

Submitter Name	Section / Sub-section / Provision	Submission number / Point Number	Position	Summary of Submission	Relief Summary
Kāinga Ora – Homes and Communities	General /General /General	285.1	Support	Submitter provides an overall introduction to its roles and responsibilities to give effect to Government policies. Submitter provides general information on its objectives, position and interest in the PDP. Generally support the PDP's alignment with the NPS-UD, medium to high-density housing, and papakāinga chapters. Seek amendments to ensure enabling standards and reflect zoning frameworks. Submitter recognizes the challenges Napier City faces with population growth and believes the PDP will help accommodate it. Generally support the PDP but seek amendments for more reflective development provisions. See original submission for full details.	No relief sought
Kāinga Ora – Homes and Communities	GRZ - General Residential Zone /GRZ - General Residential Zone - Standards Table /General	285.2	Oppose	Opposes the use of the word 'maintain and enhance' within the purpose statements in the respective 'Standards Tables' of the GRZ, MRZ and HRZ. Seeks that these are amended to refer to the 'planned built environment' in line with the objectives and policies of each zone and Policy 6 of the NPS-UD. The consequential requirement for development to 'maintain and enhance' the existing character of an area conflicts with the overall direction of the PDP to enable growth and intensification.	Amend to refer to the 'planned built environment' in line with the objectives and policies of each zone and Policy 6 of the NPS-UD. The consequential requirement for development to 'maintain and enhance' the existing character of an area conflicts with the overall direction of the PDP to enable growth and intensification.
Kāinga Ora – Homes and Communities	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /General	285.3	Oppose	Opposes the use of the word 'maintain and enhance' within the purpose statements in the respective 'Standards Tables' of the GRZ, MRZ and HRZ.	Amend to refer to the 'planned built environment' in line with the objectives and policies of each zone and Policy 6 of the NPS-UD. The consequential requirement for development to 'maintain and enhance' the existing character of an area conflicts with the overall direction of the PDP to enable growth and intensification.
Kāinga Ora – Homes and Communities	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /General	285.4	Oppose	Opposes the use of the word 'maintain and enhance' within the purpose statements in the respective 'Standards Tables' of the GRZ, MRZ and HRZ.	Amend to refer to the 'planned built environment' in line with the objectives and policies of each zone and Policy 6 of the NPS-UD. The consequential requirement for development to 'maintain and enhance' the existing character of an area conflicts with the overall direction of the PDP to enable growth and intensification.
Kāinga Ora – Homes and Communities	GRZ - General Residential Zone /GRZ - General Residential Zone - Rules Table /GRZ-R1: Residential units and residential activity	285.5	Amend	Seeks that the permitted number of dwellings be increased as follows: (a) GRZ-R1A – Increase the number of dwellings permitted on site within the GRZ from 1 to 2 dwellings,	Increase the number of dwellings permitted on site within the GRZ from 1 to 2 dwellings,
Kāinga Ora – Homes and Communities	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Rules Table /MRZ-R1: Residential units and residential activity	285.6	Amend	Seeks that the permitted number of dwellings be increased as follows: (a) MRZ-R1A – Increase the number of dwellings permitted on site within the MRZ from 1 to 3 dwellings; and	Increase the number of dwellings permitted on site within the MRZ from 1 to 3 dwellings
Kāinga Ora – Homes and Communities	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Rules Table /HRZ-R1: Residential units and residential activity	285.7	Amend	Seeks that the permitted number of dwellings be increased as follows: (a) HRZ-R1A – Increase the number of dwellings permitted on site from 1 to 3 dwellings.	Increase the number of dwellings permitted on site from 1 to 3 dwellings.
Kāinga Ora – Homes and Communities	MRZ - Medium Density Residential Zone /MRZ - Medium Density Residential Zone - Standards Table /MRZ-S14: Maximum building length	285.8	Oppose	Opposes MRZ-S14 and HRZ-S14 and seeks that these maximum building length standards of 22m are deleted. Considers that the purpose of this standard is to manage visual dominance; however, this is already appropriately managed by maximum heights, height in relation to boundary and yard setback standards. building length standards of 22m are deleted.	Delete maximum building length standards of 22m
Kāinga Ora – Homes and Communities	HRZ - High Density Residential Zone /HRZ - High Density Residential Zone - Standards Table /HRZ-S14: Maximum building length	285.9	Oppose	Opposes MRZ-S14 and HRZ-S14 and seeks that these maximum building length standards of 22m are deleted. Considers that the purpose of this standard is to manage visual dominance; however, this is already appropriately managed by maximum heights, height in relation to boundary and yard setback standards.	Delete maximum building length standards of 22m
Kāinga Ora – Homes and Communities	GRZ - General Residential Zone /Assessment criteria /GRZ-AC1: Residential units (GRZ-R1); Minor residential units (GRZ-R3); Relocated buildings (GRZ-R9); Retirement village premises (GRZ-R10)	285.10	Oppose	Opposes the inclusion of Design Guidelines in the District Plan and seeks that reference to these are deleted. Considers that these act as de-facto rules to be complied with. Opposes any policy or rule approach which would require development proposals to comply with such design guidelines in the District Plan. Considers that Design Guidelines should be treated as a non- statutory tool and should sit outside the Plan as guidance regarding best practice design outcomes. Seeks that any specific design guideline be relocated within a specific rule, matter of discretion or assessment criterion. Where particular design outcomes are to be achieved, these should be specified in matters of discretion or assessment. Notes that reference to design guidance that is regulated by another Council removes the ability for Council to adapt the guidance to reflect best practice and the planned built environment for the local urban environment of Napier City.	Delete reference to Design Guidelines in the District Plan
Kāinga Ora – Homes and Communities	MRZ - Medium Density Residential Zone /Assessment criteria /MRZ-AC1: Residential units (MRZ-R1); Relocated buildings (MRZ-R5); Retirement village premises (MRZ-R6)	285.11	Oppose	Opposes the inclusion of Design Guidelines in the District Plan and seeks that reference to these are deleted. Considers that these act as de-facto rules to be complied with. Opposes any policy or rule approach which would require development proposals to comply with such design guidelines in the District Plan. Considers that Design Guidelines should be treated as a non- statutory tool and should sit outside the Plan as guidance regarding best practice design outcomes. Seeks that any specific design guideline be relocated within a specific rule, matter of discretion or assessment criterion. Where particular design outcomes are to be achieved, these should be specified in matters of discretion or assessment. Notes that reference to design guidance that is regulated by another Council removes the ability for Council to adapt the guidance to reflect best practice and the planned built environment for the local urban environment of Napier City.	Delete reference to Design Guidelines in the District Plan

Kāinga Ora – Homes and Communities	HRZ - High Density Residential Zone /Assessment criteria /HRZ-AC1: Residential units (HRZ-R1); Relocated buildings (HRZ-R5); Retirement village premises (HRZ-R6)	285.12	Oppose	Opposes the inclusion of Design Guidelines in the District Plan and seeks that reference to these are deleted. Considers that these act as de-facto rules to be complied with. Opposes any policy or rule approach which would require development proposals to comply with such design guidelines in the District Plan. Considers that Design Guidelines should be treated as a non- statutory tool and should sit outside the Plan as guidance regarding best practice design outcomes. Seeks that any specific design guideline be relocated within a specific rule, matter of discretion or assessment criterion. Where particular design outcomes are to be achieved, these should be specified in matters of discretion or assessment. Notes that reference to design guidance that is regulated by another Council removes the ability for Council to adapt the guidance to reflect best practice and the planned built environment for the local urban environment of Napier City.	Delete reference to Design Guidelines in the District Plan
Kāinga Ora – Homes and Communities	CCZ - City Centre Zone /Policies /CCZ-P3: Quality public realm	285.13	Oppose	Opposes the use of the words ‘maintain and enhance’ within Policy CCZ-P3 and within the purpose statements of the standards table. Seeks these are amended to refer to the ‘planned built environment’ in line with Policy 6 of the NPS-UD. The consequential requirement for development to ‘maintain and enhance’ the existing character of an area conflicts with the overall direction of the PDP to enable growth and intensification	Amend to refer to the ‘planned built environment’ in line with Policy 6 of the NPS-UD.
Kāinga Ora – Homes and Communities	CCZ - City Centre Zone /CCZ - City Centre Zone - Standards Table /CCZ-S2: Building setback at upper floors	285.14	Amend	Supports standard CCZ-S2 as a way of enabling greater heights whilst also managing potential adverse effects on the receiving environment. However, seeks that a diagram be inserted within this standard to clearly illustrate the application as this would be beneficial for plan users.	Seeks that a diagram be inserted within this standard to clearly illustrate the application.
Kāinga Ora – Homes and Communities	CCZ - City Centre Zone /Assessment criteria /CCZ-AC3: New buildings (CCZ-R7)	285.15	Amend	Supports engagement with and the involvement of mana whenua on developments, impacting on a site of significance and associated cultural values, however considers that the inclusion of ‘mana whenua values to inform the design of the building’ as assessment criteria within CCZ-AC3 for any new building within the City Centre would imply that a Cultural Values Assessment or Cultural Impact Assessment for all proposals for new buildings within this zone would be required. Seeks clarification as to whether this was the intention of the assessment criteria and seeks changes to the criteria to clarify its intended purpose.	Seeks clarification as to whether this was the intention of the assessment criteria and seeks changes to the criteria to clarify its intended purpose.
Kāinga Ora – Homes and Communities	PKA - Papakainga /PKA - Papakainga - Standards Table /PKA-S1: Height	285.16	Oppose	Supports the inclusion of provisions relating to papakāinga developments within the PDP; however, Papakāinga developments should be subject to the same activity status and permitted standards, amended in accordance with this submission (see 6(a)(ii) above), as residential activities/dwellings within the GRZ, MRZ and the HRZ. Opposes a tailored maximum height, yard setbacks and building coverage associated with papakāinga.	Opposes a tailored maximum height, yard setbacks and building coverage associated with papakāinga.
Kāinga Ora – Homes and Communities	PKA - Papakainga /PKA - Papakainga - Standards Table /PKA-S2: Front yards	285.17	Oppose	Supports the inclusion of provisions relating to papakāinga developments within the PDP; however, Papakāinga developments should be subject to the same activity status and permitted standards, amended in accordance with this submission (see 6(a)(ii) above), as residential activities/dwellings within the GRZ, MRZ and the HRZ. Opposes a tailored maximum height, yard setbacks and building coverage associated with papakāinga.	Opposes a tailored maximum height, yard setbacks and building coverage associated with papakāinga.
Kāinga Ora – Homes and Communities	PKA - Papakainga /PKA - Papakainga - Standards Table /PKA-S7: Building coverage.	285.18	Amend	Supports the inclusion of provisions relating to papakāinga developments within the PDP; however, Papakāinga developments should be subject to the same activity status and permitted standards, amended in accordance with this submission (see 6(a)(ii) above), as residential activities/dwellings within the GRZ, MRZ and the HRZ. Opposes a tailored maximum height, yard setbacks and building coverage associated with papakāinga.	Opposes a tailored maximum height, yard setbacks and building coverage associated with papakāinga.
Kāinga Ora – Homes and Communities	PKA - Papakainga /PKA - Papakainga - Rules Table /PKA-R2: Papakāinga	285.19	Oppose	Supports the inclusion of provisions relating to papakāinga developments within the PDP; however, questions the inclusion under rule PKA-R2A of a requirement for general title land to have been held in ancestral ownership ‘continuously’ since the declaration. Seeks that the provisions reduce the barriers that Māori face in the development of papakāinga, acknowledging that general title land may be owned by Māori, but this may not have been ‘continuously’ as the proposed provisions requires. Requests amendments to the wording of these provisions to reduce the regulatory barriers, following further hui with Mana Whenua and Council.	Amend the wording of these provisions to reduce the regulatory barriers, following further hui with Mana Whenua and Council.
Kāinga Ora – Homes and Communities	SUB - Subdivision /SUB - Subdivision - Standards Table /SUB-S1: Minimum allotment sizes - residential	285.20	Support	Supports the proposed subdivision provisions, to the extent that these enable for a controlled activity pathway, with no minimum lot size, for subdivisions that are associated with a land use consent (SUB-S1(1)).	Retain as notified.
Kāinga Ora – Homes and Communities	SUB - Subdivision /SUB - Subdivision - Standards Table /SUB-S2: Minimum allotment sizes - commercial and industrial	285.21	Oppose	Opposes the proposed minimum lot size for vacant lot subdivision, being 350m ² within SUB-S1(2).	Amend so that within the GRZ, the minimum vacant allotment size is 300m ² ; that within the MRZ and HRZ, a minimum shape factor of 8m x 15m. This shape factor shall be located outside of: Land which may be subject to instability or is otherwise geotechnically unsuitable; Network Utilities, including private and public lines.
Kāinga Ora – Homes and Communities	SW - Stormwater /SW - Stormwater - Standards Table /SW-S1: Hydraulic mitigation	285.22	Oppose	Opposes the proposed Earthworks standards limiting the permitted volume of earthworks to 50m ³ per site, for any 12-month period, across all residential zones and precincts (EW-S1). Submitter acknowledges this is reflective of the operative provisions, however seeks that this be increased to 250m ³ , to ensure that a level of land disturbance, consistent with the level of development anticipated through the PDP, is provided for as a permitted activity.	Increase to 250m ³ , to ensure that a level of land disturbance, consistent with the level of development anticipated through the PDP, is provided for as a permitted activity.
Kāinga Ora – Homes and Communities	SW - Stormwater /SW - Stormwater - Standards Table /SW-S1: Hydraulic mitigation	285.23	Amend	Support the use of engineering techniques and the attenuation of stormwater on-site to control the potential effects of development on the stormwater network and the surrounding environment. However, the requirement to provide for retention systems (SW-S1), fails to acknowledge that this is just one potential solution for attenuation.	Amend so that any requirement for retention be included as one solution but not necessarily the solution; i.e. soakage and detention systems could also be utilised to address potential effects of development. Any consequential changes necessary to give effect to the changes highlighted above or in the appendices attached.

Kāinga Ora – Homes and Communities	Planning Maps /General /General	285.24	Amend	Submitter generally submits that the plan is amended to ensure that Kāinga Ora can carry out its statutory obligations as a housing provider; ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991; Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development; Provide clarity for all plan users; and Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.	Generally seeks that the specific amendments, additions or retentions which are sought as specifically outlined in this submission, are accepted and adopted into the PDP, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.
Kāinga Ora – Homes and Communities	SUB - Subdivision /SUB - Subdivision - Standards Table /SUB-S1: Minimum allotment sizes - residential	285.25	Oppose	Opposes the proposed minimum lot size for vacant lot subdivision, being 350m ² within SUB-S1(2).	Amend so that within the GRZ, the minimum vacant allotment size is 300m ² ; that within the MRZ and HRZ, a minimum shape factor of 8m x 15m. This shape factor shall be located outside of: Land which may be subject to instability or is otherwise geotechnically unsuitable; Network Utilities, including private and public lines.