

9 September 2022

Attn: Development Planning Unit
Waimakariri District Council
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Submission lodged via email: developmentplanning@wmk.govt.nz

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON VARIATION 1:
HOUSING INTENSIFICATION TO THE PROPOSED WAIMAKARIRI DISTRICT
PLAN UNDER CLAUSE 6 OF SCHEDULE 1 OF THE
RESOURCE MANAGEMENT ACT 1991**

This is a submission on Variation 1: Housing Intensification (“V1”) from Waimakariri District Council (“the Council” or “WDC) on the Proposed Waimakariri District Plan (“the Proposed Plan” or “PDP”):

The specific provisions of the proposal that this submission relates to:

Variation 1: Housing Intensification in its entirety.

The Kāinga Ora submission is:

1. Kāinga Ora Homes and Communities (“**Kāinga Ora**”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
 - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
 - b) Support good access to jobs, amenities and services; and
 - c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.

2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across the Canterbury Region including the Waimakariri District.
3. Kāinga Ora therefore has an interest in Variation 1: Housing Intensification and how it:
 - i. Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”) and The Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (“**the Housing Supply Act**”);
 - ii. Minimises barriers that constrain the ability to deliver housing development across public housing, affordable housing, affordable rental, and market housing; and
 - iii. Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. The Kāinga Ora submission supports the following parts of Variation 1: Housing Intensification:
 - i. Inclusion of the mandatory objectives and policies and rules set out in Schedule 3A of the ‘Housing Supply Act’; and
 - ii. The spatial extent of the Medium Density Residential zones (MRZ) in Kaiapoi, Woodend, Pegasus and Ravenswood. Including the new greenfield area in Rangiora being zoned MRZ.
5. The Kāinga Ora submission supports in part or opposes and seeks amendments to Variation 1: Housing Intensification in the following topic areas:
 - i. Overall, Kāinga Ora considers that V1 as notified does not sufficiently provide for a range of housing types at a range of intensities to meet the needs of current and future communities.
 - ii. Kāinga Ora considers that residential intensification in and around Rangiora Town Centre should be further encouraged and enabled in accordance with the NPS-UD. This is in line with the imperatives of the NPS-UD which notes that compact urban form in the context of existing urban areas requires further intensification.

- iii. The NPS-UD requires building height and density of urban form adjacent to town centre zones to be commensurate with the level of commercial activity and community services. Kāinga Ora is of the view that the Variation as notified does not incorporate the required density uplifts as required by the NPS-UD particularly in the larger Town Centre of Rangiora. Kāinga Ora seeks the inclusion of a Height Variation Control for the area identified for higher density housing around this town centre in the Proposed Plan. The Height Variation Control would allow for residential buildings up to 19m in height or five stories. An uplift in zoning of this area from medium density to high density residential is not been sought as the requested height variation control coupled with the density of urban form proposed is considered to be commensurate with the level of commercial activity and commercial services provided for and enabled within the Town Centre Zone as applied to Rangiora, which is observed as less than other town centre locations within other areas of Christchurch region.
- iv. Kāinga Ora generally support the qualifying matters with minor amendments and clarifications as proposed with the exception of: the Christchurch International Airport noise contour, the high flood hazard overlay in Kaiapoi, National Grid transmission lines and strategic and arterial roads in Rangiora, Kaiapoi and Woodend which are opposed by Kāinga Ora for the reasons included in **Appendix 1**.
- v. Kāinga Ora considers that qualifying matters need to be expressed more clearly across V1 to assist with plan administration and interpretation. The qualifying matters are contained within different chapters of the plan and have been incorporated in different ways. Some are within the district wide general rules chapters (and are mapped as overlays) and others have been incorporated within the MRZ built form standards. Kāinga Ora notes that further clarity in how each of the qualifying matters are applied to the MDRS standards is required. It is not clear whether some of the matters preclude MDRS entirely on a site in an overlay, or limit density or another of the MDRS built form standards (e.g. increased setbacks).
- vi. Kāinga Ora submits that changes to policies, rules and matters of discretion are necessary to better reflect the requirements and intent of the 'the Housing Supply Act' and NPS-UD. Kāinga Ora considers that V1 is not currently framed to recognise that as the character of planned urban areas evolves to deliver a more intensive and compact urban form, amenity values will change. There is still a

focus on 'maintaining existing character' rather than enabling anticipated changes in density of development overtime throughout V1. Amendments are sought to ensure this is reflected more consistently throughout the provisions, in language that is consistent with the NPS-UD.

- vii. Kāinga Ora's submission seeks changes to rules to address errors (in activity status) to align with Schedule 3A of the Housing Supply Act, or to reduce duplication where the standards introduced via Schedule 3A overlap with PDP provisions that are not proposed to be deleted from the MRZ as part of V1.
 - viii. Kāinga Ora's submission seeks more concise/ succinct matters of discretion that are easily understood, clearly state the outcomes intended, and provide for design innovation and choice. The proposed assessment matters for the MRZ are lengthy, with rule MRZ -MD2 specifying nearly 30 individual matters. The scope and extent of these assessment matters provide such broad discretion that they undermine the 'Housing Supply Act's' intent of a restricted discretionary activity status. Accordingly, Kāinga Ora seeks that these assessment matters are consolidated and simplified.
 - ix. Kāinga Ora supports nationally consistent matters of discretion for MDRS standards, whilst allowing for some evidence based local context nuances. Kāinga Ora supports the use of consistent 'Urban Design Principle' matters of discretion in District Plans throughout the country. .
 - x. The submission seeks such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission above and in **Appendix 1**.
6. The changes requested are made to:
- i. Ensure that Kāinga Ora can carry out its statutory obligations;
 - ii. Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
 - iii. Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
 - iv. Provide clarity for all plan users; and

- v. Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.
7. The Kāinga Ora submission points and changes sought can be found within Table 1 of **Appendix 1** which forms the bulk of the submission.

Kāinga Ora not a trade competitor:

8. Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that: Adversely affects the environment; and does not relate to trade competition or the effects of trade competition.

Kāinga Ora seeks the following decision from Waimakariri District Council:

9. That the specific amendments, additions or retentions which are sought in the submission above and those specifically outlined in **Appendix 1**, are accepted and adopted into the PDP via Variation 1, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

Kāinga Ora wishes to be heard in support of their submission:

10. Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its submission on Variation 1: Housing Intensification to address the matters raised in its submission prior to the variation being heard.
11. If others make a similar submission, Kāinga Ora would be willing to consider presenting a joint case with them at a hearing.
12. Kāinga Ora seeks to continue an open dialogue with the Council prior to producing evidence for a hearing



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Appendix 1: Decisions sought ‘Variation 1: Housing Intensification’

The following table sets out the amendments sought to the Variation 1: Housing Intensification and also identifies those provisions that Kāinga Ora supports.

Please note that the 1 September amendments made to the online version of the Proposed District Plan are not covered in the submission, due to the late stage that they were uploaded. These are understood to be minor clause 16 amendments that do not change substantive content.

Proposed changes are shown as ~~strikethrough~~ for deletion and underlined for proposed additional text.

Table 1

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
Part 1 - Introduction and General Provision					
1.1	Te whakamāramatanga - Interpretation Definitions	Definition of 'Multi-unit Residential Development'	Oppose	Consistent with its submission on the PDP, Kāinga Ora seeks deletion of the definition of "multi-unit residential development" as it is not a term used in the 'NPS-UD' or 'Housing Supply Act' along with consequential changes to the provisions to assist with simplification of plan administration and interpretation.	Delete the definition of 'multi-unit residential development' in its entirety and any reference to the definition or term across the Proposed Plan. MULTI-UNIT RESIDENTIAL DEVELOPMENT: means development involving more than one-three residential unit (but excluding any minor residential unit or residential unit in a retirement village) undertaken comprehensively over one or more sites, and may include zero lot development, townhouses, apartments or terrace housing.
1.2	Te whakamahi māhere - How the plan works	Relationships between spatial layers –Table RSL- 1 Qualifying Matters	Support in part	Kāinga Ora consider that qualifying matters need expressing more clearly across V1 to assist with simplification of plan administration and interpretation. Kāinga Ora considers that Table RSL0 1 Qualifying Matters should more clearly and	Amend provisions relating to qualifying matters to provide additional clarity as to how each of the qualifying matters apply to MDRS and the MRZ standards.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>comprehensively describe the qualifying matters and how each of these, limit intensification.</p> <p>Kāinga Ora also note that while some of the qualifying matters are listed in the MRZ Built Form Standards, others are contained in the general rules chapters and overlays. Further, some of the chapters in Part 2 of the PDP (eg: historic heritage and notable trees) have been updated to include a reference to qualifying matters, but again not clearly expressed as a rule or in a way that provides clarity as to how the qualifying matter affects the MRZ provisions. It is not clear whether some of the matters preclude MDRS entirely or limit only density or another of the MDRS built form standards, or limit built form only on specific parts of sites. Noting this, Kāinga Ora consider that greater clarity and certainty is required as to the nature, extent and implications of qualifying matters proposed under V1.</p>	
Qualifying Matters - General Comments					
1.3	Qualifying Matter Electricity	- National grid transmission lines.	Oppose	Kāinga Ora oppose the National Grid Transmission Lines being a qualifying matter.	Delete the electricity/ national grid qualifying matter.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<ul style="list-style-type: none"> - National Grid transmission lines within Medium Density Residential Zone in north-west Rangiora). <p><i>As mapped in qualifying matter, national grid subdivision corridor.</i></p>		<p>Kāinga Ora, oppose the 39m setback 'National Grid Subdivision Corridor' included in V1 as the s32 assessment lacks a strong evidence base for this scale of setback as a qualifying matter.</p>	<p>Delete 39m setback 'National Grid Subdivision Corridor' as a qualifying matter.</p> <p>See further comments in SUB - 6 and MRZ -BFS5 about improving clarity of the rule.</p>
1.4	Qualifying Matter Transport	<ul style="list-style-type: none"> - Railway Corridors: Railway designations adjacent to parts of the Town Centre within Medium Density Residential Zone of Rangiora and Kaiapoi. <p><i>As mapped in qualifying matter, rail corridors</i></p> <ul style="list-style-type: none"> - Strategic Roads and Arterial Roads: Properties within Medium Density Residential Zone immediately adjoining strategic and arterial roads in Rangiora, Kaiapoi and Woodend). 	<p>Oppose Rail Corridors QM.</p> <p>Oppose the 'Strategic and Arterial Roads' QM.</p>	<p>Kāinga Ora oppose the rail corridor being a qualifying matter as the s32 assessment lacks a strong evidence based for the scale of setback as a qualifying matter.</p> <p>Kāinga Ora oppose the Strategic and Arterial Roads qualifying matter. Some of the roads covered by this matter are not State Highways and therefore are not considered 'nationally significant infrastructure'. The basis for this qualifying matter is otherwise unclear from the s32 evaluation, however Kāinga Ora consider that residential amenity can be maintained through design standards; and road network management can be provided for within existing road corridors or Notices of Requirement to alter such corridors.</p>	<p>Delete the Railway Corridor qualifying matter.</p> <p>Delete the Strategic and Arterial Roads qualifying matter. See further comments to MRZ-BFS5 in this submission.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
1.5	Qualifying Matter Natural Hazards (Urban)	<p>- Properties within Kaiapoi Urban area within the High Hazard flood overlay.</p> <p><i>As mapped in qualifying matter, natural hazards.</i></p>	Support in Part	<p>Kāinga Ora support the management of significant risks from natural hazards as a qualifying matter (in appropriate circumstances), noting that it is a matter of national significance in Section 6.</p> <p>Kāinga Ora generally supports the risk-based approach to the management of natural hazards. However, consistent with its submission on the PDP, Kāinga Ora opposes flooding hazard information being incorporated as overlays within the PDP and now as a qualifying matter. These hazards are dynamic and are subject to constant change through hazard mitigation works and reshaping of ground contours (for individual sites or developments, or for wider areas).</p> <p>Spatial identification of flood hazard areas should be made available through a set of non-statutory flood hazard maps, which would operate as interactive maps on the Council’s GIS website – thereby operating as a separate mapping viewer to the statutory DP maps. This approach is different to that of the traditional means of displaying hazard overlays on district plan maps and reflects that these maps do not</p>	<p>Amend the provisions to remove/delete the mapped Natural Hazard Overlays from within the PDP. Instead, the Natural Hazard Overlays should be based on non-statutory map layers in the Waimakariri District Natural Hazards Interactive Viewer that sits outside the PDP. Not included in the Proposed Plan and Variation.</p> <p>Specific text amendments are covered below under MRZ- BFS1.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>have regulatory effect. The advantage of this approach is the ability to operate a separate set of interactive maps which are continually subject to improvement and updates, outside of and without a reliance on the Schedule 1 Resource Management Act 1991 process. Kāinga Ora notes that this is an approach taken by other Councils around the country.</p>	
1.5	Qualifying Matter Airport noise - Christchurch International Airport	<p>- Properties within the Medium Density Residential Zone of Kaiapoi and within the Christchurch International Airport noise contour.</p> <p><i>As mapped in qualifying matter, airport noise.</i></p>	Oppose	<p>Consistent with its submission on the PDP Kāinga Ora opposes the airport noise contour as a qualifying matter. Kāinga Ora seeks the deletion of the Aircraft/ Airport noise provisions in full including any mapped noise overlays and contour maps.</p> <p>Kāinga Ora also opposes all provisions related to the Airport Noise Contour in the PDP and seeks all relevant airport noise contour provisions in the PDP including objectives, policies, rules and standards (with any associated tables, figures and overlays) are removed from the PDP.</p>	Delete this qualifying matter and any proposed provisions in the Variation.
1.6	Qualifying Matter Historic Heritage	<p>- Properties identified as a Heritage listed item within Medium Density Residential Zone of Rangiora, Kaiapoi and Woodend).</p>	Oppose	Kāinga Ora support the identification of historic heritage qualifying matters, in appropriate circumstances, noting that heritage is a matter of national significance in Section 6.	Retain heritage as a qualifying matter, and amend the rule package to clearly state that the heritage rules in (HH - R1 to HH-R9) apply in addition to the activity rules and built form standards in the MRZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
		<p><i>As mapped in qualifying matter heritage building or item.</i></p>		<p>However, it is not clear in the V1 text what this qualifying matter is seeking to limit (be less enabling of). For example, does the QM mean that MDRS standards do not apply to sites containing heritage buildings? Or is it that the heritage rules still apply in addition to the MDRS rules?</p> <p>In Kāinga Ora’s view, except where there is site specific justification to exclude a site from the MDRS on heritage grounds, the general heritage rules in the District Plan sufficiently recognise and provide for heritage values. Such rules provide a suitable framework for considering new buildings on the site, alterations to heritage buildings, or the demolition/removal of heritage buildings.</p>	<p>(Rather than MDRS being precluded on heritage sites generally).</p>
1.7	Qualifying Matter Notable Trees	<p>- Properties with a notable tree within Medium Density Residential Zone of Rangiora, Kaiapoi and Woodend.</p> <p><i>As mapped in qualifying matter, notable tree.</i></p>	Oppose	<p>Kāinga Ora support the notable tree qualifying matter.</p> <p>However, it is not clear in the variation text what this qualifying matter is seeking to limit (be less enabling of). For example, does the QM mean that MDRS standards do not apply to sites containing notable trees? Or is it that the tree rules still apply in addition to the MDRS rules.</p>	<p>Retain notable trees as a qualifying matter, and amend the rule package to clearly state that the tree rules in (TREE-R1 to TREE 7) apply in addition to the activity rules and built form standards in the MRZ. (Rather than MDRS being precluded on sites with notable trees generally).</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>In Kāinga Ora’s view, except where there is site specific justification to exclude a site from the MDRS, the general rules in the District Plan sufficiently recognise and provide for the management of notable trees. Such rules provide a suitable framework for considering new buildings in proximity to notable trees, or their removal.</p>	
1.8	Qualifying Matter Natural Character – Waterbody setbacks	<p>- Properties adjoining a large waterbody within Medium Density Residential Zone of Rangiora, Kaiapoi and Woodend.</p> <p><i>As mapped in scheduled natural character freshwater bodies schedule 2, and schedule 3.</i></p>	Oppose	<p>Kāinga Ora support the Natural Character Waterbody setbacks qualifying matter noting it is a relevant matter of national significance in Section 6.</p> <p>However, it is not clear in the Variation text what this qualifying matter is seeking to limit (be less enabling of). For example, does the QM mean that MDRS standards do not apply to sites containing waterbodies? Or is it that the water body setbacks rules still apply in addition to the MDRS rules?</p> <p>In Kāinga Ora’s view, except where there is site specific justification to exclude a site from the MDRS, the general rules in the District Plan sufficiently recognise and provide for the management of water body setbacks. Such rules provide a suitable</p>	Retain the waterbody setbacks as a qualifying matter and amend the rule package to clearly state that the waterway rules (in NATC -R7 to R9 and NATC-S1 to S2) apply in addition to the activity rules and built form standards in the MRZ. (Rather than preclude MDRS on a site with a waterway setback generally).

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>framework for considering new buildings and development in proximity to waterbodies.</p>	
1.9	Qualifying Matter Open space – Recreation Zone	<p>- Properties vested as recreation/ or utility reserve and owned by the Waimakariri District Council and located within Rangiora, Kaiapoi, Woodend and Pegasus.</p> <p><i>As mapped in qualifying matter, open space and recreation zone.</i></p>	Oppose	<p>Kāinga Ora considers this qualifying matter is unnecessary and should be deleted.</p> <p>While the use of areas for open space purposes is identified as a qualifying matter under RMA s770(f), the areas zoned Open Space and Recreation Zones (OSRZ) are owned by WDC and approximately half of the zoned OSRZ is administered under the Reserves Act 1977. Council ownership, and zoned OSRZ, makes it unlikely that these areas will be developed for medium density housing and such development would also be contrary to the purposes for which these sites were reserved. Further, the Housing Supply Act only requires WDC to incorporate MDRS into every relevant residential zone (not Open Space Zone).</p> <p>The PDP open space rules (OSZ-R10 and SARZ-R10) only permit residential activity where it is ancillary park management activity (i.e.: caretaker accommodation).</p> <p>The existing rules and Reserves Act requirements will ensure that any medium</p>	Delete the Open Space (recreation zone) qualifying matter and any relevant provisions proposed in its entirety.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>density housing activity is unlikely to eventuate and will not have adverse effects on the open spaces. Accordingly, this qualifying matter is considered unnecessary.</p>	
1.10	Qualifying Matter Public Access: esplanade reserves	<p>- Land adjoining waterways within Medium Density Residential Zone, vested in recreation reserve and owned by the Waimakariri District Council and located within Rangiora, Kaiapoi, Woodend and Pegasus.</p> <p><i>As mapped in esplanade provisions.</i></p>	Oppose	<p>Kāinga Ora considers this qualifying matter is unnecessary and should be deleted.</p> <p>While the use of areas for open space purposes is identified as a qualifying matter under RMA s770(f), esplanade reserves are vested with/ owned by WDC and are administered under the Reserves Act 1977. Council ownership makes it unlikely that these areas will be developed for medium density housing and such development would also be contrary to the purposes for which these sites were reserved.</p> <p>The existing rules and Reserves Act requirements will ensure that any MDRS activity is unlikely to eventuate and will not have adverse effects on esplanade reserves. Accordingly, this qualifying matter is considered unnecessary.</p>	Delete the Open Space (esplanade reserves) qualifying matter and any relevant proposed provisions in its entirety.

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Part 2 – District Wide Matters					
Part 2 – Strategic Directions					
2.1	SD - Ruataki ahunga- Strategic directions	SD - 02 Well- functioning urban environments	Support	Kāinga Ora support the inclusion of this mandatory objective as per Schedule 3A, Part 1 (6).	Retain as notified.
Part 2 – SUB - Subdivision - Wāwāhia whenua					
2.2	SUB - Activity Rules	SUB- R2 Subdivision – Medium Density Residential Zone.	Support in part	In accordance with its earlier submission on the PDP Kāinga Ora generally support the rule as proposed. Amendment is sought to introduce the word ‘Vacant’ to describe the standard. This is to clarify the relationship between the creation of vacant sites through subdivision, and the establishment of reduced site sizes that are deemed acceptable through an approved land use consent for residential development.	Amend to state that the standard only applies to the creation of vacant lots.
2.3	SUB - Activity Rules	SUB- R6 Subdivision - Subdivision within the National Grid Yard / Subdivision Corridor	Oppose	Kāinga Ora oppose the National Grid Transmission Lines as a qualifying matter, including the proposed 39m setback required in the ‘National Grid Subdivision Corridor’ as adequate evidence has not been provided in the S32 analysis to justify this and explain why the setback is required.	Delete the qualifying matter for the ‘National Grid Subdivision Corridor’ including the 39m setback.
2.4	SUB – Subdivision Standards	SUB-1 – Allotment size and dimensions and Table SUB: 1	Support in part	Kāinga Ora support having no minimum lot size/ area for the MRZ. It is important that	Amend the rule/table to delete any reference to the QM for airport

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		Minimum allotment sized and dimensions.		<p>the rules are clear that no minimums apply where a subdivision application is accompanied by evidence or an application that demonstrates compliance with MDRS. Subdivision as a controlled activity is likewise supported.</p> <p>In place of a minimum lot size/ area Kāinga Ora support minimum shape/ dimension requirements for vacant lot subdivisions. And request that one be added of 8m x 15m.</p> <p>The minimum lot size for the natural hazard QM is supported if the relevant maps are outside of the District Plan as noted above.</p> <p>Kāinga Ora oppose the minimum lot sizes proposed for the airport noise contour and national grid transmission line qualifying matters.</p>	<p>noise and national grid transmission lines and the 200m² minimum lot size associated with these.</p> <p>Add a minimum shape factor of 8m x 15m for vacant lot subdivisions in the MRZ.</p>
Part 3 – Area Specific Matters					
Part 3 - RESZ - Whitua Nohonoho - Residential Zones					
3.1	RESZ - Whitua Nohonoho - Residential Zones	General Objectives and Policies for all Residential zones – RES-P3(3), and RES-P8 (3).	Support	Kāinga Ora support the inclusion of these mandatory policies as per Schedule 3A, Part 1 (6).	Retain as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
3.2	RESZ - Whaitua Nohonoho - Residential Zones	General Objectives and Policies for all Residential zones – RES-P15 – Medium Density Residential Standards.	Support in part	<p>Kāinga Ora support the inclusion of this mandatory policy as per Schedule 3A, Part 1 (6).</p> <p>In order to ensure appropriate levels of intensification around centres are encouraged and enabled in accordance with the NPS-UD, the Kāinga Ora submission seeks the inclusion of a greater building height for the MRZ within the area around the Rangiora Town Centre that was identified for a higher density of housing in the Proposed Plan. The policy needs to be amended to provide for additional height and intensification around the TCZ.</p>	<p>Amend policy as follows:</p> <p><u>Medium Density Residential Standards</u></p> <p><u>Apply the Medium Density Residential Standards across all relevant residential zones in the District Plan except in circumstances where greater building height is provided for in an identified area near Rangiora Town Centre and a qualifying matter is relevant (including matters of significance such as historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga).</u></p>

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3.3	MRZ – Medium Density Residential Zone Objectives and Policies	MRZ-O1 Housing types and sizes	Support in part	<p>Kāinga Ora support the inclusion of this mandatory objective per Schedule 3A, Part 1 (6) of the Housing Supply Act.</p> <p>In order to ensure appropriate levels of intensification around centres are encouraged and enabled in accordance with the NPS-UD the Kāinga Ora submission seeks the inclusion of a Height Variation Control Area for the MRZ within the area around the Rangiora Town Centre that was identified for higher density housing in the Proposed Plan, enabling residential development of up to 19m in height or 5 stories. The objective needs to be amended to provide for additional height and intensification around the TCZ.</p>	<p>Amend policy as follows:</p> <p><u>Housing types and sizes</u></p> <p><u>The Medium Density Residential Zone provides for a variety of housing types and sizes that respond to:</u></p> <ul style="list-style-type: none"> <u>i. housing needs and demand; and</u> <u>ii. the neighbourhood's planned urban built character, including 3 storey buildings and up to 5 stories where identified.</u>
3.4	MRZ – Medium Density Residential Zone Objectives and Policies	MRZ-P1 Housing Types	Support in Part	<p>Kāinga Ora support the inclusion of this mandatory policy per Schedule 3A, Part 1 (6) of the Housing Supply Act.</p> <p>In order to ensure appropriate levels of intensification around centres are encouraged and enabled in accordance with the NPS-UD the Kāinga Ora submission</p>	<p>Amend policy as follows:</p> <p><u>Housing types</u></p> <p><u>Enable a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-</u></p>

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				seeks a Height Variation Control Area for the MRZ within the area around the Rangiora Town Centre that was identified for higher density housing in the Proposed Plan. The objective needs to be amended to provide for additional height and intensification around the Rangiora TCZ.	rise apartments, including apartments of up to 5 stories in an identified area near Rangiora Town Centre.
3.5	MRZ – Medium Density Residential Zone Objectives and Policies	MRZ-P2 Housing Developments	Support	Kāinga Ora support the inclusion of this mandatory policy per Schedule 3A, Part 1 (6) of the Housing Supply Act.	Retain as notified
3.6	MRZ – Medium Density Residential Zone Objectives and Policies	MRZ – P3 Residential Character	Oppose	<p>In accordance with its submission on the PDP Kāinga Ora seeks wholesale changes to this policy to align with the ‘NPS-UD’ and ‘Housing Supply Act’ and better describe the character and amenity <u>anticipated</u> for the zone.</p> <p>MRZ-P3 states: ‘<i>Maintain the character anticipated for the zone</i>’ this is an oxymoron. Kāinga Ora seek that this is reworded to: “<i>Enable development to achieve the character and amenity values anticipated for the zone</i>” (or words of similar effect).</p> <p>Kāinga Ora seeks changes to the provisions to focus on achieving the anticipated built</p>	Delete the policy as notified. Amend the policy to reflect the intent of the ‘NPS-UD’ and ‘Housing Supply Act’ and remove subjective and vague terminology and provide for specific outcomes.

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				<p>form of the proposed zones. This requested change is consistent with language used in the NPS-UD.</p> <p>The policy also contains a number of subjective or vague terms, for example: <i>'High quality building and landscape design', 'appropriate streetscape landscaping', 'positive contribution to streetscape character'</i> and <i>'Provides for a peaceful residential environment'</i>. Clarification is necessary to confirm what outcomes are sought.</p>	
Part 3 – MRZ Medium Density Residential Zone Activity Rules					
3.7	MRZ – Medium Density Residential Zone Activity Rules	MRZ – R2 Residential unit	Oppose	<p>In accordance with its submission on the PDP Kāinga Ora does not support the current rule framework, whereby multi-unit residential development is considered under a separate rule (MRZ-R18). Kāinga Ora seeks integration of rule MRZ-R18 with MRZ- R2.</p>	Delete MRZ-R2 as notified. Amend rule by combining MRZ-R2 and MRZ-R18 and removing reference to 'multi- unit development'.
3.8	MRZ – Medium Density Residential Zone Activity Rules	MRZ - R3 Minor residential unit	Support	Kāinga Ora support deletion of this rule as it is no longer necessary.	Retain as notified.
3.9	MRZ – Medium Density Residential Zone Activity Rules	MRZ – R18 Multi-unit residential development	Oppose	Kāinga Ora seeks changes so that the rule only applies when there are more than three units proposed, that a design	Delete MRZ-R18 in its entirety and incorporate within MRZ-R2 as per above. Rule shall apply to more than

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>statement is not required and that this triggers RDIS status not DIS with assessment against RES-MD2 only. This aligns with the changes sought to MRZ-R2.</p> <p>As noted at MRZ-R2 – Kāinga Ora opposes “multi-unit residential development” being subject to its own rule and instead seeks its integration with MRZ-R2. Deletion of this rule is sought.</p>	<p>three units, not require a design statement, be RD with matters of discretion limited to MRZ-R2.</p> <p>MRZ-R187 Multi-unit residential development</p> <p>Activity status: RDIS</p> <p>Where:</p> <p>1. any residential unit fronting a road or public open space shall have a habitable room located at the ground level;</p> <p>2. at least 50% of all residential units within a development shall have a habitable space located at ground level; and</p> <p>3. 1. a design statement shall be provided with the application.</p> <p>Matters of discretion are restricted to:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>RES-MD2 – Residential design principles</p> <p>RES-MD7 – Outdoor storage</p> <p>Notification</p> <p>An application for a restricted discretionary activity under this rule is precluded from being publicly or limited notified.</p> <p>Activity status when compliance not achieved: DIS</p>
Part 3 – MRZ Medium Density Residential Zone Built Form Standards					
3.10	MRZ – Medium Density Residential Zone Built Form Standards	MRZ - BFS1 Site Density (old standard – PDP)	Support	Kāinga Ora support the deletion of this density standard.	Retain the deletion as notified.
3.11	MRZ – Medium Density Residential Zone Built Form Standards	MRZ - BFS1 Number of residential units per site (new standard V1)	Support in part	<p>Kāinga Ora support the inclusion of this mandatory rule as per Schedule 3A, Part 2 (10) of the Housing Supply Act.</p> <p>However, Kāinga Ora seek amendments to the rules to delete the airport noise QM</p>	Amend the rule to delete the airport noise QM and provide certainty as to how the natural hazards QM limits density.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>and clarify how the natural hazard QM applies to limit density.</p> <p>The rule permits up to 3 units per site except within the QM natural hazards there must be no more than one residential unit per site. Kāinga Ora seek to clarify the minimum site size required in the natural hazard QM. Noting that this should be as specified in SUB-S1.</p>	<p><i>Kāinga Ora seeks amendments to the rule, as listed below or changes with similar effect':</i></p> <p><u>MRZ-BFS1 Number of residential units per site:</u></p> <p>1. <u>There shall be no more than 3 residential units per site, except where:</u></p> <p>a. <u>Within the qualifying matters - natural hazards area and qualifying matters –airport noise, there must be no more than 1 residential unit per:site</u></p> <p>- 200m² for Kaiapoi Area A.</p> <p>- 500m² for Kaiapoi Area B:</p> <p>Activity status when compliance not achieved: RDIS</p> <p>Matters of discretion are restricted to:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<ul style="list-style-type: none"> • RES-MD2 - Residential design principles • RES-MD15 - Effects from qualifying matters—airport noise • RES-MD16 - Effects from qualifying matters - natural hazards. <p><u>Notification</u> <u>An application for the construction and use of 4 or more residential units that <i>does comply with standards MRZ-BFS-2,3,4,5,6,7,8,9,10,11,12</i> is precluded from being publicly or limited notified.</u></p> <p><u>An application for the construction and use of 4 or more residential units that <i>does not comply with 1 or more of MRZ-BFS-2,3,4,5,6,7,8,9,10,11,12</i> is precluded from being publicly notified.</u></p>
3.12	MRZ – Medium Density Residential Zone Built Form Standards	MRZ – BFS2 Building Coverage	Support	Kāinga Ora support the inclusion of this mandatory rule as per Schedule 3A, Part 2 (14) of the Housing Supply Act.	Retain as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
3.13	MRZ – Medium Density Residential Zone Built Form Standards	MRZ – BFS3 Landscaped Permeable surface.	Oppose	Kāinga Ora request deletion of this rule as it duplicates new MRZ - BFS12 that contains the mandatory wording in Schedule 3A, Part 2 (18) of the Housing Supply Act.	Delete MRZ- BFS3.
3.14	MRZ – Medium Density Residential Zone Built Form Standards	MRZ – BFS4 Height	Support in part	<p>Kāinga Ora support the inclusion of this mandatory rule as per Schedule 3A, Part 2 (11) of the Housing Supply Act. However, seek the following amendments:</p> <ul style="list-style-type: none"> - Kāinga Ora note that the activity status for this rule is incorrect and not aligned with the requirements of schedule 3A Part 1 (4) of the Housing Supply Act. The activity status for non-compliance with this rule should be restricted discretionary (RDSI) not discretionary (DIS). Matters of discretion relate to impacts on neighbours. - In order to ensure appropriate levels of intensification around centres are encouraged and enabled in accordance with the NPS-UD the Kāinga Ora submission seeks the inclusion of a Height Variation Control Area for the MRZ within the area around the 	<p>Amend the rule as follows:</p> <p>MRZ-BFS4 Height</p> <ol style="list-style-type: none"> 1. <u>Buildings must not exceed 11 metres in height, except that 50% of a building's roof in elevation, measured vertically from the junction between wall and roof, may exceed this height by 1 metre, where the entire roof slopes 15° or more, as shown in Figure MRZ-1 except in the Height Variation Control area, buildings must not exceed 19 metres in height.</u> <p><u>Activity status when compliance not achieved: DIS-RDIS</u></p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Rangiora Town Centre that was identified for higher density housing in the Proposed Plan. The rule needs to be amended to provide for additional height and intensification around the TCZ. Refer to Map in Appendix 2.</p> <p>An uplift in zoning of this area from medium density to high density residential has not been sought as the requested height variation control coupled with the density of urban from proposed is considered to be commensurate with the level of commercial activity and commercial services provided for and enabled within the Town Centre Zone as applied to Rangiora, which is observed as less than other town centre locations within other areas of Christchurch region.</p>	<p>Matters of discretion are restricted to: RES-MD5 - Impact on neighbouring property.</p>
3.15	MRZ – Medium Density Residential Zone Built Form Standards	MRZ- BFS5 Building and structure setbacks	Support in part	<p>Kāinga Ora support the inclusion of the mandatory setback rule as per Schedule 3A, Part 2 (13) of the Housing Supply Act.</p> <p>However, Kāinga Ora considers that the wording in V1 as presently written contains additional restrictions over and above those included in the setback rule contained in Schedule 3A of the Housing</p>	<p>Delete existing rule and amend the rule to:</p> <ul style="list-style-type: none"> - Clearly express any additional setbacks over and above those contained Schedule 3A, Part 2 (13) as qualifying matters.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Supply Act. In the absence of robust justification in the s32 evaluation, the additional setbacks introduced for QM's should be removed from the Plan.</p> <p>Kāinga Ora also consider that the matters of discretion in RES- MD2 are not the appropriate matters for dealing with setback issues. The list of some 30 matters is too broad ranging and requires a full UD assessment of the proposal. Instead, the relevant matters can be found in RES-MD5 and RESMD6.</p>	<ul style="list-style-type: none"> - Delete the rail corridor setback QM. - Amend the national grid transmission line setback. - Simplify the rule to reflect Schedule 3A, Part 2 (13). - Delete part 3 of the rule and associated figure MRZ-2. - Delete RES-MD2 Residential Design Principles as a relevant matter of discretion. - Insert RES-MD6 Road Boundary Setbacks as a relevant matter of discretion. <p><i>Kāinga Ora seeks amendments to the rule, similar or same, to the matters listed below or changes with similar effect':</i></p> <p>MRZ- BFS5 Building and structure setbacks</p> <p>(1) Buildings must be set back from the relevant boundary by the minimum depth listed in the yards table below except as listed in (2):</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Yard Minimum depth</p> <p>Front 1.5 metres</p> <p>Side 1 metre</p> <p>Rear 1 metre (excluded on corner sites)</p> <p>(2) Qualifying Matters:</p> <p>(a) All buildings shall be set back a minimum of 5m from any site boundary with the rail corridor.</p> <p>(b) Any building or structure shall be set back a minimum of 12m from any National Grid support structure as per rule EI-R51.</p> <p>(3) This standard does not apply to site boundaries where there is an existing common wall between 2 buildings on adjacent sites or where a common wall is proposed.</p> <p>Activity status when compliance not achieved: RDIS</p> <p>Matters of discretion are restricted to:</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<ul style="list-style-type: none"> • RES-MD2 Residential design principles • RES-MD5 - Impact on neighbouring property • RES-MD6 Road Boundary Setbacks
3.16	MRZ – Medium Density Residential Zone Built Form Standards	MRZ- BFS6 Street Interface	Oppose	<p>Kāinga Ora request deletion of this rule as it duplicates the outcomes sought by new MRZ - BFS11 that contains the mandatory wording in Schedule 3A, Part 2 (18) of the Housing Supply Act.</p> <p>BFS6 also contains additional built form standards controlling front doors and garages that go beyond those included Schedule 3A, Part 2 of the ‘Housing Supply Act’ and that are not qualifying matters. Kāinga Ora note the need for a high evidential threshold to justify the inclusion of additional built form standards beyond those specified in the Amendment Act and in the absence of such justification, it seeks the deletion of this standard.</p>	Delete MRZ- BFS6.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
3.17	MRZ – Medium Density Residential Zone Built Form Standards	MRZ-BFS7 Height in relation to boundary	Support in part	<p>Kāinga Ora support the inclusion of this mandatory rule as per Schedule 3A, Part 2 (12) of the Housing Supply Act.</p> <p>However, Kāinga Ora consider that the matters of discretion in RES- MD2 are not the appropriate matters for dealing with boundary issues. The list of some 30 matters is too broad ranging and requires a full UD assessment of the proposal. Instead, the relevant matters for this rule can be found in RES-MD5 Impacts on Neighbouring Properties.</p>	<p>Amend the rule to delete RES-MD2 Residential Design Principles as a relevant matter of discretion:</p> <p>Activity status when compliance not achieved: RDIS</p> <p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> • RES-MD2 – Residential design principles • RES-MD5 - Impact on neighbouring property
3.18	MRZ – Medium Density Residential Zone Built Form Standards	MRZ-BFS8 Fencing	Support in part	<p>BFS8 is not included Schedule 3A, Part 2 of the 'Housing Supply Act' and is an additional built form matter. Kāinga Ora note the need for a high evidential threshold to justify the inclusion of additional built form standards beyond those specified in the Amendment Act.</p> <p>Kāinga Ora seek amendments to simplify the rule as it is considered unduly restrictive when compared to the potential effects. Further it is considered that the rule should only relate to fencing on the</p>	<p>Amend MRZ- BFS8 as follows:</p> <p>MRZ-BFS8 Fencing</p> <ol style="list-style-type: none"> 1. All fencing or walls fronting the road boundary; or within 2m of a site boundary with a public reserve, walkway or eyeleway shall be: <ol style="list-style-type: none"> a. no higher than 1.2m above ground level for solid fences; or

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>road boundary and not boundaries with walk and cycle ways.</p> <p>Kāinga Ora consider that the matters of discretion in RES- MD2 are not the appropriate matters for dealing with fence issues. The list of some 30 matters is too broad ranging and requires a full UD assessment of the proposal. The relevant matter of discretion are found in MD6.</p>	<p>b. where fences exceed 1.2m in height shall be at least 50% visually permeable up to a maximum height of 1.8m. the site is a corner site, on one road boundary the height can be increased to 1.8m above ground level where at least 45% of the fence is visually permeable.</p> <p>2. Any fence greater than 0.9m in height above ground level shall be at least 45% visually permeable as depicted in Figure MRZ-4, within 5m of any accessway, or within the structure and vegetation set back area shown in Figure MRZ-2.</p> <p>Activity status when compliance not achieved: RDIS</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>Matters of discretion are restricted to:</p> <p>RES-MD2—Residential design principles</p> <p>RES-MD6 - Road boundary setback</p> <p>....</p>
3.19	MRZ – Medium Density Residential Zone Built Form Standards	MRZ – BFS9 Outdoor Living Space (per unit)	Support	Kāinga Ora support the inclusion of this mandatory rule as per Schedule 3A, Part 2 (15) of the ‘Housing Supply Act’.	Retain as notified.
3.20	MRZ – Medium Density Residential Zone Built Form Standards	MRZ-BFS10 Outlook Space (per unit)	Support	<p>Kāinga Ora support the inclusion of this mandatory rule as per Schedule 3A, Part 2 (16) of the ‘Housing Supply Act’.</p> <p>It is noted that there is an error in the naming of associated Figure MRZ-5. This should read ‘Outlook space’.</p>	Retain as notified but amend Figure MRZ-5 to read ‘Outlook space’.
3.21	MRZ – Medium Density Residential Zone Built Form Standards	MRZ-BFS11 Windows to the street	Support	Kāinga Ora support the inclusion of this mandatory rule as per Schedule 3A, Part 2 (17) of the ‘Housing Supply Act’.	Retain as notified.
3.22	MRZ – Medium Density Residential Zone Built Form Standards	MRZ-BFS12 Landscaped area	Support	Kāinga Ora support the inclusion of this mandatory rule as per Schedule 3A, Part 2 (18) of the ‘Housing Supply Act’.	Retain as notified.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
Part 3 – RESZ - Whaitua Nohonoho - Residential Zones – Matters of Discretion for all Residential Zones					
3.23	Matters of Discretion for all Residential Zones	RES-MD2 Residential Design Principles	Oppose	<p>Kāinga Ora oppose RES-MD2 as notified.</p> <p>Kāinga Ora’s seek more concise/ succinct matters of discretion that are clear, easily understood, clearly state the outcomes intended, and provide for design innovation and choice. The proposed assessment matters in rule MRZ -MD2 specify nearly 30 individual matters. The scope and extent of these assessment matters provide such broad discretion that they undermine the ‘Housing Supply Act’s’ intent of a restricted discretionary activity status.</p> <p>Kāinga Ora supports nationally consistent matters of discretion for MDRS standards, whilst allowing for some evidence based local context nuances. In particular, Kāinga Ora supports the use of consistent ‘Urban Design Principles’ in District Plans throughout the country.</p> <p>Kāinga Ora recommend the matters are reworded to capture the anticipated context (rather than the receiving environment) in line with the ‘Housing</p>	<p>Delete RES-MD2 as notified.</p> <p>Amend the matters of discretion to:</p> <ul style="list-style-type: none"> - Reflect the intent of the ‘Housing Supply Act’ and ‘NPS-UD’, - Clearly state the outcomes intended, and provide for design innovation and choice, - Achieve nationally consistent UDP MD’s (as suggested below), - Apply only to the development of four or more units. - Reflect the anticipated context rather than the receiving environment, - Reduce the number of matters to 5- 6, and - Avoid duplication with other matters of discretion applying to MRZ.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>Supply Act' and NPS-UD and changes to the proposed matters of discretion to sufficiently address the likely changes to amenity values while providing for a range of housing typologies.</p> <p>The matters seem particularly onerous when applied to a single residential unit with a single boundary setback non-compliance. Noting that a number of the 'boundary' standards list this as a RD matter. RES-MD2 was clearly intended to apply to scenarios where 4 or more units are proposed.</p> <p>The structure of the RES-MD2 Residential Design Principles is confusing. In each of the 6 design principles, there appears to be a sentence outlining the principle, and then specific assessment matters under each of these sentences. Considering these are assessment matters, having six overarching design principles is not necessary.</p> <p>There also appears to be an overlap between the residential design principles and other matters of discretion, it is</p>	<p><i>Kāinga Ora seeks amendments to the matters of discretion, similar or same, to the matters listed below:</i></p> <ol style="list-style-type: none"> 1. <u><i>The scale and form of the development is compatible with the planned urban built form of the neighbourhood;</i></u> 2. <u><i>The development contributes to a safe and attractive public realm and streetscape;</i></u> 3. <u><i>The extent and effects on the three waters infrastructure, achieved by demonstrating that at the point of connection the infrastructure has the capacity to service the development.</i></u> 4. <u><i>The degree to which the development delivers quality on-site amenity and occupant privacy that is appropriate for its scale.</i></u>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				recommended that the assessment matters be consolidated to avoid duplication.	
3.24	Matters of Discretion for all Residential Zones	RES-MD12 Outlook Space	Oppose	<p>Kāinga Ora oppose RES-MD12 as notified.</p> <p>Kāinga Ora consider these assessment matters are confusing and contain subjective terms. For example, in point 2 what is <i>'sense of space'</i> and in point 3 how would one assess a <i>'visual perception of cramped living conditions'</i>? The perception could vary significantly from person to person.</p> <p>Further, Kāinga Ora note that this rule is primarily about 'outlook' not access to sunlight.</p> <p>The matters require consideration of access to natural sunlight on the shortest day of the year. As distinct from access to daylight, access to natural sunlight on the shortest day of the year would simply not be possible for a south facing habitable space or several other different arrangements and orientations.</p>	<p>Delete MD12 as notified and amend matters of discretion to remove subjective terms and reference measurable outcomes. Remove reference to receiving natural sunlight and daylight 'especially on the shortest day of the year'.</p> <p>RES-MD12 Outlook space</p> <ol style="list-style-type: none"> 1. The ability of the affected habitable room to receive natural sunlight and daylight especially on the shortest day of the year. 2. The extent to which habitable rooms have an outlook and sense of space. 3. The degree to which a reduction in outlook space would contribute to a visual perception of cramped living conditions. 4. The extent to which visual privacy is provided between habitable rooms of

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>different residential units, on the same or adjacent sites.</p> <p><i>Kāinga Ora seeks amendments to the matters of discretion, similar or same, to the matters listed below or changes with similar effect’:</i></p> <ol style="list-style-type: none"> 1. <u><i>The ability of the affected habitable rooms to receive daylight.</i></u> 2. <u><i>The visual and landscape quality of the outlook space from the habitable rooms.</i></u> 3. <u><i>The extent to which visual privacy is provided between habitable rooms of different residential units, on the same sites.</i></u> 4. <u><i>The extent to which the development provides additional outlook spaces from habitable rooms.</i></u>
3.25	Matters of Discretion for all Residential Zones	RES-MD13 Windows to the Street	Oppose	Kāinga Ora seek that RES-MD13 Windows to Street be consolidated with RES – MD6 Road Boundary Setbacks as the points are	Delete RES-MD13 and combine with RES-MD6.

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>interrelated. The number of individual matters could also be reduced.</p>	<p><i>Kāinga Ora seeks amendments to the matters of discretion, similar or same, to the matters listed below or changes with similar effect’:</i></p> <p>RES-MD6 Road boundary setback</p> <ol style="list-style-type: none"> 1. The effect of a building’s reduced setback on amenity and visual streetscape values. especially where the frontage is to an arterial road or collector road that has a gateway function to a township. 2. The extent to which the reduced setback of the building is opposite any Residential Zones, Rural Zones, or Open Space and Recreation Zones and the effects of a reduced setback on the amenity and outlook of those zones. 3. The extent to which the building presents a visually attractive frontage to the street through the

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>inclusion of glazing, ancillary offices, and showrooms in the front façade.</p> <p>4. The extent to which the visual effects of a reduced setback are mitigated through site frontage landscaping, the width of the road corridor, and the character of existing building setbacks in the wider streetscape.</p> <p>5. The extent to which the front façade provides for visual engagement with adjacent streets and any other adjacent public open spaces.</p> <p>6. The extent to which the development incorporates CPTED principles as required to achieve a safe, secure environment.</p> <p>RES-MD13 Windows to street</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					<p>7. The extent to which the development engages with adjacent streets and any other adjacent public open spaces and contributes to them being lively, safe and attractive.</p> <p>8. The extent to which the development is designed to minimise the visual bulk of the buildings and provide visual interest, when viewed from the street.</p> <p>9. The extent to which the development incorporates CPTED principles as required to achieve a safe, secure environment.</p>
3.26	Matters of Discretion for all Residential Zones	RES-MD14 Landscaped Areas	Support in part	Kāinga Ora seek deletion of matter of discretion 1(d) relating to heat effects from intensification and impervious surfaces. It is not clear what expert assessment would be required to address this matter and this could be disproportionate the scale of the non-compliance (eg: 1% short of the 20% landscaping requirement). The deletion of matter of discretion 2 is also sought as it	<p>Amend the matters of discretion to delete points 1(d) and 2 as shown:</p> <p>RES-MD14 Landscaped areas</p> <p>1. The extent to which the proposed landscaping enhances residential amenity and is integrated within the site design to:</p>

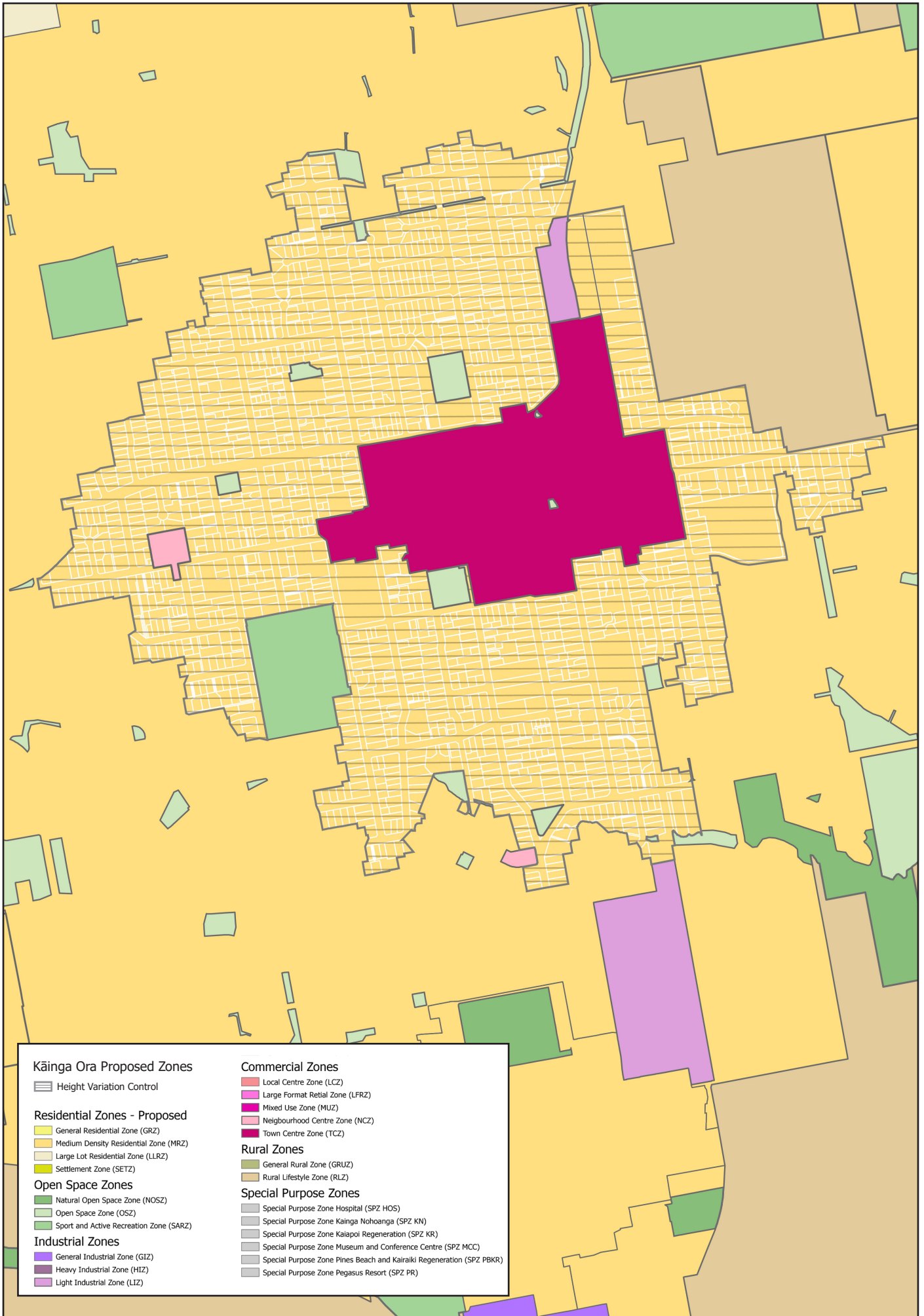
ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
				<p>appears to relate more to building design considerations than landscaping.</p>	<ul style="list-style-type: none"> a. define and enhance on-site outdoor living spaces; b. reduce the visual impact of large buildings through screening and planting; c. screen service areas, loading areas, and outdoor storage areas from public vantage points; and d. mitigate the heat effects from intensification and impervious surfaces. <p>2. The extent to which the development incorporates CPTED principles as required to achieve a safe, secure environment.</p> <p>3. The effects on the permeability of the site for stormwater run-off and subsequent effects on adjoining sites.</p>

ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
3.27	Matters of Discretion for all Residential Zones	RES-MD15 Effects from qualifying matters – airport noise	Oppose	For the reasons outlined above under submission point (1.4) the airport noise qualifying matter is opposed by Kāinga Ora in its entirety including these associated matters of discretion.	Delete RES-MD15 in its entirety.
3.28	Matters of Discretion for all Residential Zones	RES-MD16 Effects from qualifying matters – natural hazards	Support	For the reasons outlined above under submission point (1.5) the mapping of flooding natural hazards as a qualifying matter is opposed in its entirety by Kāinga Ora. The matters of discretion contain no reference to mapping and are therefore supported.	Retain as notified.
3.29	Matters of Discretion for all Residential Zones	RES-MD17 Building Coverage	Oppose	Kāinga Ora consider that the matters should be reworded to capture the <i>anticipated</i> context (rather than the receiving environment) in line with the ‘Housing Supply Act’ and NPS-UD. Further the provision of adequate outdoor living space is a separate issue covered by another MDRS rule and therefore RES-MD17 should be deleted.	Amend matters of discretion to refer to ‘Compatibility of the built form with the <u>anticipated character</u> of the area’ and to delete point 2 relating to outdoor living space as follows: <u>Building Coverage</u> 1. <u>Effects on visual amenity values, including dominance, and the compatibility of the built form with the anticipated character of the area. With the receiving environment.</u>

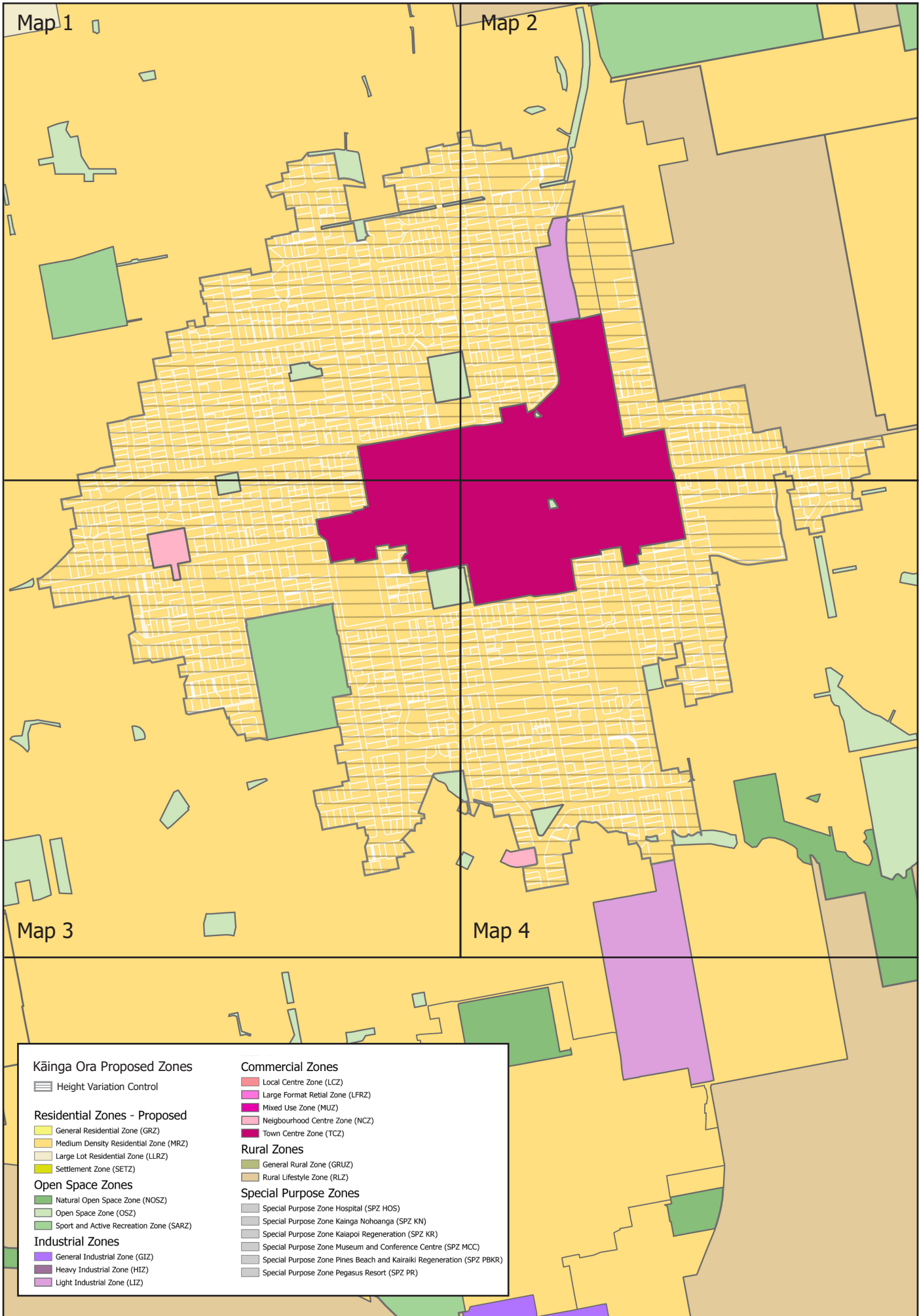
ID	Section of Plan	Specific Provision	Support/Support in Part/Oppose	Reasons	Relief Sought
					2. Provision of adequate outdoor living space on site.
Part 3 - Area Specific Matters - Wāhanga waihanga - Development Areas New - Development Areas					
3.30	SWR - Southwest Rangiora Development Area	Zone Maps and ODP	Support in Part	Kāinga Ora support the new MRZ within the SWR Development Area but note that there are discrepancies between the extent of the MRZ area shown on the ODP and the underlying zone maps.	Amend zoning maps or ODP to address inconsistencies.
3.31	NER - North East Rangiora Development Area	Zone Maps and ODP	Support in part	Kāinga Ora support the new MRZ within the NER Development Area but note that there are discrepancies between the extent of MRZ area shown on the ODP and the undelaying zone maps.	Amend zoning maps or ODP to address inconsistencies.

Appendix 2: Maps

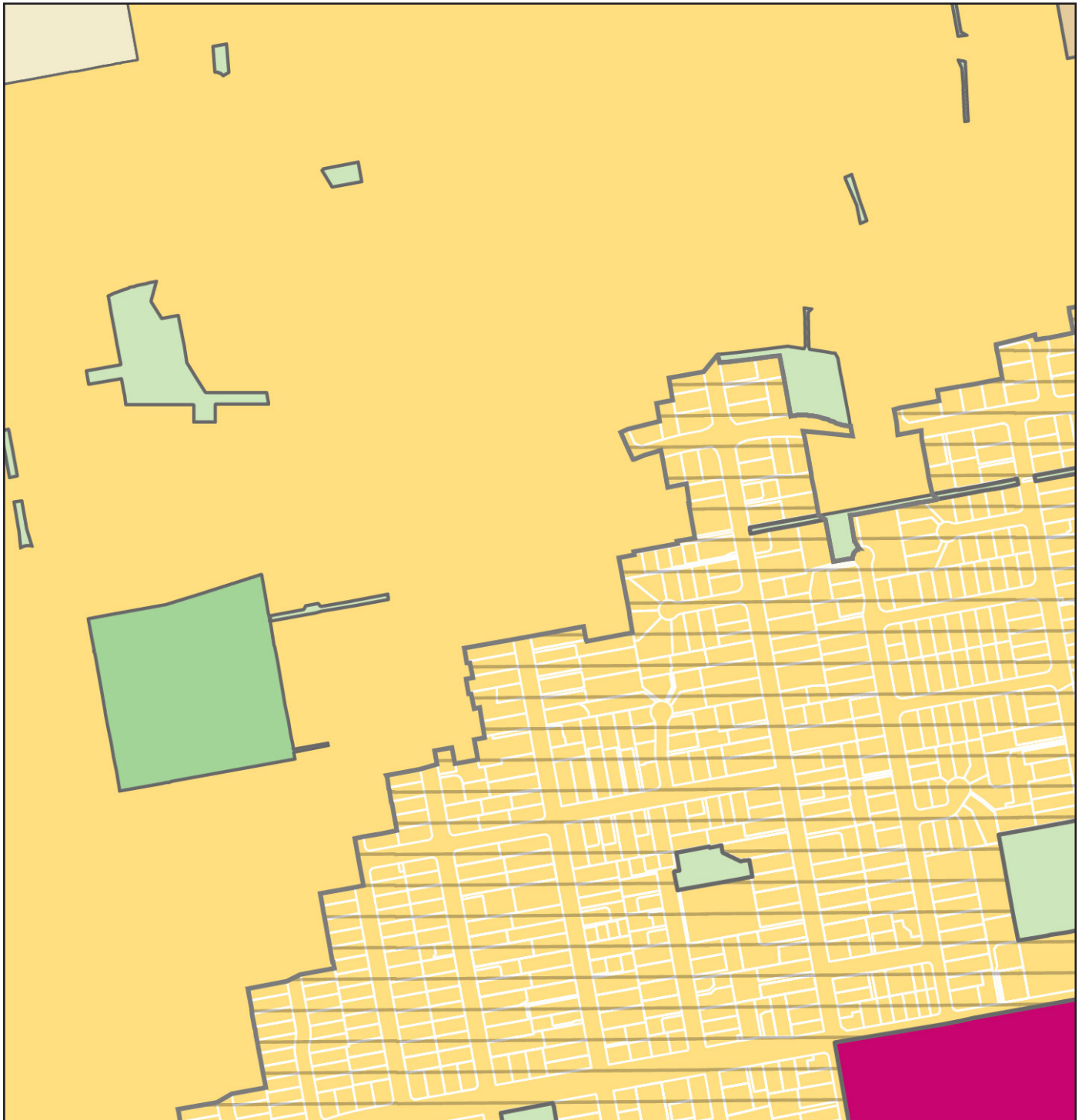
The following maps set out the amendments sought by Kāinga Ora to Variation 1 to allow for a Height Variation Control to be applied in the MRZ surrounding Rangiora Town Centre Zone.



Rangiora - Kāinga Ora Proposed Zones

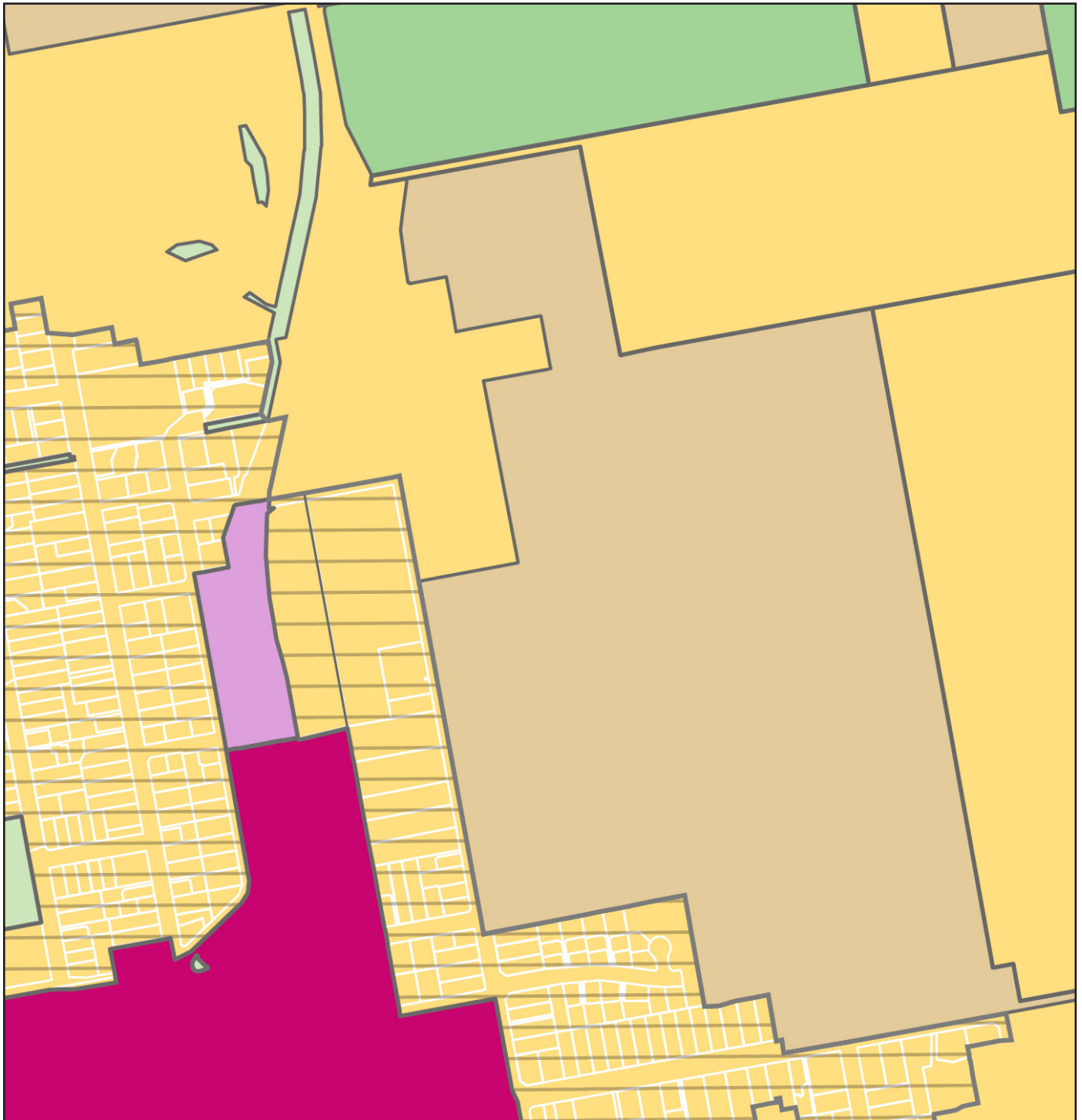


Rangiora - Kāinga Ora Proposed Zones

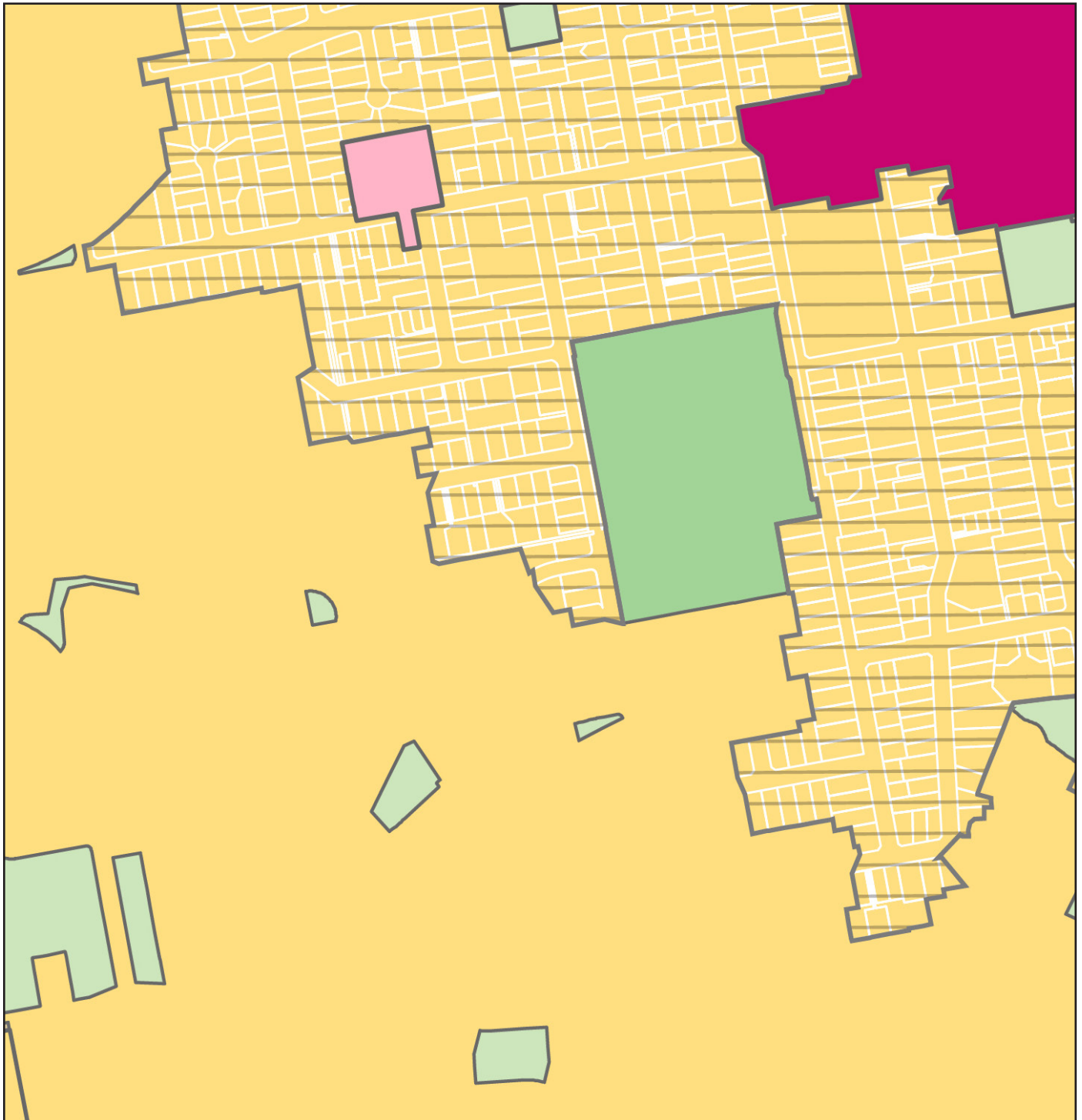


Kāinga Ora Proposed Zones	
	Height Variation Control
Residential Zones - Proposed	
	General Residential Zone (GRZ)
	Medium Density Residential Zone (MRZ)
	Large Lot Residential Zone (LLRZ)
	Settlement Zone (SETZ)
Open Space Zones	
	Natural Open Space Zone (NOSZ)
	Open Space Zone (OSZ)
	Sport and Active Recreation Zone (SARZ)
Industrial Zones	
	General Industrial Zone (GIZ)
	Heavy Industrial Zone (HIZ)
	Light Industrial Zone (LIZ)
Commercial Zones	
	Local Centre Zone (LCZ)
	Large Format Retail Zone (LFRZ)
	Mixed Use Zone (MUZ)
	Neighbourhood Centre Zone (NCZ)
	Town Centre Zone (TCZ)
Rural Zones	
	General Rural Zone (GRUZ)
	Rural Lifestyle Zone (RLZ)
Special Purpose Zones	
	Special Purpose Zone Hospital (SPZ HOS)
	Special Purpose Zone Kainga Nohoanga (SPZ KN)
	Special Purpose Zone Kaiapoi Regeneration (SPZ KR)
	Special Purpose Zone Museum and Conference Centre (SPZ MCC)
	Special Purpose Zone Pines Beach and Kairaiiki Regeneration (SPZ PBKR)
	Special Purpose Zone Pegasus Resort (SPZ PR)

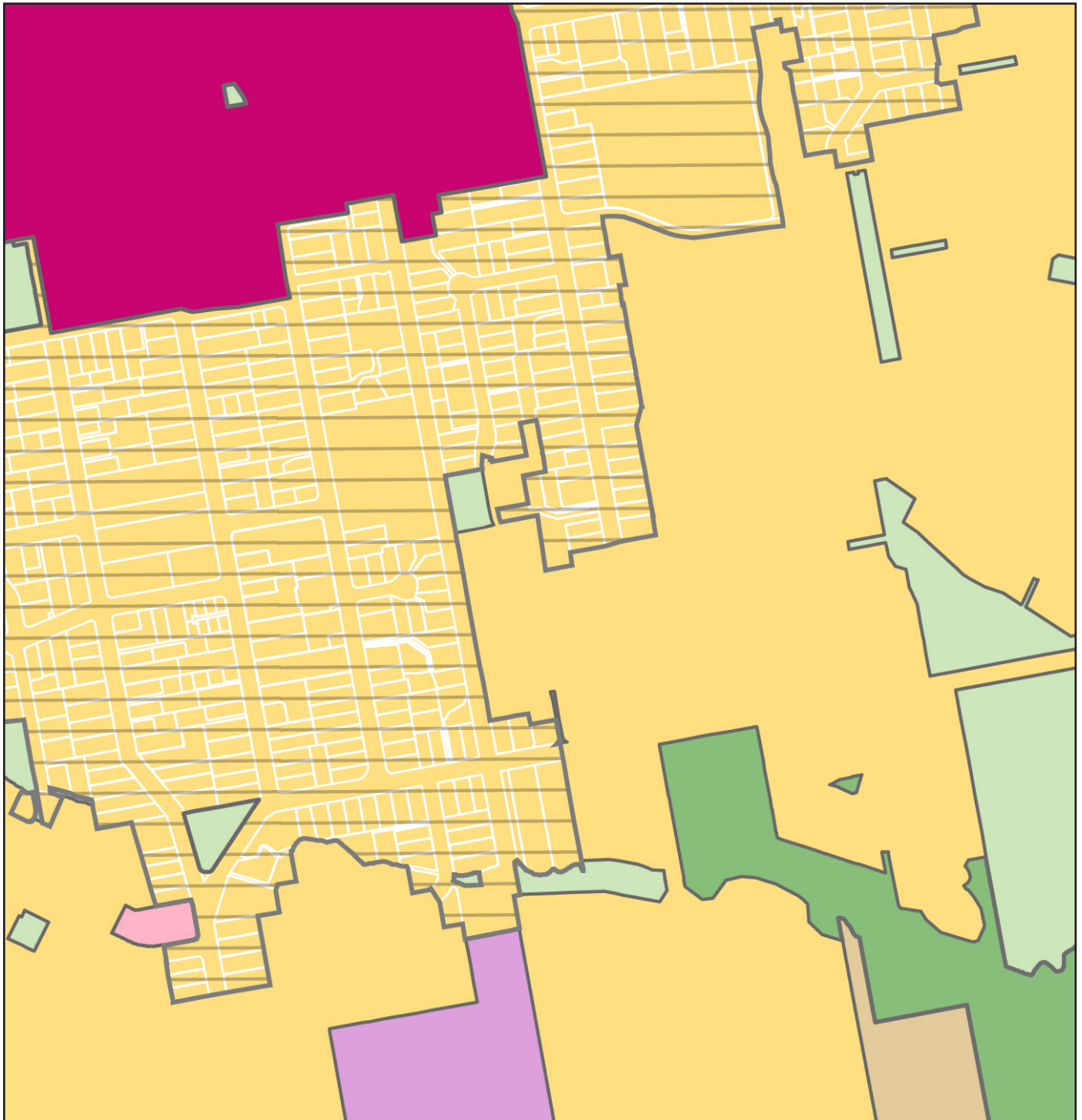
Rangiora - Kāinga Ora Proposed Zones - Map 1



Kāinga Ora Proposed Zones	
	Height Variation Control
Residential Zones - Proposed	
	General Residential Zone (GRZ)
	Medium Density Residential Zone (MRZ)
	Large Lot Residential Zone (LLRZ)
	Settlement Zone (SETZ)
Open Space Zones	
	Natural Open Space Zone (NOSZ)
	Open Space Zone (OSZ)
	Sport and Active Recreation Zone (SARZ)
Industrial Zones	
	General Industrial Zone (GIZ)
	Heavy Industrial Zone (HIZ)
	Light Industrial Zone (LIZ)
Commercial Zones	
	Local Centre Zone (LCZ)
	Large Format Retail Zone (LFRZ)
	Mixed Use Zone (MUZ)
	Neighbourhood Centre Zone (NCZ)
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