

Porirua's Proposed District Plan 2020

Submission on Porirua's Proposed District Plan

To - Environment and City Planning Team
Date received 20/11/2020
Submission Reference Number #72

Wishes to be heard? Yes
Is willing to present a joint case? Yes
Could gain an advantage in trade competition in making this submission? No
Directly affected by an effect of the subject matter of the submission? N/A

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Submission points

Point 72.1

Support / Support in part / Oppose

Support

Section: Definitions

Sub-section: Definitions

Provision

Ground level

means—

- a. the actual finished surface level of the ground after the most recent subdivision that created at least one additional allotment was completed (when the record of title is created)
- b. if the ground level cannot be identified under paragraph (a), the existing surface level of the ground
- c. if, in any case under paragraph (a) or (b), a retaining wall or retaining structure is located on the boundary, the level on the exterior surface of the retaining wall or retaining structure where it intersects the boundary.

NPS definition

Submission

Support NPS definition of ground level.

Relief sought

Retain NPS definition of ground level.

Point 72.2

Support / Support in part / Oppose

Support in part

Section: Definitions

Sub-section: Definitions

Provision

Earthworks

means the alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts.

NPS definition

Submission

The definition of 'earthworks' should provide an exclusion for trenching works involving the excavation of land to install foundation piles/posts, network pipes/cables and household connections to network pipes/cables with associated backfilling to original ground levels.

Relief sought

The definition of 'earthworks' should provide an exclusion for trenching works involving the excavation of land to install foundation piles/posts, network pipes/cables and household connections to network pipes/cables with associated backfilling to original ground levels.

Point 72.3

Support / Support in part / Oppose

Support in part

Section: SUB - Subdivision

Sub-section: Rules

Provision

SUB-R4

Subdivision of land around existing lawfully established buildings (excluding accessory buildings) or buildings (excluding accessory buildings) approved or part of a resource consent application and no vacant allotments are created

All zones

1. Activity status: **Controlled**

Where:

- a. Compliance is achieved or any existing or previously approved non-compliance is not increased with:
 - i. SUB-S2;
 - ii. SUB-S3;
 - iii. SUB-S4;
 - iv. SUB-S5;
 - v. SUB-S6; and
 - vi. SUB-S7;
- b. Where the site shares a boundary with, or contains, a river whose bed has an average width of 3m or more or adjoins MHWS, compliance is achieved with SUB-S8.

Matters of control are limited to:

1. The matters in SUB-P1;
2. The matters in SUB-P4; and
3. The matters in SUB-P5.

Submission

We presume that unit title subdivisions fall under this rule.

The minimum allotment size and shape standard SUB-S1 should not apply to unit title subdivisions

Relief sought

Clarify that Unit title subdivisions fall under this rule.

Add a provision that standard SUB-S1 does not apply to unit title subdivisions.

If not, a new rule for unit title subdivision is required.

Point 72.4

Support / Support in part / Oppose

Oppose

Section: Definitions

Sub-section: Definitions

Provision

Access area

means an access allotment or an area of land defined by a legal instrument providing or intended to provide access to a site or sites, but excludes any area of land that is wider than 6m and not legally encumbered to prevent the construction of buildings.

Submission

The threshold to exclude land that is wider than 6m is too high.

Relief sought

The threshold to exclude land so that it is no longer an access area should be 5m.

Point 72.5

Support / Support in part / Oppose

Support in part

Section: GRZ - General Residential Zone

Sub-section: Standards

Provision

1. All buildings and structures must be contained beneath a line of: Matters of discretion are restricted to:

- a. 55° measured into the site from any point 3m vertically above ground level along northern site boundaries; or
- b. 45° measured into the site from any point 3m vertically above ground level along site boundaries.

1. Visual dominance, shading and loss of privacy for adjacent residential sites;
2. Whether topographical or other site constraints make compliance with the standard impractical; and
3. Whether an increase in height in relation to boundary results from a response to natural hazard mitigation.

See GRZ-Figure 2 below to identify a northern boundary.

See GRZ-Figure 3 below which demonstrate how the height in relation to boundary is to be measured.

Except that:

- Where adjacent to a shared access in excess of 2.5m in width, the measurement shall be taken from the furthest side.
- For multi-unit housing residential units and retirement villages, the height in relation to boundary standard only applies at the external boundary of the site.
- For two or more residential units connected horizontally and/or vertically by a common wall or common floor, the height in relation to boundary standard only applies at the external boundary of the site. The height in relation to boundary standard requirement does not apply:
 - a. On any horizontal or vertical boundary between connected residential units; and
 - b. Any offset between the residential units that project not more than 2m beyond the common wall or common floor.

This standard does not apply to:

- A boundary with a road;
- Solar water heating components provided these do not exceed the height in relation to boundary by more than 500mm;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height in relation to boundary by more than 1m;
- Antennas, aerials, satellite dishes (less than 1m in diameter), flues, and architectural features (e.g. finials, spires) provided these do not exceed the height in relation to boundary by more than 3m measured vertically;
- Boundaries adjoining the City Centre Zone, Local Centre Zone, Hospital Zone, Neighbourhood Centre Zone, Mixed Use Zone, Large Format Retail Zone, General Industrial Zone and General Rural Zone; or
- A gable end, dormer or roof where that portion beyond the height in relation to boundary is no greater than 1.5m² in area and no greater than 1m in height.

Submission

Use of the word "line" in this context does not relate to the definition of line.

Relief sought

Remove hyperlink to definition of line.

Point 72.6

Support / Support in part / Oppose

Oppose

Section: Definitions

Sub-section: Definitions

Provision

Impervious surface

means a surface which prevents or significantly constrains the soakage or filtration of water into the ground. It includes:

- a. roofs;
- b. paved areas including driveways and sealed or compacted metal parking areas and patios;
- c. tennis or netball courts;
- d. sealed and compacted-metal roads; and
- e. engineered layers such as compacted clay.

It excludes:

- a. grass or bush areas;
- b. gardens and other landscaped areas;
- c. permeable paving and green roofs;
- d. permeable artificial surfaces, fields or lawns;
- e. slatted decks;
- f. swimming pools, ponds and dammed water; and
- g. rain tanks.

Submission

The use of the term 'paved' for an impervious surface, and also using the term 'permeable paving' as an exclusion is contradictory.

Compacted metal parking areas and road should not be included - as they are considered to be sufficiently permeable.

Relief sought

Provide more detail on what constitutes permeable paving - i.e. size of pavers and/or porosity for paver material.

Remove references to compacted metal road / parking areas.

Point 72.7

Support / Support in part / Oppose

Oppose

Section: Definitions

Sub-section: Definitions

Provision

Access allotment

means any separate allotment used primarily for access to a lot or lots having no legal frontage, but excludes any area of land that is wider than 6m and not legally encumbered to prevent the construction of buildings.

Submission

The threshold to exclude land that is wider than 6m is too high.

Relief sought

The threshold to exclude land so that it is no longer an access lot should be 5m.

Point 72.8

Support / Support in part / Oppose

Oppose

Section: Definitions

Sub-section: Definitions

Provision

Net site area

means the total area of the site, but excludes:

- a. any part of the site that provides legal access to another site;
- b. any part of a rear site that provides legal access to that site;
- c. any part of the site used for access to the site;
- d. any part of the site subject to a designation that may be taken or acquired under the Public Works Act 1981.

NPS definition

Submission

The exclusion of 'any part of the site used for access to the site' is extremely far reaching, as it would include all private driveways on a site.

Relief sought

Remove exclusion 'c'.

Point 72.9

Support / Support in part / Oppose

Support in part

Section: Definitions

Sub-section: Definitions

Provision

Minor earthworks

means earthworks for the installation and construction of service connections, effluent disposal systems, and interments in cemeteries or urupā.

Submission

Support installation of service connections as minor earthworks. Also include trenching for pipes/cables.

Relief sought

Also include trenching for pipes and cables.

Point 72.10

Support / Support in part / Oppose

Support in part

Section: SUB - Subdivision
Sub-section: Rules
Provision

SUB-R3 Subdivision that creates any vacant allotments

All zones

1. Activity status: **Controlled**

Where:

- a. Compliance is achieved with:
 - i. SUB-S1;
 - ii. SUB-S2;
 - iii. SUB-S3;
 - iv. SUB-S4;
 - v. SUB-S5;
 - vi. SUB-S6; and
 - vii. SUB-S7;
- b. Where the site shares a boundary with, or contains, a river whose bed has an average width of 3m or more or adjoins MHWS, compliance is achieved with SUB-S8.

Matters of control are limited to:

- 1. The matters in SUB-P1;
- 2. The matters in SUB-P4; and
- 3. The matters in SUB-P5.

Submission

We presume that unit title subdivisions do not fall under this rule.

Relief sought

Clarify that Unit title subdivisions do not fall under this rule and instead are to be assessed under SUB-R4.

Point 72.11

Support / Support in part / Oppose

Oppose

Section: SUB - Subdivision
Sub-section: All Zones Standards
Provision

SUB-Table 1 Minimum allotment size and shape

Zones	Minimum allotment size	Minimum allotment shape
General Rural Zone	All allotments created must have a minimum allotment size of 40ha.	n/a
Future Urban Zone		
Rural Lifestyle Zone	All allotments created must have a minimum	n/a

Settlement Zone	allotment size of 2ha. All allotments created must have a minimum allotment size of 3000m ² with a 1ha minimum average allotment size being achieved across the site.	n/a
Industrial Zone	All allotments created must have a minimum allotment size of 1,000m ² .	n/a
General Residential Zone and Māori Purpose Zone (Hongoeka)	All vacant allotments created must have a minimum allotment size of 400m ² .	All vacant allotments must be able to contain a rectangle measuring 10m x 15m clear of any yards, access allotments and right-of-way.
Medium Density Residential Zone	All vacant allotments created must have a minimum allotment size of 300m ² .	All vacant allotments must be able to contain a rectangle measuring 9m x 14m clear of any yards, access allotments and right-of-way.
Other zones	n/a	n/a
All zones	No minimum allotment size.	No minimum allotment shape.
All allotments created for infrastructure		

Submission

For General Residential Zone:

- Minimum lot size should be lowered to encourage a greater level of development to be consistent with the NPS-UD 2020. 400m² is a large area for single lots.
- Minimum shape factor should be reduced to encourage a greater level of development to be consistent with the NPS-UD 2020. 10m x 15m = 150m² which is a significantly large area for a house site.

For Medium Density Residential Zone:

- Minimum lot size should be lowered to encourage a greater level of development to be consistent with the NPS-UD 2020. 300m² is a large area for higher density lots.
- Minimum shape factor should be reduced to encourage a greater level of development to be consistent with the NPS-UD 2020. 9m x 14m = 126m² which is still a significantly large area for medium density housing.

Relief sought

For General Residential Zone:

- The minimum lot area should be 300m²;
- The minimum shape factor should be 8m x 12m.

For Medium Density Residential Zone:

- The minimum lot area should be 200m²;
- The minimum shape factor should be 8m x 10m.

Point 72.12

Support / Support in part / Oppose

Oppose

Section: TR - Transport

**Sub-section: Rules
Provision**

All zones

1. Access to a single site must have a direct legal road frontage width of at least 1.8m.

2. Access to two or more sites must have pedestrian and cycling access provided from legal road with a:
 - i. Minimum legal width of 1.8m;
 - ii. Minimum formed width of 1.5m;
 - iii. Maximum average gradient of 1:20; and
 - iv. Maximum gradient of 1:13 for any length as long as it does not exceed 9m.

Matters of discretion are restricted to:

1. The safe, efficient and effective functioning of the access, including the safety of pedestrians and cyclists;
2. Site and topographical constraints; and
3. The suitability of any alternative design options.

Submission

The requirement to provide pedestrian and cycling access for shared accesses is potentially more difficult to achieve than providing a driveway. That is, pedestrian/cycling access must have a max. gradient of 1:13 and ave. gradient of 1:20. Whereas a driveway can have a max. gradient of 1:5.

The ability for pedestrian access should allow for steps.

The formed and physical widths are wider than practically needed.

If a driveway is provided in compliance with TR_S2, is cycling access still required?

Relief sought

Delete the requirement for cycling access on shared accesses.

Allow for steps on pedestrian accesses.

Reduce minimum widths to (say) 1.2m formed width and 1.5m legal width.

Point 72.13

Support / Support in part / Oppose

Oppose

Section: SUB - Subdivision

Sub-section: Policies

Provision

Require infrastructure to be provided in an integrated and comprehensive manner by:

1. Ensuring infrastructure meets Council standards and has the capacity to accommodate the development or anticipated future development in accordance with the purpose of the zone, and is in place at the time of allotment creation;
2. Ensuring that subdivisions in Urban Zones, Settlement Zone and Māori Purpose Zone (Hongoeka) are hydraulically neutral;
3. Requiring reticulated wastewater, reticulated water and stormwater management systems in all Urban Zones to meet the performance criteria of the Wellington Water's Regional Water Standard May 2019;
4. Where reticulated services are not available, ensuring allotments are of a sufficient size and shape with appropriate soil conditions to accommodate on-site wastewater, stormwater and water supply infrastructure, and that there is sufficient water supply capacity for firefighting purposes; and
5. Ensuring telecommunications and power supply is provided to all allotments.

Submission

The policy is also used as an assessment criteria for rules when standards are not met. Therefore, the policy should not refer to meeting the same standards or performance criteria - as this simply creates a circular situation.

Relief sought

Amend policy as follows:

SUB-P5 Integration with infrastructure

Require infrastructure to be provided in an integrated and comprehensive manner by:

1. Ensuring infrastructure ~~meets Council standards and~~ has the capacity to accommodate the development or anticipated future development in accordance with the purpose of the zone, and is in place at the time of allotment creation;
2. Ensuring that subdivisions in Urban Zones, Settlement Zone and Maori Purpose Zone (Hongoeke) are hydraulically neutral;
3. Requiring reticulated wastewater, reticulated water and stormwater management systems in all Urban Zones to ~~meet the performance criteria of~~ **to be assessed against** the Wellington Water’s Regional Water Standard May 2019;
4. Where reticulated services are not available, ensuring allotments are of a sufficient size and shape with appropriate soil conditions to accommodate on-site wastewater, stormwater and water supply infrastructure, and that there is sufficient water supply capacity for firefighting purposes; and
5. Ensuring telecommunications and power supply is provided to all allotments.

Point 72.14

Support / Support in part / Oppose

Oppose

Section: TR - Transport

Sub-section: Rules

Provision

All zones

Any access to a site located in an area where no fully reticulated water supply system is available, or having a length greater than 75m when connected to a road that has a fully reticulated water supply system including hydrants, must:

- a. Be designed to achieve the vehicle access design standards in TR-Table 2 for:
 - i. The relevant vehicle access classification level in accordance with TR-S2 for activities with vehicle parking or loading spaces provided on-site; or
 - ii. Vehicle Access Level 1 for any other activities; and
- b. Have a minimum formed width of 3.5m;
- c. Have a height clearance of 4m; and
- d. Be designed to be free of obstacles that could hinder access for emergency service vehicles.

Matters of discretion are restricted to:

1. The safe, efficient and effective functioning of the vehicle access including firefighting access; and
2. Site and topographical constraints.

Submission

Why is Council trying to re-interpret the Building Code? Is there something wrong with the Building Code?

Fire related matters should be left to the Building Code and Building Act.

Our understanding of C/AS1 is that the 75m distance only applies to *multi-unit dwellings* (i.e. more than 2 units in a building).

There is no provision for an exception if the *multi-unit dwellings* are sprinklered.

What is the assessment process to obtain a resource consent when the standard is not complied with?

Should this standard apply to rural houses?

Relief sought

Delete standard TR-S4.

Point 72.15

Support / Support in part / Oppose

Oppose

Section: SUB - Subdivision

Sub-section: Policies

Provision

SUB-P4 Functioning of the transport network

Provide for subdivision where it maintains the safe and efficient functioning of the transport network by:

- 1. Ensuring roads and any vehicle access to sites meet minimum design standards to allow for safe and efficient traffic movements and can safely accommodate the intended number of users;
- 2. Where opportunities exist, including transport network connections within and between communities;
- 3. Where consistent with the zone, providing for a variety of travel modes that reflect the purpose, character and amenity values of the zone, including walking, cycling and access to public transport; and
- 4. Achieving safe and efficient access onto and from state highways.

Submission

Design of roads and vehicle access should either met a specified standard or may be subject to specific design by relevant experts.

Remove "meet minimum design standards to" as this causes confusion as there is no such thing as a minimum design standard.

Relief sought

Amend as follows:

SUB-P4 Functioning of the transport network

Provide for subdivision where it maintains the safe and efficient functioning of the transport network by:

- 1. Ensuring roads and any vehicle access to sites ~~meet minimum design standards~~ to allow for safe and efficient traffic movements and can safely accommodate the intended number of users;
- 2. Where opportunities exist, including transport network connections within and between communities;
- 3. Where consistent with the zone, providing for a variety of travel modes that reflect the purpose, character and amenity values of the zone, including walking, cycling and access to public transport; and
- 4. Achieving safe and efficient access onto and from state highways.

Point 72.16

Support / Support in part / Oppose

Oppose

Section: GRZ - General Residential Zone

Sub-section: Standards

Provision

1. Buildings and structures must not be located within a 4m setback from a boundary with a road except:

- a. On a site with two or more boundaries to a road, the building or structure must not be located within a 2m setback from the boundary with one road; and
- b. Where any garage and/or carport with a vehicle door or vehicle opening facing the road, it must not be located within a 5m setback from the boundary with the road.

This standard does not apply to:

- Fences and standalone walls — see GRZ-R4;
- Buildings and structures that are no more than 2m² in floor area and 2m in height above ground level; or
- Eaves up to a maximum of 600mm in width and external gutters or downpipes (including their brackets) up to an additional width of 150mm.

Matters of discretion are restricted to:

1. The streetscape and amenity of the area;
2. The design and siting of the building or structure;
3. Screening, planting and landscaping of the building or structure;
4. Pedestrian and cyclist safety (see TR-P3); and
5. Whether topographical or other site constraints that make compliance with the standard impractical.

Submission

The front yard setback of 4m is a significant distance and appears to encourage parking in the front yard.

Relief sought

Amend as follows:

GRZ-S4 Setback from boundary with a road

1. Buildings and structures must not be located within a ~~4m~~ **3m** setback from a boundary with a road except:

- a. On a site with two or more boundaries to a road, the building or structure must not be located within a 2m setback from the boundary with one road; and
- b. Where any garage and/or carport with a vehicle door or vehicle opening facing the road, it must not be located within a 5m setback from the boundary with the road.

This standard does not apply to:

- Fences and standalone walls — see [GRZ-R4](#);
- Buildings and structures that are no more than 2m² in floor area and 2m in height above ground level; or
- Eaves up to a maximum of 600mm in width and external gutters or downpipes (including their brackets) up to an

Matters of discretion are restricted to:

1. The streetscape and amenity of the area;
2. The design and siting of the building or structure;
3. Screening, planting and landscaping of the building or structure;
4. Pedestrian and cyclist safety (see [TR-P3](#)); and
5. Whether topographical or other site constraints that make compliance with the standard impractical.

Point 72.17

Support / Support in part / Oppose

Oppose

Section: EW - Earthworks

Sub-section: Rules

Provision

All zones 2. Activity status: **Restricted discretionary**

Where:

- a. Compliance is not achieved with EW-S1, EW-S2, EW-S3 or EW-S4.

Matters of discretion are restricted to:

- 1. The matters of discretion of any infringed standard.

Submission

The rule should also include non-compliance with EW-S5.

The rule should include non-notification provisions.

Relief sought

Include EW-S5 as a matter of non-compliance.

Add non-notification provisions.

Point 72.18

Support / Support in part / Oppose

Oppose

Section: THWT - Three Waters

Sub-section: Standards

Provision

Residential Zones 1. Any rainwater tank must be sized in accordance with the minimum requirements in THWT-Table 1: Matters of discretion are restricted to:

Māori Purpose Zone (Hongoeka)

Settlement Zone

- a. Where the roof area of the building is between 40m² and 99.9m² – a 2000L capacity rainwater tank.
- b. Building roof area of ≥ 100m² - < 200m² – 3000L capacity rainwater tank.
- c. Building roof area ≥ 200m² –5000L capacity rainwater tank.

- 1. Any potential impacts on any downstream flooding hazard;
- 2. The size and scale of the development and the additional stormwater that the proposal will generate compared to the existing situation;
- 3. The capacity of the local stormwater network; and
- 4. Whether there are any site-specific

constraints or opportunities within the local area that mean that hydraulic neutrality is not required.

2. The tank must meet the specifications, and be installed in accordance with Acceptable Solution #1 from the Wellington Water guide Managing Stormwater Runoff, The use of rain tanks for hydraulic neutrality, Acceptable solution #1 dated June 2019

Submission

Stormwater neutrality should only be required to a 10% AEP event.

There are other means of achieving stormwater neutrality compared to rainwater tanks.

Relief sought

Amend to require stormwater neutrality to a 10% AEP event.

Provide for other mechanisms to achieve stormwater neutrality - by specific design.

Point 72.19

Support / Support in part / Oppose

Oppose

Section: EW - Earthworks

Sub-section: Standards

Provision

All zones

1. All silt and sediment must be retained on the site.

2. Silt and sediment devices must be installed in accordance with APP15 - Silt and Sediment Devices prior to the commencement of earthworks and must be retained for the duration of the earthworks.

This standard does not apply to the transport of cut and fill material.

Matters of discretion are restricted to:

- 1. The retention of silt and sediment on the site.

Submission

It is impossible to retain all silt and sediment on the site during all rainfall events.

Relief sought

Delete item 1 in EW-S5

Point 72.20

Support / Support in part / Oppose

Oppose

Section: INF - Infrastructure

Sub-section: Policies

Provision

Classification		Access Road		Collector Road	
Classification criteria (must meet all criteria)	Typical daily traffic (annual average daily traffic movements)	1-1,000		1,000-5,000	
	Heavy commercial vehicles (annual average daily traffic movements)	1-25		25-300	
	Buses (urban peak)	0		1-15 buses; or 1-750 people per hour	
Zone	Urban Zones	General Rural Zone, Rural Lifestyle Zone, Settlement Zone, Open Space Zone, Māori Purpose Zone (Hongoeke) and Special Purpose Zone (BRANZ)	All zones except General Rural Zone and Rural Lifestyle Zone	General Rural Zone and Rural Lifestyle Zone	
Design speed (km/h)	40	40	50	80	
Maximum gradient	10% or 12.5% for maximum 85m in any one length	10% or 12.5% for maximum 85m in any one length	10% or 12.5% for maximum 85m in any one length	10% or 12.5% for maximum 85m in any one length	
Minimum width (m)	Parking	1 x 2.5	-	2 x 2.5	2 x 2.5
	Traffic (must provide unhindered vehicle access)	2 x 3.0	2 x 3.0	2 x 3.0	2 x 3.0
	Cycles	2 x 1.5	2 x 1.5	2 x 1.5	1 x 3.0
	Footpath	2 x 1.5	2 x 1.5	2 x 2.0	-
	Infrastructure berm	1.0	1.0	1.0	1.0
	Street tree berm	3.0	-	3.0	-
	Legal width	21.0	21.0	23.0	23.0
Number of street trees	As per INF-Table 2	-	As per INF-Table 2	-	

Submission

The minimum roading widths are huge. This seems contrary to national and NZTA direction to create narrower roads with lower speed environments using shared spaces.

Relief sought

Road design should be as per NZS 4404:2010.

Point 72.21

Support in part

Section: THWT - Three Waters

Sub-section: Policies

Provision

Enable new development in the Urban Zones, Settlement Zone and the Māori Purpose Zone (Hongoeka) where it achieves hydraulic neutrality.

Submission

Hydraulic neutrality should only be mandatory for a 10 year event (10% AEP).

Relief sought

Amend as follows:

THWT-P1 Hydraulic Neutrality in Urban Zones, [Settlement Zone](#) and the [Maori Purpose Zone \(Hongoeka\)](#)

Enable new development in the Urban Zones, [Settlement Zone](#) and the [Maori Purpose Zone \(Hongoeka\)](#) where it achieves hydraulic neutrality *for up to a 10% AEP event*.

Point 72.24

Support / Support in part / Oppose

Oppose

Section: THWT - Three Waters

Sub-section: Rules

Provision

THWT-R3 Water metering device for new buildings connected to the reticulated water systems

Residential Zones	1. Activity status: Permitted
Commercial and Mixed Use Zones	Where: <ul style="list-style-type: none"> a. All new buildings that are connected to the reticulated water network must be fitted with a water metering device that meets the requirements of Sections 6.4.10.2 and Section 6.4.11 of the Wellington Water Regional Standard for Water Services May 2019.
General Industrial Zone	
Hospital Zone	
Māori Purpose Zone (Hongoeka)	
Settlement Zone	

Submission

As per our submission SUB-S4, this appears to be a backdoor way of introducing a water metering policy.

Relief sought

Delete the rule

Point 72.25

Support / Support in part / Oppose

Support in part

Section: GRZ - General Residential Zone

Sub-section: Rules

Provision

GRZ-R18 Multi-unit housing

1. Activity status: **Restricted discretionary**

Matters of discretion are restricted to:

- 1. The matters in GRZ-P5.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.

Submission

The rule should include a non-notification provision for limited notification under s95B where the multi-unit housing proposal complies with standards GRZ-S1 to GRZ-S8 (except compliance is not required with GRZ-S6).

Relief sought

Add a non-notification provision for precluding limited notification that applies where the multi-unit housing proposal complies with standards GRZ-S1 to GRZ-S8 (except compliance is not required with GRZ-S6).

Point 72.26

Support / Support in part / Oppose

Oppose

Section: THWT - Three Waters

Sub-section: Standards

Provision

THWT-S2 Hydraulic neutrality

Commercial and Mixed Use Zones

1. A hydraulic neutrality device must be installed, which must be:

- a. Designed and built in accordance with the design parameters in Section 4.4.3.3 of the

Matters of discretion are restricted to:

- 1. The access and on-going maintenance of the hydraulic neutrality devices;
- 2. Any potential impacts on any downstream

General Industrial Zone

Wellington Water Regional Standard for Water Services May 2019; and
 b. Fully operational prior to the use of the impervious area.

Hospital Zone

- flooding hazard;
3. The size and scale of the development and the additional stormwater that the proposal will generate compared to the existing situation;
 4. The preference for one central hydraulic neutrality device over numerous individual hydraulic neutrality devices;
 5. The capacity of the local stormwater network; and
 6. Whether there are any site-specific constraints or opportunities within the local area that mean that hydraulic neutrality is not required.

Submission

There is no section 4.4.3.3 in the RSWS 2019??

Hydraulic neutrality should only be required for up to the 1% AEP event.

Relief sought

Delete or amend

Point 72.27

Support / Support in part / Oppose

Support

Section: THWT - Three Waters

Sub-section: Rules

Provision

THWT-R2	Increases in the impervious surface area of a site
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Commercial and Mixed Use Zones	1. Activity status: Permitted
General Industrial Zone	Where: a. Compliance is achieved with THWT-S2.
Hospital Zone	

Submission

We support that the rule does not apply to residential zones

Relief sought

Maintain rule so that it does not apply to residential zones.

Point 72.28

Support / Support in part / Oppose

Support in part

Section: THWT - Three Waters

Sub-section: Objectives

Provision

Use and development within Urban Zones, and the areas of the Settlement Zone and Māori Purpose Zone (Hongoeka) serviced by all or part of the Three Waters Network, have sufficient Three Waters Network capacity to accommodate the resulting demand.

Submission

This objective needs to be work in association with the development contributions policy. That is, if the development contributions policy anticipates new/upgraded services, then this objective must anticipate the outcome of the development contributions policy.

Relief sought

Confirm that this objective acknowledge and includes the outcomes of the development contributions policy.

Point 72.29

Support / Support in part / Oppose

Support in part

Section: THWT - Three Waters

Sub-section: Rules

Provision

THWT-R1	Rainwater tanks for new buildings (excluding residential accessory buildings)
Residential Zones	2. Activity status: Restricted discretionary
Māori Purpose Zone (Hongoeka)	Where: <ul style="list-style-type: none"> a. Compliance is not achieved with THWT-R1-a.
Settlement Zone	Matters of discretion are restricted to: <ul style="list-style-type: none"> 1. The matters of discretion in THWT-S1.

Submission

This rule should be subject to non-notification provisions.

Relief sought

Amend rule to include non-notification provisions.

Point 72.30

Support / Support in part / Oppose

Oppose

Section: SUB - Subdivision
Sub-section: All Zones Standards
Provision

SUB-S6	Stormwater management
All zones	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>1. Where a connection to Council’s stormwater management systems is available, all new allotments must be provided with a connection at the allotment boundary, that provides the level of service in Chapter 4 Stormwater Table 4.1, Table 4.2 and 4.3 of the Wellington Water Regional Standard for Water Services May 2019.</p> <p>2. All subdivisions within Urban Zones and the Māori Purpose Zone (Hongoeka) must achieve hydraulic neutrality.</p> <p>3. Where a connection to Council’s stormwater systems is not available and the means of stormwater disposal is to ground, that area must not be subject to instability or inundation or be used for the disposal of wastewater.</p> </div> <div style="width: 45%;"> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. For Urban Zones and the areas of the Settlement Zone and Māori Purpose Zone (Hongoeka) serviced by all or part of the three waters network: <ol style="list-style-type: none"> a. The matters in THWT-S2; and b. The matters in THWT-P3; 2. For sites that are not within Urban Zones and the areas of the Settlement Zone and Māori Purpose Zone (Hongoeka) serviced by all or part of the three waters network: <ol style="list-style-type: none"> a. Any potential impacts on any downstream flooding hazard from the proposed stormwater disposal from the site; and b. The size and scale of the development and the additional stormwater that the proposal will generate compared to the existing situation. </div> </div>

Submission

Hydraulic neutrality should only be mandatory for a 10 year event (10% AEP).

Relief sought

Amend as follows:

SUB-S6	Stormwater management
All zones	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>1. Where a connection to Council’s stormwater management systems is available, all new allotments must be provided with a connection at the allotment boundary, that provides the level of service in Chapter 4 Stormwater Table 4.1, Table 4.2 and 4.3 of the Wellington Water Regional Standard for Water Services May 2019.</p> <p>2. All subdivisions within Urban Zones and the Maori Purpose Zone (Hongoeka) must achieve hydraulic neutrality <u>for rain events up to 10% AEP event.</u></p> </div> <div style="width: 45%;"> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. For Urban Zones and the areas of the Settlement Zone and Maori Purpose Zone (Hongoeka) serviced by all or part of the three waters network: <ol style="list-style-type: none"> a. The matters in THWT-S2; and b. The matters in THWT-P3; 2. For sites that are not within Urban Zones and the areas of the Settlement Zone and Maori Purpose Zone (Hongoeka) serviced by all or part of the three waters network: <ol style="list-style-type: none"> a. Any potential impacts on any downstream flooding hazard from the proposed stormwater disposal from the site; and </div> </div>

3. Where a connection to Council's stormwater systems is not available and the means of stormwater disposal is to ground, that area must not be subject to instability or inundation or be used for the disposal of wastewater.

b. The size and scale of the development and the additional stormwater that the proposal will generate compared to the existing situation.

Point 72.31

Support / Support in part / Oppose

Oppose

Section: SUB - Subdivision

Sub-section: All Zones Standards
Provision

All zones

1. All new allotments must have provision for fibre optic cable connections to the legal boundary of the allotments.

2. All new allotments must have provision for electricity connections to the legal boundary of the allotments.

Matters of discretion are restricted to:

1. Alternative provision of telecommunication and power supply.

Submission

With the introduction of 5G technologies, cable networks for telecommunications are no longer necessary.

Relief sought

Delete item 1 of standard SUB-S7.

Point 72.32

Support / Support in part / Oppose

Oppose

Section: SUB - Subdivision

Sub-section: All Zones Standards

Provision

SUB-S4

Water supply

All zones

1. Where a connection to Council's reticulated water supply systems is available, all new allotments must:
 - a. Be provided with a water supply connection at the allotment boundary, that provides the level of service in Chapter 6, Tables 6.1 and 6.2 of the Wellington Water Regional Standard for Water Services May 2019;
 - b. Comply with water supply requirements in the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008; and

Matters of discretion are restricted to:

1. For Urban Zones and the areas of the Settlement Zone and Māori Purpose Zone (Hongoeka) serviced by all or part of the three waters network:
 - a. The matters in THWT-P2;
 - b. The matters in THWT-P3.
2. For sites that are not within Urban Zones and the areas of the Settlement Zone and Māori Purpose Zone (Hongoeka) serviced by all or part of the three waters network:
 - a. The provision of an alternative water

- c. Be fitted with a water metering device that meets the requirements of Sections 6.4.10.2 and Section 6.4.11 of the Wellington Water Regional Standard for Water Services May 2019.
2. Where a connection to Council's reticulated water supply systems is not available, all allotments must:
- a. Be provided with access to a self-sufficient potable water supply with a minimum volume of 10,000L; and
 - b. Comply with the water supply requirements of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.

- supply;
- b. The potability of the alternative water supply;
- c. Measures to maintain the health and safety of users of the water;
- d. The ability for the proposal to provide for fire safety; and
- e. Any mitigation measures to reduce the impact of the demand from the subdivision on the water network.

Submission

Why is Council introducing a water metering policy via the District Plan?

Water metering policy should be consulted and considered under the local government act procedures.

This seems to be a back door way of introducing a water metering policy.

Relief sought

Delete item c of standard SUB-S4.

Point 72.33

Support / Support in part / Oppose

Oppose

Section: SUB - Subdivision

Sub-section: All Zones Standards

Provision

SUB-S2	Access
All zones	<p>1. All new allotments created must have legal and physical access to a road in accordance with TR-S1 - TR-S4.</p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. The safe, efficient and effective functioning of any private way, including firefighting access and the safety of pedestrians and cyclists; 2. The suitability of any alternative design options. 3. The safe, efficient and effective functioning of the transport network; and 4. Site and topographical constraints.

Submission

As on-site parking is not required under the NPS-UD 2020, therefore standard TR-S3 is not relevant.

Standard TR-S4 is only relevant in particular circumstances.

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Relief sought

Deleted reference to standards TR-S3.

Standard TR-S4 only to apply as/if relevant.