

ref: Bruwer/-

## SUBMISSION BY PAREMATA BUSINESS PARK LTD ON THE PROPOSED DISTRICT PLAN TO THE PORIRUA CITY COUNCIL DISTRICT PLAN

20 November 2020

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TO: Porirua City Council  
PO Box 50-218  
PORIRUA CITY

BY EMAIL: [dpreview@porirucity.govt.nz](mailto:dpreview@porirucity.govt.nz)

FROM: Cuttriss Consultants Limited  
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# Cuttriss

Surveyors. Engineers. Planners.

## 1. INTRODUCTION

- 1.1 Paremata Business Park Ltd (the Submitter) (referred to as “Paremata Business Park”) Owned by Tony Bauman who is developer and builder in Wellington for the last 30 years.
- 1.2 The submitter owns a number of properties in the Porirua District. These are:
- Lot 2 DP 90963 5 Paremata Crescent, Paremata, Porirua
  - Lot 1 DP 90963 7 Paremata Crescent, Paremata, Porirua
  - Lot 7 DP 3494 15 Paremata Crescent, Paremata, Porirua (confirmed contract but not yet settled.
  - Lot 8 DP 3494 17 Paremata Crescent, Paremata, Porirua



**Figure 1: Sites in Paremata owned by 1.1 Paremata Business Park Ltd**

- 1.3 In general, Paremata Business Park support the direction and intention the Porirua Proposed District Plan. However, Paremata Business Park Ltd is seeking some amendments and these are set out in the online submission.
- 1.4 Paremata Business Park Ltd wishes to be heard in support of this submission.
- 1.5 If others make a similar submission, Paremata Business Park Ltd would be prepared to consider presenting a joint case at any hearing.
- 1.6 Paremata Business Park Ltd could not gain any advantage in trade competition through this submission.
- 1.7 Paremata Business Park Ltd is directly affected by an effect of the subject matter of this submission that;
- Adversely affects the environment; and
  - Does not relate to trade competition or the effects of trade competition.

Your sincerely

Linda Bruwer  
**Senior Planner**

# Porirua's Proposed District Plan 2020

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## Submission on Porirua's Proposed District Plan

To - Environment and City Planning Team

Date received 20/11/2020

Submission Reference Number #69

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? Yes

### Address for service:

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## Submission points

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### Point 69.1

#### Support / Support in part / Oppose

Support in part

Section: CE - Coastal Environment

Sub-section: Policies

Provision

#### CE-P14 Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities in the High Hazard Areas

Avoid the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities in the High Hazard Areas of the Coastal Hazard Overlays unless it can be demonstrated that:

1. The activity has a critical operational need to locate within the High Hazard Area and locating outside the High Hazard Area is not a practicable option;
2. The activity incorporates mitigation measures that demonstrate that risk to people's life and wellbeing, property damage and the environment is avoided, and people can evacuate safely during a natural hazard event; and
3. The risk to the activity and surrounding properties is either avoided or is low due to site specific factors, and/or the scale, location and design of the activity.

### Submission

The policy is too restrictive and does not allow high risk activities that can prove that risk is mitigated and/or avoided. For example should a medium density residential development be proposed in the coastal inundation area, but it is clearly shown that mitigation measures are implemented that will take risk away from all residents the proposal will not meet point one of the policy.

supported.

**Relief sought****CE-P14 Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities in the High Hazard Areas**

Avoid the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities in the High Hazard Areas of the Coastal Hazard Overlays unless it can be demonstrated that:

1. The activity has a critical operational need to locate within the High Hazard Area and locating outside the High Hazard Area is not a practicable option; or
2. The activity includes mitigation and avoidance measures as follows:
  - The activity incorporates mitigation measures that demonstrate that risk to people's life and wellbeing, property damage and the environment is avoided, and people can evacuate safely during a natural hazard event; and
  - The risk to the activity and surrounding properties is either avoided or is low due to site specific factors, and/or the scale, location and design of the activity.

Or adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission

**Point 69.2****Support / Support in part / Oppose**

Support in part

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** Objective

**Provision****MRZ-O2 Character and amenity values of the Medium Density Residential Zone**

The scale, form and density of use and development in the Medium Density Residential Zone is characterised by:

1. A built form of predominantly two and three-storey buildings, surrounded by open space;
2. A greater intensity of buildings than anticipated in the General Residential Zone;
3. Good quality on-site residential amenity;
4. Good quality amenity for adjoining sites; and
5. An urban environment that is visually attractive, safe, easy to navigate and convenient to access.

**Submission**

Point 1 can be interpreted as too narrow in terms of the provision of open space.

**Relief sought****MRZ-O2 Character and amenity values of the Medium Density Residential Zone**

The scale, form and density of use and development in the Medium Density Residential Zone is characterised by:

1. A built form of predominantly two and three-storey buildings, with the provision of/or within walkable proximity of accessible surrounded by open space;
2. A greater intensity of buildings than anticipated in the General Residential Zone;

3. Good quality on-site residential amenity;
4. Good quality amenity for adjoining sites; and
5. An urban environment that is visually attractive, safe, easy to navigate and convenient to access.

Or adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission

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**Point 69.3**

**Support / Support in part / Oppose**

Support in part

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** Policies

**Provision**

MRZ-P9 On-site and off-site residential amenity

Ensure buildings and structures achieve good quality on-site and off-site residential amenity by requiring:

1. Separation from site boundaries and heights in respect to site boundaries, that safeguard on-site and off-site privacy, minimise visual dominance to adjacent sites, and ensure adequate access to sunlight and daylight; and
2. Appropriate levels of useable outdoor amenity space for residential units, that have access to sunlight and can readily accommodate outdoor activities.

**Submission**

This Policy should not be unit focused but human-focused. Units should be of varying size and as such will have different outdoor requirements. Communal outdoor space should also be a more prominent solution.

**Relief sought**

MRZ-P9 On-site and off-site residential amenity

Ensure buildings and structures achieve good quality on-site and off-site residential amenity by requiring:

1. Separation from site boundaries and heights in respect to site boundaries, that safeguard on-site and off-site privacy, minimise visual dominance to adjacent sites, and ensure adequate access to sunlight and daylight; and
2. Appropriate levels of useable quality outdoor amenity space for residential units and/or residents, that have access to sunlight and can readily accommodate outdoor activities.

Or adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission

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**Point 69.4**

**Support / Support in part / Oppose**

Support in part

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** Policies

**Provision**

MRZ-P9 On-site and off-site residential amenity

Ensure buildings and structures achieve good quality on-site and off-site residential amenity by requiring:

1. Separation from site boundaries and heights in respect to site boundaries, that safeguard on-site and off-site privacy, minimise visual dominance to adjacent sites, and ensure adequate access to sunlight and daylight; and
2. Appropriate levels of useable outdoor amenity space for residential units, that have access to sunlight and can readily accommodate outdoor activities.

**Submission**

Should not be unit focused but human-focused. Units should be of varying size and as such will have different outdoor requirements. Communal outdoor space should also be a more prominent solution.

**Relief sought**

**MRZ-P9 On-site and off-site residential amenity**

Ensure buildings and structures achieve good quality on-site and off-site residential amenity by requiring:

1. Separation from site boundaries and heights in respect to site boundaries, that safeguard on-site and off-site privacy, minimise visual dominance to adjacent sites, and ensure adequate access to sunlight and daylight; and
2. Appropriate levels of useable quality outdoor amenity space for residential units and/or residents, that have access to sunlight and can readily accommodate outdoor activities.

Or adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission

**Point 69.5**

**Support / Support in part / Oppose**

Amend

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** Standards

**Provision**

**MRZ-S1 Height**

1. All buildings and structures must not exceed a maximum height above ground level of:

- a. 11m; or
- b. 15m in the Eastern Porirua Residential Intensification Precinct.

Except that:

- a. An additional 1m can be added to the maximum height of any building with a roof pitch of between 15° and 45°, which rises to a ridge that is centred or within the middle third of the building footprint, as illustrated in MRZ-Figure 1 below.

This standard does not apply to:

- Solar water heating components provided these do not

Matters of discretion are restricted to:

1. The location, design and appearance of the building or structure;
2. Any adverse effects on the streetscape;
3. Visual dominance, shading and loss of privacy for adjacent residential sites;
4. Compatibility with the anticipated scale, proportion and context of buildings and activities in the surrounding area;
5. Retention of established landscaping;
6. Whether an increase in building or structure height results from a response to natural hazard mitigation; and
7. Whether topographical or other site constraints make compliance with the standard impractical.

exceed the height by more than 500mm;

- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m; or
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.
- Lift overruns provided these do not exceed the height by more than 1m.

### Submission

This height restriction is not aligned with the NPS-UD. The height would therefore need to be either increased, a new zone is created or specific overlay provisions need to be created.

### Relief sought

Adopt any other such relief, including additions, deletions, or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission that will enable the objectives and policies of the NPS-UD.

### Point 69.6

#### Support / Support in part / Oppose

Support in part

**Section:** Planning Maps

**Sub-section:** General

**Provision**

General

### Submission

In general, we support the direction and intention the Porirua Proposed District Plan is taking. However, we are seeking some amendments, and these are set out further below.

We would like Council to adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in these submissions, as necessary to give effect to this submission.

As Porirua is classified as a tier 1 urban environment, we support the incorporation of the outcomes of the National Policy Statement on Urban Development (NPS-UD) and that these matters be included in the Proposed District Plan. All the NPS-UD objectives and policies of particular importance is the following

*Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:*

*in city centre zones, building heights and density of urban form to realise as much*

*development capacity as possible, to maximise benefits of intensification; and*

*in metropolitan centre zones, building heights and density of urban form to reflect*

*demand for housing and business use in those locations, and in all cases building*

*heights of at least 6 storeys; and*

*building heights of least 6 storeys within at least a walkable catchment of the following:*

(i) existing and planned rapid transit stops

(ii) the edge of city centre zones

(iii) the edge of metropolitan centre zones; and

in all other locations in the tier 1 urban environment, building heights and density

of urban form commensurate with the greater of:

(i) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or

(ii) relative demand for housing and business use in that location.

Paremata Business request that this is implemented for all areas in the Porirua District that is “walkable” from stations.

We propose that this can be implemented in the following three options:

Option 1: Create a new medium density zone and mixed-use zone with associated objectives, policies, rules and standards that address the areas as set out in Policy 3 of the NPS-UD. This approach is supported as the existing medium density zone provisions are too limiting to address development up to six stories.

Option 2: Create an overlay over the existing zone areas allowing for the facilitation of higher densities.

Option 3: Amend the existing medium density zone provisions to allow for higher density developments.

We are not setting out the full details of Option 1, 2 or 3 except for showing how the zone change would look in terms of the Proposed District Plan maps around the Paremata Station.

### **Relief sought**

Incorporate the requirements of the NPS-UD into the Proposed District Plan in terms of objectives and policies, rules and standards in all areas around railway stations in the Porirua District.

This can be accomplished by the following three options or any other means that will result in the same outcome.

Option 1: Create a new medium density zone and mixed-use zone with associated objectives, policies, rules and standards that address the areas as set out in Policy 3 of the NPS-UD. This approach is supported as the existing medium density zone provisions are too limiting to address development up to six stories

Option 2: Create an overlay over the existing zone areas allowing for the facilitation of higher densities.

Option 3: Amend the existing medium density zone provisions to allow for higher density developments. An indication of what key standards will require amendment is indicated in sections 5 and 6 below.

Adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in these submissions, as necessary to give effect to this submission.

### **Attachments**

PAREMATA BUSINESS PARK RELIEF SOUGHT - NPSUD Zone Changes.docx

### **Point 69.7**

#### **Support / Support in part / Oppose**

Support in part

**Section:** Planning Maps



**Sub-section:** General

**Provision**

General

**Submission**

Notwithstanding the implementation of the NPS-UD, and should Council not be in a position to implement the NPS-UD at this stage, Paremata Business Park has some concerns with the proposed zoning around their existing properties.

The proposed Local Centre Zone over the sites is restricted only to the existing commercial land uses. This seems to be overly conservative and limits the extension of commercial development that could better serve the local area. There is also no provision for medium density in this area except for on floor levels above the limited commercial land proposed to be zoned local centre zone.

The report prepared by McIndoe URBAN<sup>[1]</sup> Indicates that Parameta was not selected for medium-density due to the following reasons:

*Paremata is not recommended for medium density intensification because of a combination of:*

- *steep, broken topography, including some large areas of south facing steep slopes;*
- *distance from sports fields, recreation and playgrounds;*
- *separation from Draft Local Commercial Zones, with distance of less than 800m but a convoluted route and significant contour difference between the draft LCZ and the elevated areas served; and*
- *absence of local community facilities*

We are not in support of these conclusions because of the following:

- Steep terrain does not prevent itself from being developed into medium density. Yes, we acknowledge that it is more costly, but there are examples all over the world where steep hill side areas have been developed successfully into medium density housing areas such as some neighbourhood in San Francisco and Italy. The price point for dwellings in this area is only going up, making development of more challenging sites more viable.
- Taller buildings can take advantage of sloping topography negating potential shading on adjoining properties where slope conditions are favourable such as the submitters sites in Paremata.
- The area is close to (within a 10-minute walk) a variety of parks/beaches to both the south and the north of the area.
  - The park at 6 Cassley Crescent, Papakowhai, Porirua
  - Dolly Varden Reserve and beach – yes slightly convoluted way to get there, but with higher densities and increased taxes due to higher intensity land uses, pedestrian ways and cycle ways can more easily be improved.
- The Local Commercial Zones are proposed for the submitters site thus allowing for better commercial servicing of the area.
- There is a primary school with existing sport/play fields right there.

We request a zone change to ensure greater supply of business land and housing supply, optimising the location next to Paremata Station.

We are proposing two options for this change:

Option 1: Change the General Residential Zone to the east of the Paremata Business Park properties to Medium Density Residential

Option 2: Change the General Residential Zone to the east of the Paremata Business Park properties to extend the Local Centre Zone.

<sup>[1]</sup> McIndoe URBAN Porirua City Council Mapping Analysis 9 July 2019, p9

**Relief sought**

Change the zoning map around the properties situated at 5-17 Paremata Crescent as follows:

Option 1: Change the General Residential Zone to the east of the Paremata Business Park properties to Medium Density

Residential Zone.

or

Option 2: Change the General Residential Zone to the east of the Paremata Business Park properties to extend the Local Centre Zone.

Adopt any other such relief, including additions, deletions, or consequential amendments necessary as a result of the matters raised in these submissions, as necessary to give effect to this submission.

**Attachments**

PAREMATA BUSINESS PARK RELIEF SOUGHT - General zone changes.docx

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**Point 69.8**

**Support / Support in part / Oppose**

Support in part

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** Standards

**Provision**

MRZ-S2      Height in relation to boundary

1. All buildings and structures must be contained beneath a line of:

- a. 55° measured into the site from any point 3m vertically above ground level along northern boundaries; and
- b. 45° measured into the site from any point 3m vertically above ground level along any other site boundaries; or
- c. Within the Eastern Porirua Residential Precinct only:
  - i. 60° measured from a point 8m vertically above ground level along the first 20m of the side boundary as measured from the road frontage, and that part of any site boundary that adjoins the Open Space Zone or Sport and Active Recreation Zone; and
  - ii. 45° measured from a point 3m vertically above ground level at:
    - a. Any rear boundary except as identified in c.i. above;
    - b. The side boundary further than 20m from the road frontage; and
    - c. Any common boundary where the lot adjoins the Medium Density Residential Zone.

Matters of discretion are restricted to:

- 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 MRZ-Figure 2 below for defining the northern boundary.

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

See MRZ-Figure 4 below for the alternative height in relation to boundary standard in the Eastern Porirua Residential

Intensification Precinct.

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; and
- A gable end, dormer or roof where that portion beyond the height in relation to boundary is no greater than 1.5m<sup>2</sup> in area and no greater than 1m in height.

### Submission

This restriction is not aligned with the NPS-UD. The height in relation to boundary provisions would therefore need to be either increased, a new zone be created or specific overlay provisions need to be created.

### Relief sought

Adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission that will enable the objectives and policies of the NPS-UD.

**Point 69.9**

**Support / Support in part / Oppose**

Support in part

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** Standards

**Provision**

MRZ-S3 Building coverage

1. The maximum building coverage must not exceed 45% of net site area. Matters of discretion are restricted to:

This standard does not apply to:

- Pergola structures that are not covered by a roof;
- Uncovered decks no more than 300mm in height above ground level;
- Uncovered outdoor swimming pools;
- Buildings and structures that are no more than 2m<sup>2</sup> 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.

1. The visual dominance of the building on the street from the scale of the new building;
2. The visual dominance impact on adjacent residential sites; and
3. Whether topographical or other site constraints make compliance with the standard impractical.

**Submission**

1. This restriction is not aligned with the NPS-UD. The coverage would therefore need to be either increased, a new zone should be created or specific overlay provisions need to be created.

2. Uncovered decks are often more than 300mm above ground. It is difficult to build one that is not 300mm above ground once the structure is accounted for. Uncovered decks and/or patios should not be counted as site coverage unless they are more than 1m above ground.

**Relief sought**

1. Any method that will enable the objectives and policies of the NPS-UD

2. Amend S3 as follows:

MRZ-S3 Building coverage

1. The maximum building coverage must not exceed 45% of net site area. Matters of discretion are restricted to:

This standard does not apply to:

- Pergola structures that are not covered by a roof;
- Uncovered decks no more than ~~300m~~ 1m in height above

1. The visual dominance of the building on the street from the scale of the new building;
2. The visual dominance impact on adjacent residential sites; and
3. Whether topographical or other site constraints make compliance with the standard impractical.

ground level;

- Uncovered outdoor swimming pools;
- Buildings and structures that are no more than 2m<sup>2</sup> 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.

Or adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission.

**Point 69.10**

**Support / Support in part / Oppose**

Support in part

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** Standards

**Provision**

MRZ-S5      Setback from other boundaries

1. Buildings and structures must not be located within a 1m setback from any site boundary (other than a boundary with a road).

Except that:

- For multi-unit housing residential units and retirement villages, the setback 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 setback standard only applies at the external boundary of the site. The setback standard requirement does not apply:
  - On any horizontal or vertical boundary between connected residential units, and
  - 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:

- Buildings and structures that are no more than 2m<sup>2</sup> in floor area and 2m in height above ground level;
- Fences and standalone walls — see MRZ-R4;
- Any part of a building or structure that is 7m or less in length, where this exemption only occurs once per site;
- Uncovered decks no more than 300mm in height above ground level; or

Matters of discretion are restricted to:

1. Dominance on, and privacy of, adjacent residential sites; and
2. Whether topographical or other site constraints make compliance with the standard impractical.

- Eaves up to a maximum of 600mm in width and external gutters or downpipes (including their brackets) up to an additional width of 150mm.

**Submission**

1. If a comprehensive development of multi-units is designed there should be an ability to offset the buildings by more than 2m in both the horizontal and vertical direction. This rule as currently written promotes a more monolithic form. Offsetting the buildings can enhance privacy and amenity on both sides of the notional boundary. Delete the offset standards (fourth bullet point).
2. As per our Standard 3 comments, uncovered decks are often more than 300mm above ground. It is difficult to build one that is not 300mm above ground once the structure is accounted for. Uncovered decks and/or patios should not be counted as site coverage unless they are more than 1m above ground.

**Relief sought**

**MRZ-S5    Setback from other boundaries**

1. Buildings and structures must not be located within a 1m setback from any site boundary (other than a boundary with a road).

Except that:

- For multi-unit housing residential units and retirement villages, the setback 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 setback standard only applies at the external boundary of the site. The setback standard requirement does not apply:
  - On any horizontal or vertical boundary between connected residential units, and
  - ~~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:

- Buildings and structures that are no more than 2m<sup>2</sup> in floor area and 2m in height above ground level;
- Fences and standalone walls — see MRZ-R4;
- Any part of a building or structure that is 7m or less in length, where this exemption only occurs once per site;
- Uncovered decks no more than ~~300m~~ 1m in height above ground level; or

Matters of discretion are restricted to:

1. Dominance on, and privacy of, adjacent residential sites; and
2. Whether topographical or other site constraints make compliance with the standard impractical.

- Eaves up to a maximum of 600mm in width and external gutters or downpipes (including their brackets) up to an additional width of 150mm.

Or adopt any other such relief, including additions, deletions, or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission.

### Point 69.11

#### Support / Support in part / Oppose

Support in part

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** Standards

#### Provision

MRZ-S7 Outdoor living space – Residential unit and minor residential unit, excluding multi-unit housing

1. A minimum area of outdoor living space must be provided as follows: Matters of discretion are restricted to:

- a. Per residential unit located at ground floor:
  - i. 30m<sup>2</sup> at ground level; or
  - ii. 20m<sup>2</sup> at ground level in the Eastern Porirua Residential Intensification Precinct; and
- b. Per minor residential unit located at ground floor: 15m<sup>2</sup> at ground level; and
- c. Per minor residential unit located above ground floor: Balcony at least 8m<sup>2</sup> and a minimum dimension of 1.8m.
- d. Per residential unit located above ground floor: Balcony at least 8m<sup>2</sup> and a minimum dimension of 1.8m.

1. Whether adequate useable space is provided to accommodate outdoor activities;
2. Proximity of the residential unit to accessible public open space;
3. The accessibility and convenience of the outdoor living space for occupiers;
4. Whether adequate sunlight is provided to the outdoor living space throughout the year;
5. Whether the balance of open space and buildings maintains the openness on the site; and
6. Whether topographical or other site constraints make compliance with the standard impractical.

2. The outdoor living space must:

- a. Have a minimum 4m diameter circle with a maximum gradient of less than 1:20, where located on ground level;
- b. Be directly accessible to a habitable room, where provided as private outdoor living space;
- c. Be free of buildings, parking spaces and manoeuvring areas;
- d. Be orientated to the north, west and/east side of the residential unit, as shown in the diagram below; except that:
  - i. Up to 30% of the outdoor living area may be orientated to the south of the residential unit.

Except that:

- A minor residential unit that has direct access to a minimum 30m<sup>2</sup> of outdoor living space provided for the primary residential unit, is not required to provide a separate outdoor living space.

See MRZ-Figure 5 below which shows the required orientation for outdoor living space.

This standard does not apply to non-residential buildings or papakāinga.

### Submission

1. Wellington weather does not always lend itself to outdoor spaces being used. Providing medium density developments with spaces that can double up as indoor and outdoor spaces will have better outcomes. The Medium Density Design Guide does refer to Juliet Balconies, but there is value in providing wider solutions in the Standards that allow for this more flexibility in this area.

### Relief sought

#### MRZ-S7 Outdoor living space – Residential unit and minor residential unit, excluding multi-unit housing

1. A minimum area of outdoor living space must be provided as follows: Matters of discretion are restricted to:

- a. Per residential unit located at ground floor:
  - i. 30m<sup>2</sup> at ground level; or
  - ii. 20m<sup>2</sup> at ground level in the Eastern Porirua Residential Intensification Precinct; and
- b. Per minor residential unit located at ground floor: 15m<sup>2</sup> at ground level; and
- c. ~~Per All minor residential units located above ground floor: Balcony at least 8m<sup>2</sup> and a minimum dimension of 1.8m. must be provided with a space that is multifunctional and can be used as an outdoor and indoor living space in the form of a balcony, juliet balcony, deck roof terrace, or sunroom that has a minimum area of 8m<sup>2</sup> and has a minimum dimension of 1.8m;~~
- d. ~~Per All residential units located above ground floor must be provided with a space that is multifunctional and can be used as an outdoor and indoor living space in the form of a balcony, deck, roof terrace, or sunroom that has a minimum area of 8m<sup>2</sup> and as a minimum dimension of 1.8m;~~

1. Whether adequate useable space is provided to accommodate outdoor activities;
2. Proximity of the residential unit to accessible public open space;
3. The accessibility and convenience of the outdoor living space for occupiers;
4. Whether adequate sunlight is provided to the outdoor living space throughout the year;
5. Whether the balance of open space and buildings maintains the openness on the site; and
6. Whether topographical or other site constraints make compliance with the standard impractical.

2. The outdoor living space must:

- a. Have a minimum 4m diameter circle with a maximum gradient of less than 1:20, where located on ground level;
- b. Be directly accessible to a habitable room, where provided as private outdoor living space;
- c. Be free of buildings, parking spaces and manoeuvring areas;
- d. Be orientated to the north, west and/east side of the residential unit, as shown in the diagram below; except that:



- i. Up to 30% of the outdoor living area may be orientated to the south of the residential unit.

Except that:

- A minor residential unit that has direct access to a minimum 30m<sup>2</sup> of outdoor living space provided for the primary residential unit, is not required to provide a separate outdoor living space.

See MRZ-Figure 5 below which shows the required orientation for outdoor living space.

This standard does not apply to non-residential buildings or papakainga.

Or adopt any other such relief, including additions, deletions, or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission.

## Point 69.12

### Support / Support in part / Oppose

Support in part

**Section:** MRZ - Medium Density Residential Zone

**Sub-section:** Standards

### Provision

MRZ-S8 Outdoor living space – Multi-unit housing

1. A minimum area of outdoor living space must be provided as follows: Matters of discretion are restricted to:

- a. Per residential unit at ground floor level:
  - i. 30m<sup>2</sup> at ground level; or
  - ii. 20m<sup>2</sup> at ground level within the Eastern Porirua Residential Intensification Precinct; and
- b. Per minor residential unit located at ground floor: 15m<sup>2</sup> at ground level; and
- c. Per minor residential unit located above ground floor: Balcony at least 8m<sup>2</sup> and a minimum dimension of 1.8m.
- d. Per residential unit located above ground floor: Balcony at least 8m<sup>2</sup> and a minimum dimension of 1.8m.

1. Whether adequate useable space is provided to accommodate outdoor activities;
2. Proximity of the residential unit to accessible public open space;
3. The accessibility and convenience of the outdoor living space for occupiers;
4. Whether adequate sunlight is provided to the outdoor living space throughout the year;
5. Whether the balance of open space and buildings maintains the openness on the site; and
6. Whether topographical or other site constraints make compliance with the standard impractical.

Except that:

- For multi-unit housing, the outdoor living space can be provided as private space and shared space provided that:
  - Each residential unit at ground level is provided with

- a minimum private space of 16m<sup>2</sup>; and
- The shared space has minimum area of 30m<sup>2</sup>.

- A minor residential unit that has direct access to a minimum 30m<sup>2</sup> of outdoor living space provided for the primary residential unit, is not required to provide a separate outdoor living space.

2. The outdoor living space must:

- a. Have a minimum 4m diameter circle with a maximum gradient of less than 1:20, where located on ground level;
- b. Be directly accessible from a habitable room, where provided as private outdoor living space;
- c. Be free of buildings, parking spaces and manoeuvring areas; and
- d. Be orientated to the north, west and/east side of the residential unit, as shown in the diagram below; except that:
  - i. Up to 30% of the outdoor living space may be orientated to the south of the residential unit.

See MRZ-Figure 5 below which shows the required orientation for outdoor living space.

This standard does not apply to non-residential buildings or papakāinga.

**Submission**

1. Wellington weather does not always lend itself to outdoor spaces being used. Providing medium density developments with spaces that can double up as indoor and outdoor spaces will have better outcomes. The Medium Density Design Guide does refer to Juliet Balconies, but there is value in providing wider solutions in the Standards that allow for this more flexibility in this area.

2. Any communal outdoor space should be sized proportionately with the number of residential units that have access to it. Providing 30m<sup>2</sup> is acceptable for a small number of units but not sufficient for a more than 10 or 20 units complex. There also should be an emphasis on the quality of the shared space and the provision of high amenity value.

**Relief sought**

MRZ-S8 Outdoor living space – Multi-unit housing

1. A minimum area of outdoor living space must be provided as follows: Matters of discretion are restricted to:

- a. Per residential unit at ground floor level:

- 1. Whether adequate useable space is provided to accommodate outdoor activities;

- i. 30m<sup>2</sup> at ground level; or
- ii. 20m<sup>2</sup> at ground level within the Eastern Porirua Residential Intensification Precinct; and
- b. Per minor residential unit located at ground floor: 15m<sup>2</sup> at ground level; and
- c. ~~Per~~ All minor residential units located above ground floor: Balcony at least 8m<sup>2</sup> and a minimum dimension of 1.8m. must be provided with a space that is multifunctional and can be used as an outdoor and indoor living space in the form of a balcony, Juliet balcony, deck, roof terrace, or sunroom that has a minimum area of 8m<sup>2</sup> and has a minimum dimension of 1.8m;
- d. ~~Per~~ All residential units located above ground floor must be provided with a space that is multifunctional and can be used as an outdoor and indoor living space in the form of a balcony, deck, roof terrace, or sunroom that has a minimum area of 8m<sup>2</sup> and as a minimum dimension of 1.8m;

Except that:

- For multi-unit housing, the outdoor living space can be provided as private space and shared space provided that:
  - Each residential unit at ground level is provided with a minimum private space of 16m<sup>2</sup>; and
  - The shared space has minimum area of 30m<sup>2</sup> for 10 units and less, 60m<sup>2</sup> for 10-20 units and 90m<sup>2</sup> for more than 20 units
- A minor residential unit that has direct access to a minimum 30m<sup>2</sup> of outdoor living space provided for the primary residential unit, is not required to provide a separate outdoor living space.

2. The outdoor living space must:

- a. Have a minimum 4m diameter circle with a maximum gradient of less than 1:20, where located on ground level;
- b. Be directly accessible from a habitable room, where provided as private outdoor living space;
- c. Be free of buildings, parking spaces and manoeuvring areas; and
- d. Be orientated to the north, west and/east side of the residential unit, as shown in the diagram below; except that:
  - i. Up to 30% of the outdoor living space may be orientated to the south of the residential unit.

See MRZ-Figure 5 below which shows the required orientation for outdoor living space.

This standard does not apply to non-residential buildings or papakainga.

- 2. Proximity of the residential unit to accessible public open space;
- 3. The accessibility and convenience of the outdoor living space for occupiers;
- 4. Whether adequate sunlight is provided to the outdoor living space throughout the year;
- 5. Whether the balance of open space and buildings maintains the openness on the site; and
- 6. Whether topographical or other site constraints make compliance with the standard impractical.

Or adopt any other such relief, including additions, deletions, or consequential amendments necessary as a result of the matters

raised in this submission, as necessary to give effect to this submission.

### Point 69.13

#### Support / Support in part / Oppose

Support in part

**Section:** LCZ - Local Centre Zone

**Sub-section:** Policies

#### Provision

LCZ-P2 Residential activity

Provide for residential activity where:

1. It is located entirely above ground floor, where located along a primary frontage identified on the planning maps;
2. It does not interrupt or preclude an ongoing active building frontage that provides a positive interface with the public space;
3. Any residential unit is designed to:
  - a. Ensure that indoor noise and ventilation levels are appropriate for occupants; and
  - b. Provide amenity for residents in respect to outlook, privacy and daylight;
4. It is consistent with the Local Centre Zone Design Guide contained in APP7-Local Centre Zone Design Guide; and
5. Reverse sensitivity effects on commercial activities are minimised.

#### Submission

Providing no housing at ground floor level is not realistic in terms of the areas that are proposed to be developed as Local Centre Zone. A mix of commercial and residential could have positive outcomes in these areas as long as the amenity of ground floor units is managed. Residential activities should be encouraged to improve the mixed-use nature of the area.

#### Relief sought

LCZ-P2 Residential activity

Provide for residential activity where:

1. It is located ~~entirely~~ predominantly above ground floor, where located along a primary frontage identified on the planning maps;
2. It mostly does not interrupt or preclude an ongoing active building frontage that provides a positive interface with the public space;
3. Any residential unit is designed to:
  - a. Ensure that indoor noise and ventilation levels are appropriate for occupants; and
  - b. Provide amenity for residents in respect to outlook, privacy and daylight;
4. It is consistent with the Local Centre Zone Design Guide contained in APP7-Local Centre Zone Design Guide; and
5. Reverse sensitivity effects on commercial activities are minimised.

Or adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission.

### Point 69.14

#### Support / Support in part / Oppose

Support in part

**Section:** LCZ - Local Centre Zone

**Sub-section:** Policies**Provision**

## LCZ-P4 Inappropriate activities

Avoid activities that are incompatible with the anticipated purpose, character and amenity values of the Local Centre Zone and the surrounding environment.

**Submission**

Using the term avoid is too restrictive and it will be more appropriate to use the word minimise adverse effects.

**Relief sought**

## LCZ-P4 Inappropriate activities

~~Avoid~~ Minimise adverse effects from activities that are incompatible with the anticipated purpose, character and amenity values of the Local Centre Zone and the surrounding environment.

Or adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission.

**Point 69.15****Support / Support in part / Oppose**

Support in part

**Section:** LCZ - Local Centre Zone

**Sub-section:** Policies

**Provision**

## LCZ-P5 Built development

Provide for built development that:

1. Is of a scale that is compatible with the anticipated role and function of the Local Centre Zone and the surrounding area;
2. Reflects the anticipated medium-density scale and built character of the Local Centre Zone;
3. Is well designed and contributes to an attractive urban environment;
4. Provides active street frontages in locations identified on the planning maps; and
5. Is consistent with the Local Centre Zone Design Guide contained in APP7-Local Centre Zone Design Guide.

**Submission**

There is value in aligning these objective and policies better with the NPSUD, while keeping them relevant to other zones.

**Relief sought**

## LCZ-P5 Built development

Provide for built development that:

1. Is of a scale that is compatible with the anticipated role and function of the Local Centre Zone and the surrounding area;
2. Reflects the anticipated medium to higher-density scale and built character of the Local Centre Zone;
3. Is well designed and contributes to an attractive urban environment;
4. Provides active street frontages in locations identified on the planning maps; and
5. Is consistent with the Local Centre Zone Design Guide contained in APP7-Local Centre Zone Design Guide.

Or adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission.

## Point 69.16

### Support / Support in part / Oppose

Support in part

**Section:** LCZ - Local Centre Zone

**Sub-section:** Policies

### Provision

#### LCZ-P7 Interface with Residential Zones and Open Space and Recreation Zones

Minimise the adverse effects from use and development within the Local Centre Zone on directly adjoining sites that are zoned General Residential Zone, Medium Density Residential Zone, Open Space Zone or Sport and Active Recreation Zone by ensuring that:

1. Buildings and activities are located and designed to achieve a transition at the zone interface;
2. Buildings are located and designed to minimise shading and privacy effects on adjoining sites zoned Residential or Open Space and Recreation;
3. Buildings are of a bulk, height and form that minimises dominance and enclosure effects on adjoining sites zoned Residential or Open Space and Recreation; and
4. Screening and landscaping minimise adverse visual effects on adjoining sites zoned Residential or Open Space and Recreation.

### Submission

The policy as it stands does not encourage a positive relationship between the open space zone and the mixed-use zones but only focus on the management of adverse effects. Sites adjacent to open space zones should be encouraged to take advantage of the aspect and outlook to the open space and recreation zones, not screen them off. Passive surveillance opportunities should also be encouraged.

### Relief sought

#### LCZ-P7 Interface with Residential Zones and Open Space and Recreation Zones

Minimise the adverse effects from use and development within the Local Centre Zone on directly adjoining sites that are zoned General Residential Zone, Medium Density Residential Zone, Open Space Zone or Sport and Active Recreation Zone by ensuring that:

1. Buildings and activities are located and designed to achieve a transition at the zone interface;
2. Buildings are located and designed to minimise shading and privacy effects on adjoining sites zoned Residential or Open Space and Recreation;
3. Buildings are of a bulk, height and form that minimises dominance and enclosure effects on adjoining sites zoned Residential or Open Space and Recreation; and
4. Screening and landscaping minimise adverse visual effects on adjoining sites zoned Residential or Open Space and Recreation.

Development of sites adjacent to open space zones should be encouraged to take advantage of the aspect and outlook to the open space and recreation zones and development should be orientated to increase passive surveillance.

Or adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission.

## Point 69.17

**Support / Support in part / Oppose**

Support in part

Section: LCZ - Local Centre Zone

Sub-section: Rules

**Provision**

LCZ-R1 Buildings and structures, including additions and alterations

1. Activity status: **Permitted**

Where:

- a. The gross floor area of the new building does not exceed 450m<sup>2</sup>;
- b. Any addition to an existing building does not result in the total gross floor area of the building exceeding 450m<sup>2</sup>; and
- c. Compliance is achieved with
  - i. LCZ-S1;
  - ii. LCZ-S2;
  - iii. LCZ-S3;
  - iv. LCZ-S4;
  - v. LCZ-S5;
  - vi. LCZ-S6; and
  - vii. LCZ-S7.

**Submission**

The minimum GFA requirement will not result in the outcomes sought. This does not take into consideration that buildings can be constructed up to three levels. That would mean that any three level building with each level a 150m<sup>2</sup> is not permitted. This is too restrictive. It is understood that the Council want to restrict big bulk retail in this zone, but a better method to the gross floor area should be looked at. Rather refer to ground floor area. Other methods will also include management through bulk and character.

**Relief sought**

LCZ-R1 Buildings and structures, including additions and alterations

1. Activity status: **Permitted**

Where:

- a. The gross floor area of the new building does not exceed 450m<sup>2</sup>;
- b. Any addition to an existing building does not result in the total gross floor area of the building exceeding 450m<sup>2</sup>; and
- c. Compliance is achieved with
  - i. LCZ-S1;
  - ii. LCZ-S2;
  - iii. LCZ-S3;
  - iv. LCZ-S4;
  - v. LCZ-S5;
  - vi. LCZ-S6; and
  - vii. LCZ-S7.

**Point 69.18**

**Support / Support in part / Oppose**

Support in part

**Section:** LCZ - Local Centre Zone

**Sub-section:** Standards

**Provision**

LCZ-S1    Height

1. All buildings and structures must not exceed a maximum height above ground level of 12m, except that:
- a. An additional 1m can be added to the maximum height of any building with a roof slope of 15° or greater; and
  - b. Any fence or standalone wall along a side or rear boundary which adjoins a site zoned General Residential, Medium Density Residential, Open Space or Sport and Active Recreation must not exceed 2m in height.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 1m;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m; or
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m.
- Lift overruns provided these do not exceed the height by more than 1m.

Matters of discretion are restricted to:

1. The location, design and appearance of the building or structure;
2. Any adverse effects on the streetscape;
3. Visual dominance, shading and loss of privacy for adjoining Residential or Open Space and Recreation zoned sites;
4. Compatibility with the anticipated scale, proportion and context of buildings, structures and activities in the surrounding area;
5. Whether an increase in building height results from a response to natural hazard mitigation; and
6. Consistency with the Local Centre Zone Design Guide.

**Submission**

This height restriction is not aligned with the NPS-UD. The height would therefore need to be either increased, a new zone be created or specific overlay provisions need to be created.

**Relief sought**

Any method that will enable the objectives and policies of the NPS-UD.

**Point 69.19**

**Support / Support in part / Oppose**

Support in part

**Section:** LCZ - Local Centre Zone

**Sub-section:** Standards

**Provision**

LCZ-S2    Height in relation to boundary



1. All buildings and structures must be contained beneath a line of 45° measured into the site from any point 3m vertically above ground level along any side or rear boundary where that boundary adjoins a General Residential Zone, Medium Density Residential Zone, Open Space Zone or Sport and Active Recreation Zone.

Matters of discretion are restricted to:

Except that:

- Where adjacent to a shared access in excess of 2.5m in width, the measurement shall be taken from the furthest side.

1. Visual dominance, shading and loss of privacy for adjoining Residential or Open Space and Recreation zoned sites;
2. The location, design and appearance of the building or structure;
3. Whether an increase in height in relation to boundary results from a response to natural hazard mitigation; and
4. Whether any architectural features or steps are proposed in the building façade to provide an attractive appearance when viewed from adjoining Residential or Open Space and Recreation zoned sites.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height in relation to boundary by more than 1m;
- 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; or
- 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.

**Submission**

This height restriction is not aligned with the NPS-UD. The height would therefore need to be either increased, a new zone be created or specific overlay provisions need to be created.

**Relief sought**

Any method that will enable the objectives and policies of the NPS-UD.

**Point 69.20**

**Support / Support in part / Oppose**

Support in part

**Section:** LCZ - Local Centre Zone

**Sub-section:** Standards

**Provision**

LCZ-S3    Setback

1. Buildings and structures must not be located within a 3m setback from a side or rear boundary where that boundary adjoins a General Residential Zone, Medium Density Residential Zone, Open Space Zone or Sport and Active Recreation Zone.

Matters of discretion are restricted to:

This standard does not apply to:

1. The visual amenity of adjoining Residential and Open Space and Recreation sites;
2. The location, design and appearance of the building or structure;
3. Whether any architectural features or steps are proposed in the building façade to provide an attractive appearance

- One accessory building or structure less than 2m in height and less than 7m long per site; or
- Fences or standalone walls.

- when viewed from adjoining Residential or Open Space and Recreation sites; and
4. Any benefits, including the extent to which the reduced setback will result in a more efficient, practical and better use of the balance of the site.

**Submission**

The side yard requirements are overly restrictive and will not be conducive to creating compact local centers.

There should be no side yard requirements between this zone and the Medium Density Residential. Side yards with other zones should be reduced to 1.5m.

**Relief sought**

**LCZ-S3      Setback**

1. Buildings and structures must not be located within a 1.53m setback from a side or rear boundary where that boundary adjoins a General Residential Zone, ~~Medium Density Residential Zone~~, Open Space Zone or Sport and Active Recreation Zone.

This standard does not apply to:

- One accessory building or structure less than 2m in height and less than 7m long per site; or
- Fences or standalone walls.

Matters of discretion are restricted to:

1. The visual amenity of adjoining Residential and Open Space and Recreation sites;
2. The location, design and appearance of the building or structure;
3. Whether any architectural features or steps are proposed in the building façade to provide an attractive appearance when viewed from adjoining Residential or Open Space and Recreation sites; and
4. Any benefits, including the extent to which the reduced setback will result in a more efficient, practical and better use of the balance of the site.

**Point 69.21**

**Support / Support in part / Oppose**

Support in part

**Section:** LCZ - Local Centre Zone

**Sub-section:** Standards

**Provision**

**LCZ-S5      Location of residential units**

1. Along boundaries with primary street-facing façade controls identified in the planning maps, all residential units must be located above ground floor.

Matters of discretion are restricted to:

1. The amenity and quality of the streetscape;
2. The amenity for the occupiers of the residential units; and
3. Consistency with the Local Centre Zone Design Guide.

**Submission**

This standard is not realistic in terms of the areas that are proposed to be developed as Local Centre Zone. A mix of commercial and residential uses at ground floor level can have positive outcomes in the Local Centre Zone areas while there is a need to protect the amenity of the residential units at ground floor level.

## Relief sought

## LCZ-S5 Location of residential units

1. Along boundaries with primary street-facing façade controls identified in the planning maps, all 35 % of the street frontage may contain residential units at ground ~~residential units must be located above ground floor.~~

Matters of discretion are restricted to:

1. The amenity and quality of the streetscape;
2. The amenity for the occupiers of the residential units; and
3. Consistency with the Local Centre Zone Design Guide.

Or adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission.

## Point 69.22

## Support / Support in part / Oppose

Support in part

Section: LCZ - Local Centre Zone

Sub-section: Standards

Provision

## LCZ-S6 Outdoor living space

1. Each residential unit located on the ground floor must be provided with an outdoor living space that:

- a. Has a minimum area of 20m<sup>2</sup>;
- b. Has a minimum dimension of 3m;
- c. Is directly accessible from a habitable room in the residential unit to which it relates; and
- d. Is free of buildings, parking spaces and manoeuvring areas.

Matters of discretion are restricted to:

1. Whether adequate useable space is provided to accommodate outdoor activities;
2. Whether there are topographical or other site constraints that make compliance with the standard impractical;
3. The proximity of the residential unit to accessible public open space; and
4. Consistency with the Local Centre Zone Design Guide.

2. Each residential unit located entirely above ground floor must be provided with an outdoor living space in the form of a balcony, deck or roof terrace that:

- a. Has a minimum area of 10m<sup>2</sup>;
- b. Has a minimum dimension of 2m; and
- c. Is directly accessible from a habitable room in the residential unit to which it relates.

3. For multi-unit housing, the outdoor living space can be provided as private space and shared space provided that:

- a. Each residential unit is provided with a private outdoor living space that has a minimum area of 10m<sup>2</sup> with a minimum dimension of 2m, that is directly accessible from a habitable room in the residential unit to which it relates;

- b. The shared outdoor living space has a minimum area of 20m<sup>2</sup> with a minimum dimension of 3m; and
- c. Any ground floor outdoor living space is free of buildings, parking spaces and manoeuvring areas.

## Submission

Wellington weather does not always lend itself to outdoor spaces being used. Providing medium density developments with spaces that can double up as indoor and outdoor spaces will have better outcomes. Standards that allow for this flexibility will be more suitable.

## Relief sought

### LCZ-S6 Outdoor living space

1. Each residential unit located on the ground floor must be provided with an outdoor living space that:

- a. Has a minimum area of 20m<sup>2</sup>;
- b. Has a minimum dimension of 3m;
- c. Is directly accessible from a habitable room in the residential unit to which it relates; and
- d. Is free of buildings, parking spaces and manoeuvring areas.

2. Each residential unit located entirely above ground floor must be provided with a space that is multifunctional and can be used as an outdoor and indoor living space in the form of a balcony, a juliet balcony deck or roof terrace or sunroom ~~than outdoor living space in the form of a balcony, deck or roof terrace~~ that:

- a. Has a minimum area of 10m<sup>2</sup>;
- b. Has a minimum dimension of 2m; and
- c. Is directly accessible from a habitable room in the residential unit to which it relates.

3. For multi-unit housing, the outdoor living space can be provided as private space and shared space provided that:

- a. Each residential unit is provided with a private outdoor living space that has a minimum area of 10m<sup>2</sup> with a minimum dimension of 2m, that is directly accessible from a habitable room in the residential unit to which it relates;
- b. The shared outdoor living space has a minimum area of 20m<sup>2</sup> with a minimum dimension of 3m; and
- c. Any ground floor outdoor living space is free of buildings, parking spaces and manoeuvring areas.

Matters of discretion are restricted to:

- 1. Whether adequate useable space is provided to accommodate outdoor activities;
- 2. Whether there are topographical or other site constraints that make compliance with the standard impractical;
- 3. The proximity of the residential unit to accessible public open space; and
- 4. Consistency with the Local Centre Zone Design Guide.

Or adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission.

**Point 69.23****Support / Support in part / Oppose**

Support in part

**Section:** LCZ - Local Centre Zone**Sub-section:** Standards**Provision****LCZ-S7 Screening and landscaping of service areas, outdoor storage areas and parking areas**

1. Any on-site service area, including rubbish collection areas, and area for the outdoor storage of goods or materials must, without preventing the provision of an entry point to the site, be fully screened by a fence or landscaping where it is visible from any:

- a. Public road;
- b. Other public space; and
- c. Directly adjoining site zoned General Residential, Medium Density Residential, Open Space or Sport and Active Recreation.

2. Any on-site parking area must:

- a. Be fully screened by a fence or landscaping from any directly adjoining site zoned General Residential, Medium Density Residential, Open Space or Sport and Active Recreation.
- b. Where located along a street edge, provide a landscaping strip that extends at least 1.5m from the boundary with the road and comprise a mix of trees, shrubs and ground cover plants, without preventing the provision of an entry point to the site.

Except that:

- The landscaping requirement for on-site parking areas along a street edge does not apply to individual parking spaces for residential development, if provided.

Matters of discretion are restricted to:

1. Any adverse effects on the streetscape;
2. The visual amenity of adjoining Residential and Open Space and Recreation zoned sites including shading;
3. The service, storage and parking needs of the activity;
4. The size and location of service, storage and parking areas; and
5. Consistency with the Local Centre Zone Design Guide.

**Submission**

Parking areas should not need to be screened from open space or recreation zones. These areas have their own associated parking and therefore viewing parking from these areas is not out of place. Screening parking will also reduce passive surveillance and does not support a sense of openness.

**Relief sought****LCZ-S7 Screening and landscaping of service areas, outdoor storage areas and parking areas**

1. Any on-site service area, including rubbish collection areas, and area for the outdoor storage of goods or materials must, without preventing the provision of an entry point to the site, be fully screened by a fence or landscaping where it is visible from any:

- a. Public road;
- b. Other public space; and
- c. Directly adjoining site zoned General Residential, Medium Density Residential, Open Space or Sport and Active Recreation.

2. Any on-site parking area must:

- a. Be fully screened by a fence or landscaping from any directly adjoining site zoned General Residential, Medium Density Residential, ~~Open Space or Sport and Active Recreation~~.
- b. Where located along a street edge, provide a landscaping strip that extends at least 1.5m from the boundary with the road and comprise a mix of trees, shrubs and ground cover plants, without preventing the provision of an entry point to the site.

Except that:

- The landscaping requirement for on-site parking areas along a street edge does not apply to individual parking spaces for residential development, if provided.

Matters of discretion are restricted to:

- 1. Any adverse effects on the streetscape;
- 2. The visual amenity of adjoining Residential and Open Space and Recreation zoned sites including shading;
- 3. The service, storage and parking needs of the activity;
- 4. The size and location of service, storage and parking areas; and
- 5. Consistency with the Local Centre Zone Design Guide.

Or adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission.

**Point 69.24**

**Support / Support in part / Oppose**

Support in part

**Section:** CE - Coastal Environment

**Sub-section:** Policies

**Provision**

**CE-P14 Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities in the High Hazard Areas**

Avoid the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities in the High Hazard Areas of the Coastal Hazard Overlays unless it can be demonstrated that:

- 1. The activity has a critical operational need to locate within the High Hazard Area and locating outside the High Hazard Area is not a practicable option;
- 2. The activity incorporates mitigation measures that demonstrate that risk to people's life and wellbeing, property damage and the environment is avoided, and people can evacuate safely during a natural hazard event; and
- 3. The risk to the activity and surrounding properties is either avoided or is low due to site specific factors, and/or the scale, location and design of the activity.

**Submission**

This policy is too restrictive and does not allow high-risk activities that can prove that risk is managed, mitigated and/or avoided. For example, should a medium density residential development be proposed in the coastal inundation area and the proposal provides evidence that through design and mitigation measures the risks are managed and residents are safe, the proposal will not meet point one of the policy. There is a need to amend the policy to more freely allow for this.

**Relief sought****CE-P14 Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities in the High Hazard Areas**

Avoid the establishment of Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities in the High Hazard Areas of the Coastal Hazard Overlays unless it can be demonstrated that:

1. The activity has a critical operational need to locate within the High Hazard Area and locating outside the High Hazard Area is not a practicable option; or
2. The activity includes mitigation and avoidance measures as follows:
  - The activity incorporates mitigation measures that demonstrate that risk to people's life and wellbeing, property damage and the environment is avoided, and people can evacuate safely during a natural hazard event; and
  - The risk to the activity and surrounding properties is either avoided or is low due to site specific factors, and/or the scale, location and design of the activity.

Or adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in this submission, as necessary to give effect to this submission.

PAREMATA BUSINESS PARK RELIEF SOUGHT – CHANGE TO ZONING MAPS

1. Change the zoning map around the properties situated at 5-17 Paremata Crescent as follows:
2. Option 1: Change the General Residential Zone to the east of the Paremata Business Park properties to Medium Density Residential Zone.

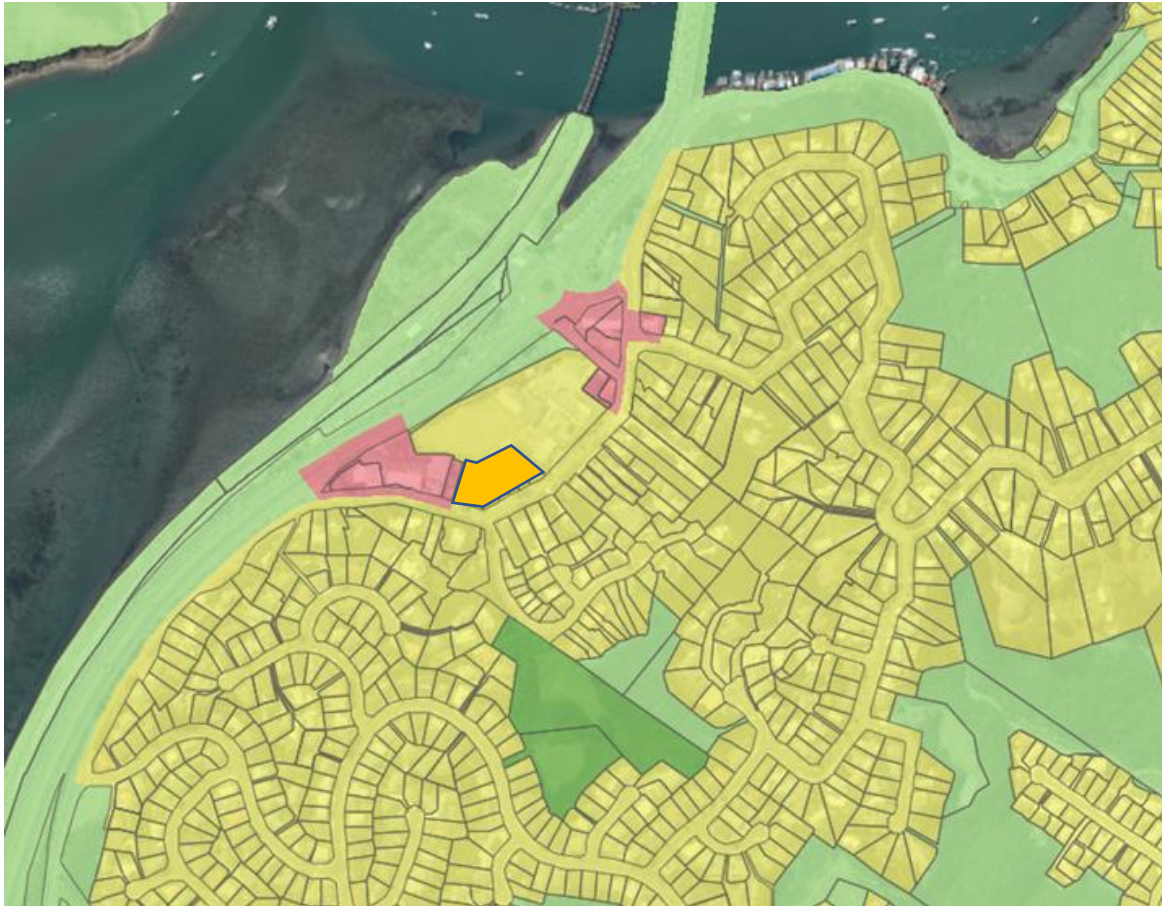


Figure 3 Orange area - Change zone from General Residential Zone to Medium Density Residential Zone.

3. Option 2: Change the General Residential Zone to the east of the Paremata Business Park properties to extend the Local Centre Zone.





Figure 4 Pink area with blue line - change zone from General Residential Zone to Local Centre Zone.

4. Adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in these submissions, as necessary to give effect to this submission.

## PAREMATA BUSINESS PARK RELIEF SOUGHT – INCORPORATION OF THE NPS-UD

1. Incorporate the requirements of the NPS-UD into the Proposed District Plan in terms of objectives and policies, rules and standards in all areas around railway stations in the Porirua District.
2. Option 1: Create a new medium density zone and mixed-use zone with associated objectives, policies, rules and standards that address the areas as set out in Policy 3 of the NPS-UD. This approach is supported as the existing medium density zone provisions are too limiting to address development up to six stories



Figure 1 Bright pink areas – Local Centre Zone that allows up to six storeys, blue area – new Medium Density Zone allowing up to six storeys.

3. Option 2: Create an overlay over the existing zone areas allowing for the facilitation of higher densities.



Figure 2 Bright pink area – overlay area that allows up to six storeys.

4. Option 3: Amend the existing medium density zone provisions to allow for higher density developments. An indication of what key standards will require amendment is indicated in sections 5 and 6 below.
5. Adopt any other such relief, including additions, deletions or consequential amendments necessary as a result of the matters raised in these submissions, as necessary to give effect to this submission.

**Correspondence between  
Council and submitter which  
forms part of this submission**

**Louise White**

---

**From:** Linda Bruwer <linda.bruwer@cuttriss.co.nz>  
**Sent:** Friday, 22 January 2021 9:37 AM  
**To:** dpreview  
**Subject:** [EXTERNAL] RE: Paremata Business Park Ltd - submission on Proposed District Plan

**Categories:** Assigned - In progress

Hi Michael,

I can confirm that I am happy to relocate 69.6 to General rather than the planning maps.

Thanks,  
Linda

**Linda Bruwer** | Senior Planner  
**Cuttriss Consultants Limited**  
Email. [linda.bruwer@cuttriss.co.nz](mailto:linda.bruwer@cuttriss.co.nz)  
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**Holiday period:** We close at midday on **Wednesday, 23 December 2020** and reopen on **Monday, 11 January 2021**.

Have a safe and happy Christmas from the team at Cuttriss.

---

**From:** dpreview <dpreview@porirua.govt.nz>  
**Sent:** Wednesday, 20 January 2021 2:40 pm  
**To:** Linda Bruwer <linda.bruwer@cuttriss.co.nz>  
**Cc:** dpreview <dpreview@porirua.govt.nz>  
**Subject:** FW: Paremata Business Park Ltd - submission on Proposed District Plan

Hello Linda

Thanks for calling. Further to conversation, I think it would be best to assign this to "General" rather than "Planning Maps", since it is more of a whole of plan submission point. As we discussed your client's are not necessarily seeking a decision from the panel that these areas should be rezoned or subject to some form of height variation precinct as part of this submission process, but rather these are possible tools that could be used to give effect to the NPS-UD. As such the maps are simply for information purpose to support your submission that more needs to be done generally to implement the requirements of the NPS-UD.

Please can you confirm that you are happy to relocate 69.6 to "General" rather than "Planning Maps".

Ngā mihi,

**Michael Rachlin**

Principal Policy Planner  
Kaihanga Mahere Kaupapahere Matua

**Please note that I do not work on a Monday.**

**porirua**city

Tel: 04 237 1498  
Mob: 021 198 5786  
porirua.govt.nz

---

**From:** Michael Rachlin  
**Sent:** Wednesday, 20 January 2021 2:16 PM  
**To:** Linda Bruwer <[linda.bruwer@cuttriss.co.nz](mailto:linda.bruwer@cuttriss.co.nz)>  
**Cc:** dpreview <[dpreview@porirua.govt.nz](mailto:dpreview@porirua.govt.nz)>  
**Subject:** Paremata Business Park Ltd - submission on Proposed District Plan

Hello Linda

As you'll be aware I'm currently in the process of summarising this submission. For point 69.6 (implementing the NPS-UD), should the spatial extent of the zoning/height increase areas you have shown on the attachment with the submission form part of the relief sought? If so we will need to reference them in the summary of the relief sought for the further submission summary document.

Thanks

Ngā mihi,

**Michael Rachlin**

Principal Policy Planner  
Kaihanga Mahere Kaupapahere Matua

**Please note that I do not work on a Monday.**

**porirua**city

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## Louise White

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**From:** Linda Bruwer <linda.bruwer@cuttriss.co.nz>  
**Sent:** Friday, 22 January 2021 2:17 PM  
**To:** dpreview  
**Subject:** [EXTERNAL] RE: Paremata Business Park Ltd - submission on Proposed District Plan

**Categories:** Assigned - In progress

Hi Michael,

Yes, I happy with the proposed wording.

Thanks,  
Linda

**Linda Bruwer** | Senior Planner  
**Cuttriss Consultants Limited**  
Email. [linda.bruwer@cuttriss.co.nz](mailto:linda.bruwer@cuttriss.co.nz)  
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[Facebook](#) | [Instagram](#) | [LinkedIn](#)

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**From:** dpreview <dpreview@porirua.govt.nz>  
**Sent:** Friday, 22 January 2021 2:07 pm  
**To:** Linda Bruwer <linda.bruwer@cuttriss.co.nz>  
**Cc:** dpreview <dpreview@porirua.govt.nz>  
**Subject:** FW: Paremata Business Park Ltd - submission on Proposed District Plan

Hello Linda  
Sorry to bother you, but are you happy with my wording below?

Ngā mihi,

**Michael Rachlin**  
Principal Policy Planner  
Kaihanga Mahere Kaupapahere Matua

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**porirua**city

Tel: 04 237 1498  
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porirua.govt.nz

**From:** Michael Rachlin  
**Sent:** Wednesday, 20 January 2021 2:03 PM  
**To:** Linda Bruwer <[linda.bruwer@cuttriss.co.nz](mailto:linda.bruwer@cuttriss.co.nz)>  
**Cc:** dpreview <[dpreview@porirua.govt.nz](mailto:dpreview@porirua.govt.nz)>  
**Subject:** Paremata Business Park Ltd - submission on Proposed District Plan

Hello Linda

I'm currently in the process of summarising this submission, and for point 69.7 (rezone land to the east of your client's land holding), are you happy if I record the decision sought as:

Rezone the properties situated to the east of 5-17 Paremata Crescent as follows:

- Option 1: From General Residential Zone to Medium Density Residential Zone; or
- Option 2: From General Residential Zone Local Centre Zone.

Adopt any other such relief, including additions, deletions, or consequential amendments necessary as a result of the matters raised in these submissions, as necessary to give effect to this submission.

Thanks.

Ngā mihi,

**Michael Rachlin**

Principal Policy Planner  
Kaihanga Mahere Kaupapahere Matua

**Please note that I do not work on a Monday.**

**porirua**city

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