

Appendix 1B – Additional commentary on matters not specifically addressed in the initial s42A report

Streetlighting

Submitter Name	#	Topic	Support/Oppose/Support in Part	Relief Sought
A. van Niekerk	2.5	Urban Design – Lighting	Support	Council to request a low impact lighting assessment of the residential housing development proposed.
C. and R. Owen	5.6	Urban Design – Lighting	Support in part	Council to request a low impact lighting assessment of the residential housing development proposed.
G. Van Niekerk	18.5	Urban Design – Lighting	Support	Council to request a low impact lighting assessment of the residential housing development proposed.
K. Marment	32.5	Urban Design	Support in part	Submitter seeks for new provisions around dark skies by limiting light pollution.
Moana Views Committee	45.5	Urban Design – Lighting	Support	Council to request a low impact lighting assessment of the residential housing development proposed.
R. Woolnough	56.1	Utilities	Oppose	Amend – submitter opposes any and all streetlighting installed at Mangawhai Hills.

I consider that the provision of streetlighting is integral to urban environments in order to enable safe utilisation of public spaces and roads. Whilst PPC84 includes large areas of greenspace, it is located immediately adjacent to the existing urban township and at 600 dwellings has a density that in my view makes the provision of street lighting appropriate (as opposed to rural roads).

I am aware of instances where street lighting has been restricted via either District Plan rules or resource consent conditions due to site-specific values, such as in Tekapo due to internationally recognised ‘dark sky’ values and associated observatories, and in Westland and Kaikoura for locations in close proximity to seabird nesting sites. Neither ecological expert has identified issues with lighting that would significantly affect threatened or endangered wildlife in Mangawhai and therefore I do not consider that a control on lighting is necessary.

Built Form Standards

Submitter Name	#	Topic	Support/Oppose/Support in Part	Relief Sought
Subdivision/ site coverage / development standards				
Berggren Trustee Co Ltd	4.5	Subdivision	Oppose in part	Amend rule DEV1 – R19 as follows 1. Activity Status: Restricted Discretionary Where:

Submitter Name	#	Topic	Support/Oppose/ Support in Part	Relief Sought
				a. Proposed allotments have a minimum net site area (excluding access legs) of 1,000m ² , except where the proposed allotment is an access allotment, utility allotment or road to vest in Council. (...)
Berggren Trustee Co Ltd	4.7	Site Coverage	Oppose in part	Amend DEV1 – S1 to increase permitted site coverage.
Berggren Trustee Co Ltd	4.8	Development Standards	Oppose in part	Submitter seeks for the standards to be reviewed in the context of the zone description, objectives and policies, DEV1 – S4 with specific reference to large lot residential density and pattern of development including site coverage, setbacks, and building orientation.
M. Tschirky	41.1	Density	Support	Submitter seeks that minimum house sizing be 250m ² with a maximum number of houses imposed with the PPC84 area.

Net site area definition (Berggren 4.5)

PPC84 sets a minimum site area through subdivision rule DEV1-R19 where: *“Proposed allotments have a minimum net site area (Excluding access legs) of 1,000m², except where the proposed allotment is an access allotment, utility allotment or road to vest in Council”*.

The submitter notes that the access leg exclusion is unnecessary where the definition of ‘net site area’ already excludes access legs. In short, it appears that there is agreement as to outcome, namely the net site area should be in addition to any land taken up with access legs, with the submission point focussing simply on efficient plan drafting.

PPC84 relies on the definitions in the National Planning Standards (NPS) rather than the Operative Plan (where there is the same definition in both documents). The NPS definition of ‘net site area’ is as follows:

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 subject to a designation that may be taken or acquired under the Public Works Act 1981.*

I agree with the submitter that the NPS definition already contains the exclusion and therefore there is no need for this exclusion to be duplicated in the rule itself. I therefore recommend that the exclusion be deleted and this submission point be accepted:

DEV1-R19: Proposed allotments have a minimum net site area (excluding access legs) of 1,000m², except where the proposed allotment is an access allotment, utility allotment or road to vest in Council”.

Building coverage (Berggren 4.7)

The submitter seeks that the proposed site coverage rule (DEV1-S1) be increased by an unspecified amount on the basis that 300m² is too small for most dwellings and accessory buildings.

The proposed rule DEV-S1 is:

The maximum building coverage is the lesser of 30% of the net site area or 500m² except where within the Landscape Protection Area where the maximum building coverage is 25% of the net site area or 250m²; and

(2) The maximum percentage of the net site area covered by impervious surfaces shall be 50%.

For reference, the ODP Residential rules permit 35% building coverage (13.10.13) and 40% impermeable surfacing (13.10.12). PPC84 therefore constitutes a reduction in building coverage and an increase in the impervious surfacing allowance compared with the ODP.

I consider that a permitted building coverage control of 300m² is not unduly restrictive, noting that for larger sites the permitted coverage of buildings increases. It is important to note that the control is on building coverage/ footprint, not gross floor area. A building with 300m² coverage if two stories could have an overall floor area of 600m². Given that large family homes are typically around 250m² in total, in my view the proposed rule package provides an appropriately large permissible building envelope that should be more than adequate for most residential dwellings. As such I do not recommend any changes to this provision.

Building setbacks (Berggren 4.8)

The submitter raises concerns that the proposed building setbacks rule (DEV1-S4) does not provide sufficient spaciousness between buildings and as such does not align with the proposed policy directions regarding built form. No alternative relief or text amendments are proposed by the submitter. PPC84 includes two rules that address different aspects of internal boundary setbacks as follows:

DEV1-S4 Setbacks from internal boundaries

- (1) Buildings, accessory buildings, and structures shall be setback a minimum of 3m from the boundary of any internal boundary, except:*
 - (a) No setback is required where the building or structure shares a common wall along an internal boundary.*
 - (b) No setback is required for accessory buildings and garages where the cumulative wall length adjacent to any internal boundary is no greater than 7m.*
 - (c) No setback is required for internal boundary fences.*
 - (d) No setback is required for uncovered decks or swimming pools that are less than 0.5m in height above ground level.*

DEV1-S8 Residential Unit separation distance

(1) Residential units must be separated:

- (a) At least 3m from any other detached residential unit within the same site; or
- (b) At least 6m from any other detached residential units where there is a private open space area located between two residential units.

For comparison, the ODP residential Zone setback rules (13.10.7) require a minimum 3m internal boundary setback within the Harbour Overlay (i.e. all of urban Mangawhai). No setbacks are required in the ODP for accessory buildings where vehicle access is retained to the rear of the site, the accessory building is more than 3m from any habitable room on an adjoining site, and it does not exceed the lesser of 10m or 25% of the internal boundary length.

In my view the proposed rules are broadly consistent with the ODP provisions that apply to residential environments with a 1,000m² minimum site size. The accessory building exemptions are a pragmatic response to providing site layout flexibility for small structures which include things such as garden sheds, water tanks, and garages. The location of such types of building adjacent to internal boundaries is common in suburban environments. I consider the proposed setback rules, in combination with controls on height to boundary and site coverage, will as a package deliver an outcome that is consistent with the proposed policy direction of maintaining a sense of spaciousness between built form; providing a scale and form of built development that achieves an appropriate standard of residential amenity and design; and a built form that relates to neighbouring properties by employing setbacks, sensitive building orientation and design, and landscaping to mitigate dominance and privacy impacts'. (DEV-P1(4), (7), and (8)). As such I do not recommend any amendments to the rules.

Minimum house size (Tschirky 41.1)

The submitter seeks to require a minimum house size of 250m². I consider that such a rule would by design result in only large (and therefore higher value) homes being developed. I consider there is greater benefit in enabling a range of house sizes to be developed, thereby better meeting the community's diverse housing needs where not all households want or need a large/ expensive dwelling.

Submissions in general support or opposition to the Plan Change

Most submissions began with an overall statement as to whether the submitter was in support or opposition to the plan change. These 'overall position' submission points are included here for completeness and to ensure all submission points are included in this updated report.

Submitter Name	#	Topic	Support/Oppose/Support in Part	Relief Sought
Submissions on PPC84 as a whole				
A. Skerten	1.1	PPC84	Support	Retain PPC84 in its entirety as notified.
G. Hosking	15.1	PPC84 in whole	Support	Retain PPC84 in its entirety as notified.

Submitter Name	#	Topic	Support/Oppose/ Support in Part	Relief Sought
G. Wilson	19.1	PPC84 in whole	Support	Retain PPC84 in its entirety as notified.
J. Mentzer	23.1	PPC84 in whole	Support	Retain PPC84 in its entirety as notified.
J. Walters	25.1	PPC84 in whole	Support	Retain PPC84 in its entirety as notified.
K. Innes	30.1	PPC84 in whole	Support	Retain PPC84 in its entirety as notified.
K. James & H. Canton	31.1	PPC84 in whole	Support	Retain PPC84 in its entirety as notified.
D. Hayward (Late submission)	36.1	PPC84 in whole	Support	Retain PPC84 in its entirety as notified.
R. Moffat (Late submissions)	37.1	PPC84 in whole	Support	Retain PPC84 in its entirety as notified.
M. Loheni	40.1	PPC84 in whole	Support	Retain PPC84 as notified.
Mangawhai Church Trust	43.1	PPC84 as a whole	Support in part	The submitter is in support of PPC84 but seeks for amendments relating to appropriate infrastructure connections.
R. Henry	55.1	PPC84 in whole	Support	Retain PPC84 in its entirety as notified.
S. Bray	61.1	PPC84 in whole	Support	Retain PPC84 in its entirety as notified.
T. de Baugh	66.1	PPC84 in whole	Support	Retain PPC84 in its entirety as notified.
T. Simpkin	69.1	PPC84 in whole	Support	Retain PPC84 as notified.
C. Best (Late submission)	74.1	PPC84 in whole	Support	Retain PPC84 as notified.
D. Patel	75	PPC84 in whole	Support	Retain PPC84 as notified.

Submitter Name	#	Topic	Support/Oppose/ Support in Part	Relief Sought
Berggren Trustee Co Ltd	4.1	PPC84 in whole	Oppose	Delete PPC84 in its entirety, unless changes to the proposed provisions are made as outlined below.
C. Boonham	6.1	PPC84 in whole	Oppose	Delete PPC84 in its entirety.
D. Bell	9.1	PPC84 in whole	Oppose	Delete PPC84 in its entirety OR delay the proposal until it is required when the spatial plan is fulfilled.
D. Bolton	10.3	PPC84	Oppose	No specific relief sought.
D. Parker	11.1	PPC84 in whole	Oppose	The submitter seeks for PPC84 to be declined unless the requested changes are made.
J. Sax	24.1	PPC84 in whole	Oppose	Delete PPC84 in its entirety.
J. Young	27.1	PPC84 in whole	Oppose	Delete PPC84 in its entirety.
K. Reid	34.1	PPC84 in whole	Oppose	Delete PPC84 in its entirety.
L. Kendall	35.1	PPC84 in whole	Oppose	Delete PPC84 in its entirety.
N. & D. Wilson	46.1	PPC84 in whole	Oppose	Delete PCC84 in its entirety.
P. Harris	50.1	PPC84 in whole	Oppose	Delete PPC84 in its entirety.
P. Muller	51.1	PPC84 in whole	Oppose	Delete PPC84 in its entirety and retain current zoning.
Ryan McQuerry	58.1	PPC84 in whole.	Oppose	Delete PPC84 in its entirety.
S. Reid	64.1	PPC84 in whole	Oppose	Delete PPC84 in its entirety and retain rural zone.
T. Hanna	67.1	PPC84 in whole	Oppose	Amend – no further information provided.
W. & F. MacLennan	70.1	PPC84 in whole	Oppose	Delete PPC84 in its entirety unless the requested amendments as below are achieved.
Y. Reid.	73.1	PPC84 in whole	Oppose	Delete PPC84 in its entirety and retain rural zoning.