriri Holdings Limited Partnership	GRZ - General Residential Zone /General /General	263.32	Oppose	The Submitter has a specific interest in a number of larger sites on Napier Hill which fall under the aforementioned GRZ Zone and PREC-3 provisions. These highly modified sites have historically been used for healthcare services with larger buildings constructed by the Government, including the former multi storey nurses' hostel which has only recently been demolished. This site in particular represents a significant opportunity, on a vacant site, for a comprehensive residential development however that is not enabled by the provisions of the GRZ, or the provisions associated with the PREC3 - Napier Hill / Mataruahou Amenity Precinct. given their size and location they can offer an opportunity for an efficient use of larger sites for higher density residential development, visitor accommodation, residential care, and retirement uses.	<p>Include narrative which recognises and provides for higher density development on specified sites within PREC 3, specifically:</p> <p>a) 20A/B Hospital Terrace, b) 186 Battery Road, c) 79 Napier terrace, d) 102 Chaucer Road, e) 2 sixty fifth St and f) 2 Parade Street.</p>
Mana Ahuriri Holdings Limited Partnership	PREC3 - Napier Hill Mataruahou Amenity Precinct /Issues /General	263.33	Oppose	Amendment is sought to the Issues as they place the maintenance of character over and above the direction set by the NPS-UD 2020 and over which special character is not necessarily an overriding matter in all instances. The provisions need to be balanced to give effect to the direction of the NPS.	Amend the provisions to reflect the NPS-UD 2020 and the recognition of the larger sites that can accommodate a variety of higher density activities and additionally reference the underlying zonings sought in this submission.
Mana Ahuriri Holdings Limited Partnership	PREC3 - Napier Hill Mataruahou Amenity Precinct /Objectives /PREC3-O2: Retention of amenity character values	263.34	Oppose	Opposes the terminology in PREC-O2 as it requires the retention of character values which has the effect of seeking to lock the existing character of the area up. That is not mandated by Policy 6 of the NPS-UD 2020 which signals changing amenity is to be expected as communities evolve and grow. This is also reflected in PREC3-P2.	Amend PREC-O3 to reflect the importance of "managing" special character rather than retention and any associated amendments to PREC3-P2.

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Mana Ahuriri Holdings Limited Partnership	PREC3 - Napier Hill Mataruahou Amenity Precinct /Policies /PREC3-P2: Character and amenity values	263.35	Oppose	Opposes the terminology in PREC-O2 as it requires the retention of character values which has the effect of seeking to lock the existing character of the area up. That is not mandated by Policy 6 of the NPS-UD 2020 which signals changing amenity is to be expected as communities evolve and grow. This is also reflected in PREC3-P2.	Amend PREC-O3 to reflect the importance of “managing” special character rather than retention and any associated amendments to PREC3-P2.
Mana Ahuriri Holdings Limited Partnership	PREC3 - Napier Hill Mataruahou Amenity Precinct /Objectives /General	263.36	Oppose	Seeks the addition of a new Objective as PREC-O3 which recognises and provides for the consideration of larger scale comprehensively designed residential, visitor accommodation or residential care/retirement villages on the identified sites and limits larger scale development to those identified sites.	Add a new Objective to give effect to the relief sought in the submission which recognises the range of activities sought.
Mana Ahuriri Holdings Limited Partnership	PREC3 - Napier Hill Mataruahou Amenity Precinct /PREC3 - Napier Hill/Mataruahou Precinct - Rules Table /General	263.37	Oppose	Seeks an addition to PREC 3-R1 to PREC-R4 to reflect the nature of the site-specific land use activities sought provisions sought and amend the rules for the GRZ/PREC3 Precinct accordingly. The Submitter considers that the activities can be addressed as Restricted Discretionary Activities subject to matters of discretion that can be tailored to reflect their context and setting and in doing so enable a thorough assessment of relevant matters while recognising that such development is envisaged for these sites.	Add new rules which provide for larger-scale activities as sought, allied to a suite of matters for assessment over which Council will utilise as Assessment Criteria.
Mana Ahuriri Holdings Limited Partnership	PREC3 - Napier Hill Mataruahou Amenity Precinct /PREC3 - Napier Hill/Mataruahou Precinct - Standards Table /General	263.38	Oppose	Seeks an additional Standard which regulates the standards to be applied to the identified higher density sites and clarifies which of the underlying zone standards (as they relate to the amended zonings sought) will be amended by the standards in PREC3. This enables a balanced approach of enabling higher density development but with additional or amended tailored standards to manage the outcomes sought and the key effects to be addressed.	Add a new standard into PREC3 clarifying the underlying zoning standards which apply.
Mana Ahuriri Holdings Limited Partnership	PREC3 - Napier Hill Mataruahou Amenity Precinct /Assessment criteria /General	263.39	Oppose	Amend assessment criteria in order to aid in usability and ease of use.	Redraft provisions to aid in clarity and focus on salient matters clearly.
Mana Ahuriri Holdings Limited Partnership	LCZ - Local Centre Zone /Objectives /General	263.4	Amend	Minor amendments are sought to aid in clarity and certainty. The language used is at times vague and creates uncertainty for users of the Plan.	Redraft provisions to aid in clarity and focus on salient matters clearly.
Mana Ahuriri Holdings Limited Partnership	LCZ - Local Centre Zone /Policies /General	263.41	Amend	Minor amendments are sought to aid in clarity and certainty. The language used is at times vague and creates uncertainty for users of the Plan.	Redraft provisions to aid in clarity and focus on salient matters clearly.
Mana Ahuriri Holdings Limited Partnership	LCZ - Local Centre Zone /LCZ - Local Centre Zone - Rules Table	263.42	Oppose	Oppose LCZ-R1 as it is considered unduly restrictive for the LCZ. On the basis that a proposed building can achieve the relevant standards set out for the Zone and presumably the standards deal with the key environmental effects to be managed, there is no compelling reason why an activity status of Restricted Discretionary is required.	Amend LCZ-R1 to a Permitted Activity status if all the relevant standards can be achieved.
Mana Ahuriri Holdings Limited Partnership	LCZ - Local Centre Zone /LCZ - Local Centre Zone - Rules Table	263.43	Oppose	Opposes rule LCZ-R2. This is deemed unduly restrictive given the very low threshold trigger of 25sqm. The matters for discretion are not aligned with the effects arising from, for example, an addition of 25sqm triggering a consent requirement as a restricted Discretionary Activity.	Delete or amend this rule to make such activities permitted.
Mana Ahuriri Holdings Limited Partnership	LCZ - Local Centre Zone /LCZ - Local Centre Zone - Rules Table	263.44	Oppose	Opposes LRZ-R10A as car parking is an essential component for the majority of local centres and given the scale of these centres and the quantum of income they generate, is almost always on grade parking. A Restricted Discretionary consent for an at grade car park is considered to be out of proportion with the nature and scale of the activity. The alternative is to place some caveats as to scale and size whereby a consent is triggered but as proposed the rule is overly harsh. It is noted that the carparking activity status of Discretionary is even more restrictive than for a new building to house a commercial activity. This rule effectively “neutralises” any of the Permitted Activities on a site by placing consenting requirements on the supporting infrastructure to allow a Permitted Activity to function effectively.	Delete or amend this rule to make such activities Permitted.
Mana Ahuriri Holdings Limited Partnership	LCZ - Local Centre Zone /LCZ - Local Centre Zone - Rules Table /General	263.45	Oppose	LCZ Rules table should also include specific provision for infrastructure including EV charging facilities and any associated structures as a permitted Activity.	Include provision for, EV charging stations and ancillary infrastructure.
Mana Ahuriri Holdings Limited Partnership	LCZ - Local Centre Zone /Assessment criteria /General	263.46	Amend	Amendments are sought 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.	The Submitter 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) rather than a wider sweep of the Plan Objectives and Policies.
Mana Ahuriri Holdings Limited Partnership	LFRZ - Large Format Retail Zone /LFRZ - Large Format Retail Zone - Rules Table	263.47	Oppose	Amend Rule LFR-R1 and 2 as this provision is considered to be too blunt in its current form and on larger sites limits development opportunities for LFR sites. While the range of tenancies can be broadened under Rule LFRZ-R1A (2), it is noted that the corresponding “broadening up” of the mix of tenancy sizes is not replicated in LFRZ-R2A.	Amend LFRZ-R1A to enable a greater range of smaller tenancies as part of an LFR development. Set the minimum GFA at 800sqm. Amend LFRZ-R1A (2) to 40%
Mana Ahuriri Holdings Limited Partnership	LFRZ - Large Format Retail Zone /LFRZ - Large Format Retail Zone - Rules Table	263.48	Oppose	Amend Rule LFR-R1 and 2 as this provision is considered to be too blunt in its current form and on larger sites limits development opportunities for LFR sites. While the range of tenancies can be broadened under Rule LFRZ-R1A (2), it is noted that the corresponding “broadening up” of the mix of tenancy sizes is not replicated in LFRZ-R2A. A corresponding amendment to allow for situations where larger sites are enabled to accommodate a larger range of hospitality facilities to cater for the typical demands and market sectors arising from a an LFR retail complex. That is not considered to have a significant potential for an adverse impact on the CBD core given the type, nature, and operating model of the typical; hospitality establishments in such LFR developments are not usually wanting to establish within a CBD type environment. Changes to the scale and number of such developments are sought including recognition of drive-thru establishments as being a suitable activity within the LFRZ.	Amend LFRZ-R1A to enable a greater range of smaller tenancies as part of an LFR development. Set the minimum GFA at 800sqm. Amend LFRZ-R1A (2) to 40% Amend the 150sqm restriction to reflect market demands and provide a max 300sqm floor area for these activities. Recognise and provide for drive-through restaurants as these have different requirements to other hospitality operations.
Mana Ahuriri Holdings Limited Partnership	LFRZ - Large Format Retail Zone /LFRZ - Large Format Retail Zone - Rules Table	263.49	Oppose	Oppose LFRZ-R3A as it is considered overly restrictive and onerous. A departure from landscape standards and the particular palette of planting required is not a matter that should be considered as a discretionary activity if not adhered to.	Delete or amend this rule to give effect to the relief sought.

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Mana Ahuriri Holdings Limited Partnership	LFRZ - Large Format Retail Zone /LFRZ - Large Format Retail Zone - Rules Table NA	263.5	Oppose	Oppose Rule LFRZ-R5 as it imposes a blanket coverage rule. The proposed rule is blunt and does not reflect the fact that the site development will be required to manage stormwater by way of quantifiable modelling and engineering design to avoid, remedy, or mitigate adverse environmental effects. The net result is to restrict development in an efficient manner on a scarce land resource in Napier.	Delete the coverage requirements.
Mana Ahuriri Holdings Limited Partnership	LFRZ - Large Format Retail Zone /LFRZ - Large Format Retail Zone - Rules Table /General	263.51	Oppose	Seeks amendment to the LFRZ rules table to include express recognition of ancillary offices or similar supporting activities within the Rules to ensure clarity, and to recognise the fundamental role of ancillary facilities and also complementary aspect of LFR activities but are not currently captured within the definition of retail activity per say.	Include provision and recognition for offices ancillary to a retail operation.
Mana Ahuriri Holdings Limited Partnership	LFRZ - Large Format Retail Zone /LFRZ - Large Format Retail Zone - Rules Table /General	263.52	Oppose	The provision of supporting and complementary activities including service stations / EV car recharge stations are also expected within an LFRZ and are an expected aspect of the land use range in the context of an automobile driven form of retailing. These are currently not provided for within the LFRZ noting that a definition of service station is already contained within the Plan.	Include provision for service stations, EV charging stations and ancillary infrastructure.
Mana Ahuriri Holdings Limited Partnership	LFRZ - Large Format Retail Zone /LFRZ- Large Format Retail Zone - Standards Table	263.53	Oppose	Opposes a blanket standard in LFR-S4 and LFR-S5 as it is blunt and does not reflect the fact that the site development will be required to manage stormwater by way of quantifiable modelling and engineering design to avoid, remedy, or mitigate adverse environmental effects. The net result is to restrict development in an efficient manner on a scarce land resource in Napier.	Delete the rule.
Mana Ahuriri Holdings Limited Partnership	LFRZ - Large Format Retail Zone /LFRZ- Large Format Retail Zone - Standards Table	263.54	Oppose	Opposes the blanket standard in LFR-S4 and LFR-S5 as it is blunt and does not reflect the fact that the site development will be required to manage stormwater by way of quantifiable modelling and engineering design to avoid, remedy, or mitigate adverse environmental effects. The net result is to restrict development in an efficient manner on a scarce land resource in Napier.	Delete the rule.
Mana Ahuriri Holdings Limited Partnership	LFRZ - Large Format Retail Zone /Assessment criteria /General	263.55	Amend	Amend assessment criteria 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) rather than a wider sweep of the Plan Objectives and Policies.
Mana Ahuriri Holdings Limited Partnership	MUZ - Mixed Use Zone /Introduction /	263.56	Amend	While generally supported, there is a significant volume of text and explanation which does not assist in terms of understanding the intent of the Zone and the key matters that set the scene for the provisions. The result is an introduction which is unwieldy and does not aid in useability or clarity. While the Retail Strategy notes a 200sqm for commercial activities within the zone, that does not appear to be buttressed by market demand and tenancy requirements. The Submitter seeks an increase to 300sqm in this area. That is considered appropriate for redevelopment potential of larger existing MUZ sites.	Re-draft the provisions to focus on salient matters and amend 200sqm to 300sqm.
Mana Ahuriri Holdings Limited Partnership	MUZ - Mixed Use Zone /Issues /General	263.57	Amend	While generally supported, there is a significant volume of text and explanation which does not assist in terms of understanding the intent of the Zone and the key matters that set the scene for the provisions. The result is an introduction which is unwieldy and does not aid in useability or clarity. While the Retail Strategy notes a 200sqm for commercial activities within the zone, that does not appear to be buttressed by market demand and tenancy requirements. The Submitter seeks an increase to 300sqm in this area. That is considered appropriate for redevelopment potential of larger existing MUZ sites.	Re-draft the provisions to focus on salient matters and amend 200sqm to 300sqm.
Mana Ahuriri Holdings Limited Partnership	MUZ - Mixed Use Zone /Objectives /General	263.58	Amend	While generally supported, there is a significant volume of text and explanation which does not assist in terms of understanding the issues for the Zone and the key matters that set the scene for the provisions. The result is an introduction which is unwieldy and does not aid in useability or clarity.	Re-draft the provisions to focus on salient matters.
Mana Ahuriri Holdings Limited Partnership	MUZ - Mixed Use Zone /MUZ - Mixed Use Zone - Rules Table	263.59	Oppose	Amend or delete Rule MUZ-R1A as there appears to be no substantive rationale to the inclusion of an alternate standard of 400sqm for a building on a site vs a minimum of 500 for a retail activity on the site. The building coverage and landscape standards, together with the provision of carparking will regulate the built form on the site.	Delete this rule.
Mana Ahuriri Holdings Limited Partnership	MUZ - Mixed Use Zone /MUZ - Mixed Use Zone - Rules Table	263.6	Oppose	Opposes the 150sqm blanket floor area restriction and the limiting of the number of hospitality outlets in Rule MUZ-R4A (2) is considered to be unduly restrictive. It does not correlate to sites of larger scale of the site, the nature of the balance of development on the site and while seeking to manage the vibrancy of the CBD, it has the effect of restricting choice and economic wellbeing opportunities for the community.	Amend the rule to reflect that larger sites can accommodate a greater range of hospitality activities and amend the 150sqm restriction to 250sqm.
Mana Ahuriri Holdings Limited Partnership	MUZ - Mixed Use Zone /MUZ - Mixed Use Zone - Rules Table	263.61	Oppose	Amend Rule MUZ-R9 as it significantly limits and places restrictions on visitor accommodation as a Permitted Activity and also defaults any infringing activities to a Discretionary Activity status. This is considered unduly restrictive given the locations of the MUZ and their role in supporting the vibrancy of the CBD by enabling accommodation facilities to establish in bespoke designed buildings within the MUZ. Tourism and accommodation is a key driver of the regional economy, and it is considered that the proposed restrictions are not enabling of these activities in their current form.	Amend the provision to provide for larger scale visitor accommodation as a Restricted Discretionary Activity.
Mana Ahuriri Holdings Limited Partnership	MUZ - Mixed Use Zone /MUZ - Mixed Use Zone - Standards Table	263.62	Amend	Amend Rule MUZ-S8 as there appear to be editing errors in the standards relating to ground floor outdoor living space requirements. The standards in MUZ-S8 include requirements for roof terraces, balconies but which are captured by the ground floor residential unit requirements. MUZ-S8(3) and (4) is unduly restrictive in respect of setbacks for southern facing yards and will restrict the efficient development of sites within the MUZ.	Amend provision to reflect ground floor standards only. Delete the provisions of MUZ-S8 (3 and 4).

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Mana Ahuriri Holdings Limited Partnership	MUZ - Mixed Use Zone /MUZ - Mixed Use Zone - Standards Table	263.63	Amend	Amend Rule MUZ-S10 in relation to minimum floor areas for units, as with good design it is possible to provide an appropriate living environment that varies from the standards set out.	Amend the minimum floor area standards to: Studio: 35sqm 2- bed: 45 sqm 3- bed: 60 sqm 4- bed: 80 sqm
Mana Ahuriri Holdings Limited Partnership	MUZ - Mixed Use Zone /Assessment criteria /General	263.64	Amend	Amend Assessment Criteria to refine and tighten the consideration of activities 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 part of a Restricted Discretionary Activity.	Amend Assessment Criteria and remove the requirement for a restricted discretionary activity to be assessed against the relevant Objectives and Policies of the Plan.
Mana Ahuriri Holdings Limited Partnership	GIZ - General Industrial Zone /GIZ - General Industrial Zone - Rules	263.65	Oppose	Amend GIZ-R3A to enable a larger allowance for showrooms and retail display as the restrictions are unduly restrictive in the context of the types of activities that the GIZ enables. Business benefit from economies of scale and the nature of such activities means that they will not wish or be able to establish easily within other commercial zones.	Amend the rule to remove the 200sqm restriction.
Mana Ahuriri Holdings Limited Partnership	GIZ - General Industrial Zone /GIZ - General Industrial Zone - Standards Table	263.66	Oppose	Opposes GIZ-S6 as the preference is to rely upon stormwater design and techniques which can be demonstrably shown to achieve the coefficient ratings for the zone.	Remove the impervious surface requirement.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Introduction /	263.67	Amend	The Submitter supports in part the matters contained within the Introductory section. However, it is noted that the introduction references Map APP10 and states that this map denotes indicative open space, key connector roads, cycleways, and walkways. From the digital on-line version of APP10, the Submitter is not able to discern the majority of the mapping features set out in the Introductory section. This may be a graphic presentation error or an inadvertent omission.	Delete references to these features and the denoting on APP-10.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Issues /DEV-12: Recreation and connectivity	263.68	Oppose	DEV2-12 and DEV-13. DEV-12 seeks to provide a centralised reserve with connectivity to the Taipo Stream and beyond. This is set out as a "requirement" but yet the Map in APP10 does not denote such a requirement. The Submitter considers that by creating connections to both the Taipo Stream and Saltwater Creek, as well as to Park Island to the immediate north, that there is no absolute starting premise to require the inclusion of a passive reserve area within the Development Area itself and that the need for a reserve should reasonably be assessed at the time that a consent application is lodged and is being considered by Council.	Amendments to DEV-12 to focus on permeability and connections to existing open space areas and remove references to a centralised reserve for residents.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Issues /DEV2-13: Rural context	263.69	Oppose	DEV-13 cites a potential effect but fails to recognise that the site is within a single ownership and that such matters can be managed as development progresses. The site is zoned for residential purposes and as such there is an expectation of a level of effect from a change from a rural land use to urban activities. It is further noted that DEV-13 states that urban development may detract from the visual amenity of the surrounding rural environment. The Submitter notes that there is no surrounding rural environment. It is unclear as to what this provision seeks to achieve, and it is considered superfluous to managing the key environmental effects of development on a site zoned for residential and commercial use.	Delete DEV-13
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Objectives /General	263.7	Amend	The Submitter supports in part the Objectives contained within DEV-O1 to DEV-O6 however seek some minor amendments to reflect the need to provide housing choice and a diversity of typologies within the DEV2 Area.	Include amendments to make clear reference to housing choice and variety being a key Objective for the DEV-2 Area.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Policies /DEV2-P2: DensityRequire residential development to contribute to Napier's housing supply and the efficient provision of infrastructure by providing a minimum density of 24 residential units per hectare. Relates to DEV2-O2	263.71	Amend	The Submitter seeks an amendment to Policy DEV2-P2 to clarify the expected yield is a net density calculation (net of roads and reserves). Additional refinements to terminology employed in DEV2-P1 to DEV2-P5 is also sought to assist in clarity and useability of the Plan.	Amend DEV2-P2 to reflect a net density calculation and amendments to refine the balance of the policies in DEV2.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /DEV2 - Wharerangi Road Development Area - Rules Table /General	263.72	Oppose	The Submitter notes that the underlying zonings are MRZ and LCZ. These are the subject of matters contained within this submission. The Submitter supports the approach taken with the underlying zoning on the basis that the relief sought in respect of those zonings is adopted.	Ensure alignment of the underlying zoning and the amendments to those rules sought.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /DEV2 - Wharerangi Road Development Area - Standards Table	263.73	Oppose	<p>Oppose DEV2-S1 as the provision appears to render subdivision a restricted discretionary activity and any subdivision which does not comply with the standards as being discretionary. This is not aligned with the provisions of the District wide standards which render a complying subdivision as a Controlled Activity. Given that there are additional matters to be considered in DEV-2 and that this has been subject to considerable planning and assessment, the intent of the standard and the consent status afforded by the rule is unduly onerous.</p> <p>An addition to the proposed standards is sought by adding an additional Standard that provides for development within the identified Local Centre, enabling a single larger tenancy within this Local Centre site (which forms part of the area under the management of DEV2). Market assessment and economic analysis has confirmed that a single large tenancy, supported by smaller local retail stores can be established as part of the site and at a scale which will not adversely impact upon the surrounding retail centres, but conversely provide a benefit to future residents and the existing residential catchment.</p>	Amend DEV2-S2 (in respect of subdivision) to be a Controlled Activity with a Restricted Discretionary status if standards are not achieved. Add a new rule to enable a single retail tenancy within the LCZ in DEV2 to be no larger than 2500sqm and limited to one such tenancy within this DEV Area.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Assessment criteria /DEV2-AC1: All subdivision and development	263.74	Amend	The Submitter seeks amendments to DEV2-AC1 (a) to render any subdivision to be in general accordance with the Wharerangi Road Development Plan APP-10, noting that the plan in question does not contain any additional information or detail which assists the user.	Amend DEV2-AC1(a) to include "general accordance" rather than "consistent". Minor tidying of terminology and clarity in the balance of criteria is sought to refine the provisions.
Mana Ahuriri Holdings Limited Partnership	SCHED6 - Amenity Precinct Values and Attributes Statements /PREC3 - Napier Hill/Mataruahou Amenity Precinct /	263.75	Oppose	Amend the amenity statement for PREC3 as it makes no reference to the currently vacant (and recently demolished) buildings in the Precinct, and the larger sites which have a different quality and character to the majority of the Precinct. It is considered necessary to include references to these in the Amenity Statement as that is considered one of the key elements of the Precinct and is not currently reflected in the Statement.	Add additional text and cite the former uses of specified sites and their character in the context of the balance of the Precinct.
Mana Ahuriri Holdings Limited Partnership	APP15 - Financial Contributions Tables /APP15 - Financial Contributions Tables /General	263.76	Oppose	<p>Amend App-15 to correct inaccuracies. Appendix 31A of The Operative Plan denotes the breakdown of "Non-Local Offsite" Financial Contributions (noting poor formatting in The Plan) and which has the Te Awa Structure Plan area being liable for a Local Off-site contribution of \$392,630 per ha, and a charge of \$ 2,548 per metre of road frontage.</p> <p>Conversely, Table 3 in APP-15 denotes Park Island (which the proposed Wharerangi Development Area was a part of in the Operative Plan) as being liable for a charge of \$392,630 per hectare and Te Awa only being denoted as paying a charge of \$2,548 per metre (road frontage).</p> <p>It is presumed that this is simply a typographic/editing error noting that the current Operative Plan provisions continue to prevail and advice from NCC officers is that this is indeed the case. The Submitter seeks clarity over this matter and any consequential changes required.</p>	Amend APP-15 to reflect the Operative District Plan appendices and the status quo until such time as the Development Contributions Policy is reviewed. The Financial Contributions Policy review has not been completed and therefore the chapter should be an exact replica of that in the Operative District Plan.
Mana Ahuriri Holdings Limited Partnership	APP16 - Financial Contributions Areas /APP16 - Financial Contributions Areas /General	263.77	Oppose	<p>The Financial Contributions provisions should be an exact replica of the Operative District Plan because the review of the Financial Contributions Policy has not yet been completed. Appendix 31A of The Operative Plan denotes the breakdown of "Non-Local Offsite" Financial Contributions (noting poor formatting in The Plan) and which has the Te Awa Structure Plan area being liable for a Local Off-site contribution of \$392,630 per ha, and a charge of \$ 2,548 per metre of road frontage. Conversely, Table 3 in APP-15 denotes Park Island (which the proposed Wharerangi Development Area was a part of in the Operative Plan) as being liable for a charge of \$392,630 per hectare and Te Awa only being denoted as paying a charge of \$2,548 per metre (road frontage).</p> <p>It is presumed that this is simply a typographic/editing error noting that the current Operative Plan provisions continue to prevail and advice from NCC officers is that this is indeed the case. The Submitter seeks clarity over this matter and any consequential changes required.</p>	Amend APP-15 to reflect the Operative District Plan appendices and the status quo until such time as the Development Contributions Policy is reviewed.
Mana Ahuriri Holdings Limited Partnership	Planning Maps /General /General	263.78	Amend	<p>Extend the LFRZ over the sites as denoted in Appendix 2 (see full submission) including retaining those sites already zoned as LFR in the Operative Plan as denoted in Appendix 2.</p> <p>Amend the Rural Production Zone to an Open Space Zone and a General Industrial Zone as denoted in Appendix 2 (see full submission).</p>	No relief sought. Inferred relief sought is to rezone land at Prebsensen Drive/Severn Street as per the submission point above.
Mana Ahuriri Holdings Limited Partnership	Planning Maps /General /General	263.79	Amend	<p>Rezone 20 Hospital Terrace and a part of 186 Battery Road from General Residential Zone and PREC3 to Medium Density Residential Zone (see Appendix 2 of full submission).</p> <p>Rezone 79 Napier Terrace and 102 Chaucer Road North from General Residential Zone and PREC3 to High Density Zone (see Appendix 2 of full submission).</p> <p>Rezone 2 Sixty Fifth Street and 2 Parade Street from General Residential Zone and PREC3 to Medium Density Residential Zone (see Appendix 2 of full submission).</p>	<p>No relief sought but inferred relief sought is as follows:</p> <ul style="list-style-type: none"> - Rezone 20 Hospital Terrace and a part of 186 Battery Road from General Residential Zone and PREC3 to Medium Density Residential Zone (see Appendix 2 of full submission). - Rezone 79 Napier Terrace and 102 Chaucer Road North from General Residential Zone and PREC3 to High Density Zone (see Appendix 2 of full submission). - Rezone 2 Sixty Fifth Street and 2 Parade Street from General Residential Zone and PREC3 to Medium Density Residential Zone (see Appendix 2 of full submission).
Mana Ahuriri Holdings Limited Partnership	Planning Maps /General /General	263.8	Amend	Re-zone 80 Auckland Road to from General Residential Zone to Medium Density Residential Zone as denoted in Appendix 2 of the full submission.	No relief sought however it is inferred that the submitter seeks to re-zone 80 Auckland Road to from General Residential Zone to Medium Density Residential Zone as denoted in Appendix 2 of the full submission.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Introduction /	263.81	Amend	The submitter seeks numerous changes to the Wharerangi Road Development Area chapter as shown in the full submission, Appendix 3.	Amend the Wharerangi Road Development Area chapter as outlined in Appendix 3 of the full submission.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Issues /DEV2-I1: Ad hoc development in the Wharerangi Road Development Area can result in inefficient provision of infrastructure, adverse cumulative effects on the capacity of the infrastructure network, and/or health, safety, and resilience issues for new residents	263.82	Amend	Seeks to make the following amendments: The <u>provision of</u> integrated infrastructure solutions for the Wharerangi Road Development Area <u>including the mitigation of potential inundation</u> will ensure that the <u>required development</u> full-density potential of the land is enabled through provision of sufficient capacity in the network. Taipo Stream located to the west of the Development Area provides a potential source of flooding for this low-lying area of land.	Amend as follows: The <u>provision of</u> integrated infrastructure solutions for the Wharerangi Road Development Area <u>including the mitigation of potential inundation</u> will ensure that the <u>required development</u> full-density potential of the land is enabled through provision of sufficient capacity in the network. Taipo Stream located to the west of the Development Area provides a potential source of flooding for this low-lying area of land.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Issues /DEV-I2: Recreation and connectivity	263.83	Amend	Seeks to amend as follows: People expect to have reasonable access to Napier City's coastal environment, TeWhanga (Ahuriri estuary), waterways, and recreational reserves. The maintenance and enhancement of public access to the coast and waterbodies are recognised in the RMA as matters of national importance. A number of key recreational and open space areas adjoin the Development Area. These include the Taipo Stream corridor, and the Park Island recreational area to the north. These play adjacent to the Wharerangi Road Development Area, provides an important recreational and amenity role for future residents and development should consider connections to these existing recreational areas. opportunity for access to this waterbody and also for continuous off-road public access to Ahuriri Estuary to the north. Further, the number of residential units able to be developed in this area generates additional demand for areas of recreation. To provide for the recreational needs of residents, the Wharerangi Road Development Area requires a new centralised neighbourhood reserve with connectivity to Taipo Stream and beyond.	Amend as follows: People expect to have reasonable access to Napier City's coastal environment, TeWhanga (Ahuriri estuary), waterways, and recreational reserves. The maintenance and enhancement of public access to the coast and waterbodies are recognised in the RMA as matters of national importance. A number of key recreational and open space areas adjoin the Development Area. These include the Taipo Stream corridor, and the Park Island recreational area to the north. These <u>play adjacent to the Wharerangi Road Development Area, provides an important recreational and amenity role for future residents and development should consider connections to these existing recreational areas. opportunity for access to this waterbody and also for continuous off-road public access to Ahuriri Estuary to the north.</u> Further, the number of residential units able to be developed in this area generates additional demand for recreational needs of residents, the Wharerangi Road Development Area requires a new centralised neighbourhood reserve with connectivity to Taipo Stream and beyond.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Issues /DEV2-I3: Rural context	263.84	Amend	Seeks to amend as follows: At the time of preparation of the Wharerangi Road Development Area, most of the land was and still is utilised for rural purposes. Productive use of land enables efficient use and economic benefits to be gained until such time as urban development occurs. Urban development may generate reverse sensitivity issues on rural land uses and can also detract from the visual amenity of the surrounding rural environment. The provisions of the Development Area seek to recognise this issue as the area is developed.	Amend as follows: At the time of preparation of the Wharerangi Road Development Area, most of the land was and still is utilised for rural purposes. Productive use of land enables efficient use and economic benefits to be gained until such time as urban development occurs. Urban development may generate reverse sensitivity issues on rural land uses and can also detract from the visual amenity of the surrounding rural environment. The provisions of the Development Area seek to recognise this issue as the area is developed.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Objectives /DEV2-O1: Integration of development and infrastructure provision	263.85	Amend	Seeks to amend as follows: Urban development and <u>the associated</u> provision of infrastructure in the Wharerangi Road Development Area occurs in an integrated and planned manner.	Amend as follows: Urban development and <u>the associated</u> provision of infrastructure in the Wharerangi Road Development Area occurs in an integrated and planned manner.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Objectives /DEV2-O2: Residential density	263.86	Amend	Seeks to amend as follows: A mixture of higher residential densities will assist in the provision of enable efficient and affordable provision of infrastructure solutions.	Amend as follows: A mixture of higher residential densities will assist in the provision of <u>enable efficient and affordable provision of infrastructure solutions.</u>
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Objectives /DEV2-O3: Connectivity	263.87	Amend	Seeks to amend as follows: Development <u>layout provides connectivity to links residents to the surrounding wider</u> environment including through the provision of integrated transport and reserve linkages.	Amend as follows: Development <u>layout provides connectivity to links residents to the surrounding wider</u> environment including through the provision of integrated transport and reserve linkages.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Objectives /DEV2-O4: Resilience	263.88	Amend	Seeks to amend as follows: Development is resilient to the <u>potential</u> effects of natural hazards including flooding from Taipo Stream.	Amend as follows: Development is resilient to the <u>potential</u> effects of natural hazards including flooding from Taipo Stream.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Objectives /DEV2-O5: Community wellbeing	263.89	Amend	Seeks to amend as follows: <u>Connections to pPublic open space reflects the needs of residents and contributes to community wellbeing in the Wharerangi Road Development Area.</u> Relates to DEV2-I2	Amend as follows: <u>Connections to pPublic open space reflects the needs of residents and contributes to community wellbeing in the Wharerangi Road Development Area.</u> Relates to DEV2-I2
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Objectives /DEV2-O6: Rural context	263.9	Amend	Seeks to amend as follows: Rural production is <u>enabled and rural amenity values are maintained</u> until such time as the land is developed for urban activities.	Amend as follows: Rural production is <u>enabled and rural amenity values are maintained</u> until such time as the land is developed for urban activities.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Policies /DEV2-P1: Provision of infrastructure	263.91	Amend	Seeks to amend as follows:Require subdivision and development in the development area to be coordinated with the provision of <u>sufficient</u> stormwater, wastewater, water supply, energy, and telecommunications infrastructure.	Amend as follows: Require subdivision and development in the development area to be coordinated with the provision of <u>sufficient</u> stormwater, wastewater, water supply, energy, and telecommunications infrastructure.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Policies /DEV2-P2: Density	263.92	Amend	Seeks to amend as follows: <u>Enable Require</u> residential development to contribute to Napier's housing supply and the efficient provision of infrastructure by providing a minimum net site density of 24 residential units per hectare. Relates to DEV2-O2	Amend as follows: <u>Enable Require</u> residential development to contribute to Napier's housing supply and the efficient provision of infrastructure by providing a minimum <u>net site</u> density of 24 residential units per hectare. Relates to DEV2-O2

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Policies /DEV2-P3: Connectivity and resilience	263.93	Amend	<p>Seeks to amend as follows:</p> <p>Subdivision and development <u>will</u> contributes <u>positively</u> to the connectivity and resilience of the area, including through:</p> <ol style="list-style-type: none"> providing key roads, active mode connections, and <u>connections to</u> open spaces consistent with the APP10 - Wharerangi Road Development Area Map; Mitigating potential ensuring development managed flooding effects so that risks to people and property are not increased including through <u>the use of</u> appropriately designed and sited stopbanks and flood attenuation devices providing sufficient floodplain storage, and minimising the use of cul-de-sacs. <p>Relates to DEV2-O3 and DEV2-O4</p>	<p>Seeks to amend as follows:</p> <p>Subdivision and development <u>will</u> contributes <u>positively</u> to the connectivity and resilience of the area, including through:</p> <ol style="list-style-type: none"> providing key roads, active mode connections, and <u>connections to</u> open spaces consistent with the APP10 - Wharerangi Road Development Area Map; <u>Mitigating potential</u> ensuring development managed flooding effects so that risks to people and property are not increased including through <u>the use of</u> appropriately designed and sited stopbanks and flood attenuation devices providing sufficient floodplain storage, and minimising the use of cul-de-sacs. <p>Relates to DEV2-O3 and DEV2-O4</p>
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Policies /DEV2-P5: Rural context	263.94	Amend	<p>Seeks to amend as follows:</p> <p>Recognise the <u>ongoing use of the Development Area interim rural context of the Wharerangi Development Area, including</u> by enabling non-intensive rural activities.</p>	<p>Amend as follows:</p> <p>Recognise the <u>ongoing use of the Development Area interim rural context of the Wharerangi Development Area, including</u> by enabling non-intensive rural activities.</p>
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /DEV2 - Wharerangi Road Development Area - Standards Table	263.95	Amend	<p>Seeks to amend as follows:</p> <p>DEV2-S1B</p> <p>Activity Status where standards are not met: Restricted Discretionary</p>	<p>Amend as follows:</p> <p>DEV2-S1B</p> <p>Activity Status where standards are not met: Restricted Discretionary</p>
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /DEV2 - Wharerangi Road Development Area - Standards Table	263.96	Amend	<p>Seeks to amend as follows:</p> <ol style="list-style-type: none"> Subdivision must provide for a minimum density of 24 residential units per hectare <u>net site area</u> (net of roads and reserves). 	<p>Amend as follows:</p> <ol style="list-style-type: none"> Subdivision must provide for a minimum density of 24 residential units per hectare <u>net site area</u> (net of roads and reserves).
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /DEV2 - Wharerangi Road Development Area - Standards Table /General	263.97	Amend	<p>Seeks to amend as follows:</p> <p><u>DEV2-S3: Supermarket - Commercial Activity – Local Centre Zone</u> <u>Purpose: to enable the provision of a single larger format supermarket to provide for the surrounding catchment</u></p> <p><u>DEV2-S3A</u></p> <p><u>Activity Status: Permitted Standards are:</u></p> <ol style="list-style-type: none"> <u>single tenancy of not greater than 2,500sqm gross Floor Area</u> <u>All other standards are achieved</u> <p><u>Activity Status where standards are not met:Restricted Discretionary</u></p>	<p>Amend as follows:</p> <p><u>DEV2-S3: Supermarket - Commercial Activity – Local Centre Zone</u> <u>Purpose: to enable the provision of a single larger format supermarket to provide for the surrounding catchment</u></p> <p><u>DEV2-S3A</u></p> <p><u>Activity Status: Permitted Standards are:</u></p> <ol style="list-style-type: none"> <u>single tenancy of not greater than 2,500sqm gross Floor Area</u> <u>All other standards are achieved</u> <p><u>Activity Status where standards are not met: Restricted Discretionary</u></p>
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Assessment criteria /DEV2-AC1: All subdivision and development	263.98	Amend	<p>Seeks to amend as follows:</p> <ol style="list-style-type: none"> The extent to which the proposed subdivision and/or development is <u>in general accordance consistent</u> with the Wharerangi Road Development Plan APP10. 	<p>Amend as follows:</p> <ol style="list-style-type: none"> The extent to which the proposed subdivision and/or development is <u>in general accordance consistent</u> with the Wharerangi Road Development Plan APP10.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Assessment criteria /DEV2-AC1: All subdivision and development	263.99	Amend	<p>Seeks to amend as follows:</p> <ol style="list-style-type: none"> Whether the proposed subdivision and/or development provides for the proposed walkway reserve connectivity <u>onto link to</u> between the neighbourhood reserve and <u>the Taipo Stream and Park Island.</u> The extent to which the proposed transport network enhances connectivity to the wider environment, including the Taipo Stream esplanade reserve and Park Island. The extent to which proposed streets are orientated north-south to maximise the quality of living environments including sunlight access. The extent to which the road layout enhances connectivity and achieves an integrated approach to land use and transportation planning. This includes: <ol style="list-style-type: none"> the incorporation of use of on-street traffic calming, including through methods such as cycle lanes, on-street car parking and berm design., shall be considered fundamental design elements of the street cross-section, and minimising the use of cul-de-sacs. 	<p>Amend as follows:</p> <ol style="list-style-type: none"> Whether the proposed subdivision and/or development provides for the proposed walkway reserve connectivity <u>onto link to</u> between the neighbourhood reserve and <u>the Taipo Stream and Park Island.</u> The extent to which the proposed transport network enhances connectivity to the wider environment, including the Taipo Stream esplanade reserve and Park Island. The extent to which proposed streets are orientated north-south to maximise the quality of living environments including sunlight access. The extent to which the road layout enhances connectivity and achieves an integrated approach to land use and transportation planning. This includes: <ol style="list-style-type: none"> the incorporation of use of on-street traffic calming, including through methods such as cycle lanes, on-street car parking and berm design., shall be considered fundamental design elements of the street cross-section, and minimising the use of cul-de-sacs.

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Assessment criteria /DEV2-AC1: All subdivision and development	263.1	Amend	Seeks to amend as follows: g. Whether the proposed subdivision and/or development provides for the consistent landscaping treatment of streets and reserves that <u>will</u> contribute to urban amenity and landscape values and retains and enhances vistas through the Wharerangi Road Development Area.	Amend as follows: g. Whether the proposed subdivision and/or development provides for the consistent landscaping treatment of streets and reserves that <u>will</u> contribute to urban amenity and landscape values and retains and enhances vistas through the Wharerangi Road Development Area.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Assessment criteria /DEV2-AC1: All subdivision and development.	263.101	Amend	Seeks to amend as follows: h. Whether the proposed subdivision and/or development al ensures that development manages flooding effects so that the risks to people and property (including infrastructure) are not increased. for all flood events.	Amend as follows: h. Whether the proposed subdivision and/or development al ensures that development manages flooding effects so that the risks to people and property (including infrastructure) are not increased. for all flood events.
Mana Ahuriri Holdings Limited Partnership	DEV2 - Wharerangi Road Development Area /Assessment criteria /DEV2-AC1: All subdivision and development	263.102	Amend	Seeks to amend as follows: j. Whether there is sufficient capacity in the existing or proposed utilities network, and public reticulated water supply, wastewater, and stormwater network to service the proposed development.	Amend as follows: j. Whether there is sufficient capacity in the existing or proposed utilities network, and public reticulated water supply, wastewater, and stormwater network to service the proposed development.