

13 February 2026

Attn: Housing and Code of Practice Plan Change (Plan Change 2)
Invercargill City Council
Private Bag 90104
Invercargill

Submission by email via: planning@icc.govt.nz

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON THE
NOTIFIED PROPOSED PLAN CHANGE 2 TO THE INVERCARGILL
CITY DISTRICT PLAN UNDER CLAUSE 6 OF SCHEDULE 1 OF THE
RESOURCE MANAGEMENT ACT 1991**

**This is a submission by Kāinga Ora - Homes and Communities (“Kāinga Ora”) on the
Proposed Housing and Code of Practice Plan Change (Plan Change 2) from
Invercargill City Council (“the Council”) to the Invercargill City District Plan:**

Kāinga Ora does not consider it can gain an advantage in trade competition through this submission. In any event, Kāinga Ora is directly affected by an effect of the subject matter of the submission that:

- Adversely affects the environment; and
- Does not relate to trade competition or the effects of trade competition.

The specific provisions of the proposal that this submission relates to is PC2 in its entirety.

The Kāinga Ora submission is:

1. Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) is a Crown Entity and is required to give effect to government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
 - a) Provide people with good quality, affordable housing choices that meet diverse needs; and
 - b) Support good access to jobs, amenities, and services; and
 - c) Otherwise sustain or enhance the overall economic, social, environmental, and cultural well-being of current and future generations.
2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing within Invercargill City.
3. Kāinga Ora therefore has an interest in Plan Change 2 and how it:
 - i. Minimises barriers that constrain the ability to deliver public and affordable housing development across the city; and
 - ii. Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. Whilst overall, Kāinga Ora is supportive of PC2, the following amendments to the plan change are sought to ensure that Plan methods, including rules and assessment framework are suitably enabling of development that is desired by the objectives and policies of the Plan:
5. **Code of Practice** – Kāinga Ora supports deleting references to the expired Invercargill City Council Bylaw 2016 and updating the references to the Code of Practice for Subdivision, Land Use, and Development, which sits outside the District Plan.
6. **Definitions** – Kāinga Ora seeks that the definition for ‘Medium Density Housing’ is deleted. Kāinga Ora considers that medium density housing is adequately covered by the notified provisions of the Residential 1A (Medium Density) zone, subject to the relief sought in this submission.

7. **Residential Overview** – Kāinga Ora supports the objectives and policies within the Residential Overview in that they encourage housing choice and affordability, as well as well-functioning urban environments in accordance with the NPS-UD.

8. **Residential 1 Zone** –

- i. Kāinga Ora is supportive that the new urban design guidance prepared by Council sits outside the district plan. Kāinga Ora however considers that policy RES1Z-P3 is too prescriptive and reads more as assessment criteria and therefore seeks amendments to the policy to provide clearer direction to achieve the intended outcomes.
- ii. Kāinga Ora seeks to remove the density provisions that are based on area within the Residential 1 Zone and instead allow for up to two dwellings as a permitted activity. Further, Kāinga Ora seeks that more than three dwellings per site is assessed as a restricted discretionary activity with public and limited notification precluded. Kāinga Ora considers that the notified development and performance standards are adequate to control good quality urban form and manage density appropriately.

9. **Residential 1A Zone** –

- i. Kāinga Ora supports RES1AZ-O3 as notified to increase housing stock through medium density redevelopment. Kāinga Ora also supports the “Height of Buildings and Structures” rule in providing design variation while managing the effects on adjacent properties.
- ii. Kāinga Ora seeks the following changes to the standards to provide for efficient built form outcomes and for design flexibility whilst maintaining the residential amenity of adjoining sites:
 - a) Activity statuses - Kāinga Ora seeks that non-compliance with any rule (subject to the amendments sought in this submission) within the zone be assessed as a Restricted Discretionary Activity, rather than as a Discretionary Activity. Kāinga Ora notes that this is more proportionate with the level of effects and that clear matters of discretion provide good guidance for urban form. Kāinga Ora notes that Council has already provided appropriate matters of consideration under each rule which can be utilised when Council is restricting its matters of discretion.

- b) Residential density - Kāinga Ora seeks to delete the notified residential density rules as they are overcomplicated. Kāinga Ora considers that the intended urban form within the zone can be achieved through the rule RES1AZ-R5 - Number of Residences Per Site.
- c) Number of units per site – Kāinga Ora supports using the number of units as a method of managing the effects of medium density development but seeks that both public and limited notification are precluded for four or more units. Kāinga Ora also seeks replacement of the word ‘residences’ with ‘units’ and ‘residential units’ as these words are more commonly used and easier for plan-users to understand. Kāinga Ora opposes universal design and acoustic privacy as matters of discretion as they are best addressed under the Building Act.
- d) Outdoor living – Kāinga Ora seeks that communal outdoor living spaces are assessed as a mitigation measure for not meeting private outdoor living space requirements only in instances where they are proposed. It notes that communal outdoor living spaces may be suitable for larger scale developments but not functionally appropriate for smaller scale developments.
- e) Space around dwellings – Kāinga Ora seeks that the proposed side and rear setbacks are amended from 1.5m to 1m to provide for design flexibility whilst ensuring buildings are sufficiently setback to maintain the residential amenity of adjacent sites.
- f) Site coverage – Kāinga Ora seeks to simplify the rule and considers that a maximum permitted site coverage of 50% instead of 45% is reasonable for medium density developments to achieve the anticipated built form of the zone.
- g) Permeable surfaces – Kāinga Ora seeks a minimum 20% threshold for site permeability instead of 30%. It considers that the permeable surfaces threshold should be reduced in line with other performance standards in the RES1A zone.
- h) Outlook and glazing – Kāinga Ora supports the outlook standards but seeks to delete the glazing standards. Kāinga Ora considers that the

glazing standards may result in designs that are functionally inappropriate and which do not achieve the intended outcomes of the rule.

10. **Subdivision** – Kāinga Ora seeks that it is made clear that minimum allotment sizes and dimensions only apply to subdivision which results in ‘vacant’ allotments. It seeks that no minimum allotment size should apply to any allotment created around residential units for which resource consent has been granted. Kāinga Ora considers that both public notification and limited notification should be precluded under Rule SUB-R3, as the effects are dealt with under the land use consent.

11. The changes sought are made to:

- i. Ensure that Kāinga Ora can carry out its statutory obligations;
- ii. Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991, and relevant national direction and regional alignment;
- iii. Ensure that the s32 analysis has appropriately analysed and considered other reasonable options to justify the proposed plan provisions;
- iv. Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
- v. Provide clarity for all plan users; and
- vi. Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.

12. The Kāinga Ora submission points and changes sought can be found within Table 1 of **Appendix 1** which forms the bulk of the submission.

Kāinga Ora seeks the following decision from Invercargill City Council:

That the specific amendments, additions, or retentions which are sought as specifically outlined in **Appendix 1**, with text changes shown in red and are struck through or underlined, are accepted and adopted into the Operative Invercargill City District Plan including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

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

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its submission on Plan Change 2 on the Invercargill City District Plan to address the matters raised in its submission.


Brendon Liggett

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Kāinga Ora – Homes and Communities

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Appendix 1: Decisions sought on Plan Change 2 to the Invercargill City District Plan

The following table sets out the amendments sought to Plan Change 2 to the Invercargill City District Plan and also identifies those provisions that Kāinga Ora supports.

Notified changes by Invercargill City Council to the District Plan as part of Plan Change 2 are shown as ~~strikethrough~~ for deletion and underlined for additional text.

Proposed changes by Kāinga Ora are shown as ~~strikethrough~~ for deletion and underlined for additional text.

Table 1

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
Definitions					
1.	DEF: Definitions	Code of Practice for Land Development and Subdivision Infrastructure	Support	Kāinga Ora supports deleting 'Code of Practice for Land Development and Subdivision Infrastructure' from the definitions as the 2016 Code of Practice has been replaced with the updated Code of Practice which is referenced elsewhere in the notified provisions.	<i>Delete definition as notified.</i>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought				
2.	DEF: Definitions	Medium Density Housing	Oppose	Kāinga Ora opposes this definition, including a specific density being within the definition as it reads as a rule. Kāinga Ora considers that medium density housing is adequately covered by the notified provisions of the Residential 1A (Medium Density) Zone, subject to the relief sought in this submission, and that a definition is not necessary.	Delete definition in its entirety: <table><tr><th>Term</th><th>Definition</th></tr><tr><td>Medium Density Housing</td><td>Means comprehensive housing developments including four or more dwellings with density of less than 350m² per unit. It can include stand alone dwellings, semi detached (or duplex) dwellings, terraced housing or apartments within a building of two storeys or less. These can be located on either single or aggregated sites, or as part of larger master planned developments detached, semi detached, terraced housing, and low rise apartment on allotments, sites or areas of less than 350m² per residence.</td></tr></table>	Term	Definition	Medium Density Housing	Means comprehensive housing developments including four or more dwellings with density of less than 350m ² per unit. It can include stand alone dwellings, semi detached (or duplex) dwellings, terraced housing or apartments within a building of two storeys or less. These can be located on either single or aggregated sites, or as part of larger master planned developments detached, semi detached, terraced housing, and low rise apartment on allotments, sites or areas of less than 350m ² per residence.
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Subdivision									
3.	SUB: Subdivision	Overview	Support	Kāinga Ora supports the amendments to refer to the most up-to-date Code of Practice.	Retain as notified.				

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
4.	SUB: Subdivision	SUB-R3	Oppose in part	Kāinga Ora seeks to add the word 'vacant' to clarify that the minimum lot sizes and dimensions only apply to vacant lot subdivision. Kāinga Ora does not consider that a minimum allotment size should apply to any allotment created around residential units for which resource consent has been granted. Kāinga Ora seeks amendments to SUB-R3 to reflect this. Kāinga Ora considers that both public notification and limited notification should be precluded under Rule SUB-R3, as the effects are dealt with under the land use consent.	<i>Amend as follows:</i> <u>SUB-R3</u> The following subdivision activities are <u>restricted discretionary activities</u>: <u>1.</u> <u>Within the Residential 1 Zone:</u> <u>Vacant a</u><u>llotments of equal to or greater than 350m² but less than 400m² or more where:</u> a. <u>Every allotment must be capable of containing an area with minimum dimensions of 15m x 15m</u> <u>2.</u> <u>Within the Residential 1A Zone:</u> a. <u>Vacant a</u><u>llotments of equal to or greater than 300m² where;</u> i. <u>Every allotment must be capable of containing an area with minimum</u>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<u>dimensions of 12m x 12m</u> 3. <u>b. Allotments of equal to or greater than 200m² but less than 300m² Subdivision in accordance with an approved land use consent shall have no minimum allotment size where:</u> <u>i. a. A land use consent under RES1Z-R5 to RES1Z-27 or RES1AZ-R3 to RES1AZ-R32 has been granted, or is applied for concurrently with the subdivision consent;</u> <u>or</u> <u>ii. The subdivision does not create any vacant allotments.</u> Advice Note: Any application arising from SUB-R3 is precluded from public and limited notification. <u>but may be limited notified.</u>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
Residential					
5.	RES: Residential Overview	Overview	Support	Kāinga Ora supports the notified amendments, such as the inclusion of “well-functioning urban environments” in line with NPS-UD.	<i>Retain as notified.</i>
6.	RES: Residential Overview	RES-O1	Support	Kāinga Ora supports the notified amendments, in particular the inclusion of “medium density is enabled” to support housing choice and affordability.	<i>Retain as notified.</i>
7.	RES: Residential Overview	RES-O2	Support	Kāinga Ora supports the notified amendments, enabling diversity in housing types and “built forms”.	<i>Retain as notified.</i>
8.	RES: Residential Overview	RES-O3	Support	Kāinga Ora supports the removal of “high standard” for residential amenity, which recognises that providing this may impose additional costs on landowners and	<i>Retain as notified.</i>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
				developers and thereby reduce housing affordability. Kāinga Ora supports the addition of “in accordance with the anticipated outcomes and characters of the zone” which recognises the changing nature of the residential environment while providing for residential amenity.	
9.	RES: Residential Overview	RES-P2	Support	Kāinga Ora supports providing for a range of housing densities and built forms to provide for housing choice and affordability.	<i>Retain as notified.</i>
10.	RES: Residential Overview	RES-P4	Support	Kāinga Ora supports the notified policy in line with RES-O3.	<i>Retain as notified.</i>
11.	RES1: Residential 1 Zone	RES1Z-O5	Support	Kāinga Ora supports the amendment from “high quality urban design” to “good quality urban design” to allow for more efficient	<i>Retain as notified.</i>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
				and effective outcomes and encourage housing affordability.	
12.	RES1: Residential 1 Zone	RES1Z-P1	Oppose in part	Kāinga Ora seeks removal of the minimum lot size and seeks replacement by number of units as a more simplified approach for managing density and enabling good urban form. Kāinga Ora notes that much of the urban environment of Invercargill is zoned Residential 1 Zone, which is similar to 'General Residential Zone' under the National Planning Standards 2019. Therefore, removal of the term 'suburban' is sought. Kāinga Ora seeks to incorporate RES1Z-P5 into this policy.	<i>Amend as follows:</i> RES1Z-P1 Residential 1 Zone: To provide for <u>general residential living and housing choices by:</u> ~~suburban residential development by zoning within the existing urban area for dwellings on lots 400m² in size or larger.~~ <u>1. Permitting two dwellings per site.</u> <u>2. Allowing more dwellings per site when buildings are well designed to give effect to other relevant Objectives and Policies of the Residential 1 Zone.</u> <u>3. Encouraging medium density housing within the Residential 1A Zone, and in the Residential 1B Zone.</u> <i>Explanation:</i>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<i>The following considerations favour minimising peripheral expansion of the built-up area:</i> <i>1. As a compact City originally planned on a grid street system, Invercargill enjoys the advantages of convenience, accessibility and short travel times. This could be compromised by sporadic peripheral expansion.</i> <i>2. The current housing stock contains a significant proportion of dwellings built prior to 1930, particularly south of Tay Street. Many are obsolete in terms of current health standards and expectations and the best option in many cases is renewal and infill development. Renewal may be delayed or not occur if there are more convenient development opportunities elsewhere.</i> <i>3. To the north of the current built up area are highly versatile soils which in the long term should not be alienated from their potential to grow food. The ability to grow food locally may well be an important dimension to long term sustainability.</i>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					4. <i>Population projections indicate that the rate of growth will at best be slow, and at worst population decline is a possibility. The age distribution inevitably will become older. Keeping the infrastructure of the City affordable is an issue. Unnecessary extensions to services that are expensive long term to maintain should be avoided.</i> 5. <i><u>Lots 400m² and larger can offer the desired level of amenity for general residential living in Invercargill. Housing on smaller lots needs to be designed comprehensively to achieve satisfactory levels of amenity. Well-designed detached, semi-detached, and attached housing are encouraged where they provide a quality living environment for residents.</u></i>
13.	RES1: Residential 1 Zone	RES1Z-P3	Support in part	Kāinga Ora considers that the policy is too prescriptive and reads more as assessment criteria, noting that it is repeated under notified rule RES1AZ-R7. Therefore, Kāinga Ora seeks amendments to the policy to provide clearer direction as to how the	<i>Amend as follows:</i> RES1Z-P3 Urban Design: To <u>provide for encourage a range of residential buildings and structures including additions and alterations that good urban design in terms of:</u>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
				relevant objective can be met. Kāinga Ora supports the urban design guidance sitting outside the district plan.	1. Provide healthy, sustainable and accessible living environments; 2. Are compatible with the built environment anticipated in the Residential Zone; 3. Contribute positively to a changing urban environment; 4. Achieve safe and attractive streets. 1. ~~Context~~ 2. ~~Character~~ 3. ~~Choice~~ 4. ~~Connections~~ 5. ~~Creativity~~ 6. ~~Custodianship~~ 7. ~~Collaboration.~~ 1. ~~Neighbourhood context~~

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					2. ~~Site layout~~ 3. ~~Building design, including consideration of universal design~~ 4. ~~Entries to buildings~~ 5. ~~Visual and acoustic privacy~~ 6. ~~Outdoor living space~~ 7. ~~Access and parking~~ 8. ~~Landscape treatment~~ 9. ~~Site facilities~~ Explanation: Promoting good urban design in the suburban areas of the City is an important part of reinforcing their function as the City's day to day living spaces. <u>Urban</u>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<u>design guidance from Council is available to help inform applications for medium density developments. There are seven essential design qualities:</u> 1. ~~Context:~~ ~~Seeing that buildings, places and spaces are part of the whole town or City.~~ 2. ~~Character:~~ ~~Reflecting and enhancing the distinctive character, heritage and identity of our urban environment.~~ 3. ~~Choice:~~ ~~Ensuring diversity and choice for people.~~ 4. ~~Connections:~~ ~~Enhancing how different networks link together for people.~~

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					~~5. Creativity: Encouraging innovative and imaginative solutions.~~ ~~6. Custodianship: Ensuring design is environmentally sustainable, safe and healthy.~~ ~~7. Collaboration: Communicating and sharing knowledge across sectors, professions and with communities.~~
14.	RES1: Residential 1 Zone	RES1Z-P5	Oppose in part	Kāinga Ora opposes the stepped approach of density restrictions through minimum section sizes. Kāinga Ora has integrated this policy into RES1Z-P1, therefore seeks this policy to be deleted.	Delete policy in its entirety as follows: ~~RES1Z P5 Choice: To enable the development of a range of housing types by:~~ ~~1. Allowing, as of right, development on sections exceeding 400m²;~~ ~~2. Allowing development on sections between 350m² and 400m² when buildings are well designed to give effect to~~

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					other relevant Objectives and Policies of the Residential 1 Zone. 3. Encouraging ~~comprehensively designed~~ medium density housing development within ~~specified parts of the Residential 1 Zone by way of resource consent in the Residential 1A Zone, and by way of performance standards in the Residential 1B Zone where performance standards can be met.~~ Explanation: <i>Invercargill's ageing population, decreasing average household size and the evolving settlement pattern of the District and region all mean that provision needs to be made for a variety of housing types. Single-family housing in Invercargill is typically on sites 650–1,000m² in size. Market-driven redevelopment in Invercargill often takes the form of subdivision of existing, larger sites and erection of new residential units on the newly subdivided sites. Single unit residential development can be designed to provide good levels of amenity on sites down to 400m². When sites are smaller than 400m², amenity for both the subject property and its neighbours tends to suffer if</i>

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					~~poorly designed, and development of residential units on smaller sites needs to be comprehensively designed.~~ <u>Well-designed detached, semi-detached, terraced housing and low-rise apartments are encouraged where they provide a high-quality living environment for residents.</u>
15.	RES1: Residential 1 Zone	RES1Z-P7	Oppose in part	Kāinga Ora seeks that the site coverage is increased to 50% for Residential 1A zone as per the relief sought in RES1AZ-R16 below.	<i>Amend as follows:</i> RES1Z-P7 Space Around Buildings: To maintain the residential scale and amenity of space around and between buildings. Explanation: <i>The proportion of the site covered by buildings is an important determinant of residential amenity. This can reduce significantly on the property and on adjoining properties if more than around 40% ~~or 45%~~ 50% (in the <u>Residential 1A Zone</u>) of the site is covered in buildings. Excessive building coverage has other undesirable effects, such as overloading the City's stormwater reticulation system.</i>

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16.	RES1: Residential 1 Zone	RES1Z-R5 to RES1Z-R8 Residential Density	Oppose in part	Kāinga Ora opposes the minimum density proposed and considers that the tiered density approach is overcomplicated. Kāinga Ora seeks replacement of the minimum density with number of units and management of outcomes through meeting the performance standards and matters of discretion under R8. Kāinga Ora seeks that both public and limited notification are precluded for 3 or more units as s95 notification assessment will be carried out for non-compliance with performance standards.	<i>Amend as follows:</i> Residential Density <u>Number of Units Per Site</u> RES1Z-R5 The maximum ~~residential density is:~~ <u>number of residential units permitted per site is 2.</u> 1. ~~One residence per 400m² under contiguous ownership~~ 2. ~~One residence per Record of Title existing as at 29 October 2016 where the site is less than 400m².~~ RES1Z-R6 ~~Where the residential density is one residence on a site equal to or greater than 350m² but less than 400m² and under contiguous ownership then it is 3 or more residential units per site is a~~ <u>restricted</u> discretionary activity. Advice Note: ~~Any application arising from this rule is precluded from public and limited notification but may be limited notified.~~ RES1Z-R7 ~~Where the residential density is one residence on a site less than 350m² under contiguous~~

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					ownership then it is a ~~non-complying~~ discretionary activity. RES1Z-R8 For applications under RES1Z-R6 the following are the matters over which the Council shall restrict its discretion; and for applications under RES1Z-R7 above shall address the following matters, which will be among those taken into account by the Council: 1. Provision of private open space 2. Incidence of daylight and sunlight 3. <i>[Removed as directed by the National Policy Statement on Urban Development 2020, 11 May 2021]</i> 4. Effects of the proposal on the incidence of daylight and sunlight on adjoining properties 5. Effects of the proposal on stormwater flows 6. The extent to which the development achieves good urban design outcomes.

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17.	RES1AZ: Residential 1A (Medium Density) Zone	Overview	Oppose in part	Kāinga Ora seeks amendments to the zone overview to align with the 'Medium Density Residential Zone' description under the National Planning Standards 2019, and to recognise the benefits of providing medium density housing.	<i>Amend as follows:</i> Overview The Residential 1A Zone provides <u>residential activities with moderate concentration and bulk of buildings, such as detached, semi-detached and terraced housing, low-rise apartments, and other compatible activities.</u> ~~medium density housing to be developed comprehensively on appropriately sized sites. The nature of medium density housing means that housing units may be built on very small individual lots, and in this situation amenity can best be provided by through good urban design, and especially for larger scale developments, planning the development comprehensively.~~ By making provision for medium density housing ~~in this way~~, there will be an increase in the range of housing type choices available in Invercargill, and encourage the redevelopment of an area of the City with older housing.
18.	RES1AZ: Residential 1A (Medium Density) Zone	RES1AZ-I2	Support in part	Kāinga Ora notes that the word 'comprehensively' has been proposed by Council to be deleted from other provisions. Kāinga Ora seeks	<i>Amend as follows:</i> Issues

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				the same in this provision for consistency.	RES1AZ-I2 Medium density housing (<u>especially larger scale proposals of 4 or more units</u>) can lead to decrease in amenity unless <u>it is they are well-planned, and well designed, and larger scale proposals of 4 or more residences are developed comprehensively.</u>
19.	RES1AZ: Residential 1A (Medium Density) Zone	RES1AZ-O3	Support	Kāinga Ora supports this policy as notified to increase housing stock through medium density redevelopment.	<i>Retain as notified.</i>
20.	RES1AZ: Residential 1A (Medium Density) Zone	RES1AZ-O4	Support in part	Kāinga Ora seeks to retain the wording of “minimise adverse effects on the surrounding neighbourhood” as “providing good amenity to... the surrounding neighbourhood” is dependent on more than what occurs on-site and should not be the sole responsibility of the landowners / developers and a single site.	<i>Amend as follows:</i> RES1AZ-O4 <u>The Residential 1A (Medium Density Housing) Zone developments are is a well designed, higher density residential living environment which:</u> <u>1. Contains a range of housing typologies and built forms including detached, semi-detached, terraced housing, and low-rise apartments; and</u> <u>2. Provides good amenity to residents and minimising the adverse effects on offering a</u>

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				Kāinga Ora otherwise supports the notified objective.	high level of amenity to the residents in the new units and maximising beneficial effects, and minimising adverse effects, on the surrounding neighbourhood.
21.	RES1AZ: Residential 1A (Medium Density) Zone	RES1AZ-P1	Support in part	Kāinga Ora notes that the word ‘comprehensively’ has been proposed by Council to be deleted from other provisions. Kāinga Ora seeks the same in this provision for consistency. Kāinga Ora also notes that RES1A (Medium Density Housing) Zone has been identified on the district plan maps and should not have to meet the additional location requirements to be able to provide for medium density In regards to being “hazard-free and not subject to	<i>Amend as follows:</i> RES1AZ-P1 Residential 1A (Medium Density Housing) Zone: To provide for well-designed medium density housing ~~as a Discretionary Activity~~ in the Residential 1A Zone in locations ~~on~~ areas identified on the District Planning Maps ~~as hazard free and not subject to airport-related noise, and~~ ~~1. As a comprehensively planned development comprising multiple 4 or more residences~~ ~~2. Within approximately 450 metres (approximately five minutes’ walk) of the nearest zone boundary of the Business 2 Zone at South City~~ ~~3. Within approximately one kilometre (just over 10 minutes’ walk) of the City Centre Priority Redevelopment Precinct.~~ Explanation:

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				airport-related noise”, Kāinga Ora notes that other chapters within the district plan address this.	<i>Medium density housing ~~(housing on lots smaller than 350m²)~~ is an option for housing renewal that is particularly appropriate in inner-city areas where there are established facilities close by. It needs to be planned comprehensively in order to provide a satisfactory level of amenity.</i>
22.	RES1AZ: Residential 1A (Medium Density) Zone	RES1AZ-P2	Oppose	Kāinga Ora seeks deletion of this policy as it is repetitive of RES1Z-P3 applies to this zone, noting that the district plan specifies that “All Objectives and Policies that apply to the Residential 1 Zone also apply to the Residential 1A Zone.”	<i>Delete this policy in its entirety as follows:</i> ~~RES1AZ-P2 — Urban Design:~~ ~~To ensure that development is consistent with the anticipated outcomes and character of the Zone contained in Objective RES1AZ O4, To require that the following urban design issues be addressed in the design and planning of medium density housing:~~ ~~1. Neighbourhood context~~ ~~2. Site layout~~ ~~3. Building design, including consideration of universal design~~

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					~~4. Entries to buildings~~ ~~5. Visual and acoustic privacy~~ ~~6. Outdoor living space~~ ~~7. Access and parking~~ ~~8. Landscape treatment~~ ~~9. Site facilities~~ ~~1. Neighbourhood character – the relationship of the development with the surrounding neighbourhood and how well the development integrates with its neighbourhood.~~ ~~2. Connectivity – how the development links to the neighbourhood and the wider community~~ ~~3. Site layout – provision, orientation,~~

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					access, layout and function of outdoor spaces 4. ~~Building location—optimising amenity while making best use of the site, and also being a good neighbour~~ 5. ~~Relationship to neighbouring buildings~~ 6. ~~Visual and acoustic privacy—design to mitigate overlooking and unwanted noise~~ 7. ~~Where off street parking is provided, vehicle access and parking are convenient, adequate, and safe, but not dominant~~ 8. ~~On-site outdoor space—relationship of outdoor spaces to houses with respect to privacy, outlook, sunlight and landscape treatment~~ 9. ~~Entries to buildings—visibility, shelter~~

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					and security 10. ~~Site facilities provision for services and utilities~~ 11. ~~Landscape treatment design for quality living environment.~~ <i>Explanation:</i> <i>Achieving good development <u>urban design</u> will require designers to consider the design issues (above). <u>Urban design guidance from Council is available to assist applicants to design proposals that achieve good urban design.</u> and reach informed conclusions. Comprehensive design is needed to achieve the best outcomes on the small sites that characterise the completed development.</i>
23.	RES1AZ: Residential 1A (Medium Density) Zone	RES1AZ-R1 to RES1AZ-R4 Residential Density	Oppose	Kāinga Ora seeks to remove the minimum density requirements. The notified density rule is considered to be overly complicated and does not provide for the intended	Delete this rule in its entirety as follows: ~~RES1AZ R1 RES1Z R1 to RES1Z R4~~²⁵, which apply in the Residential 1 Zone, also apply in the Residential 1A Zone, except that ~~RES1Z R5 to RES1Z R8~~ do not apply in instances where applications are made pursuant to ~~RES1AZ R2~~.

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
				outcomes that the plan change is seeking. RES1AZ-R5 is sufficient in enabling more housing supply and choice to be provided for contributing to the housing supply and diverse housing needs of Invercargill residents. Kāinga Ora considers that the performance standards are adequate to provide for good quality urban form.	~~RES1AZ-R2 — Medium Density Housing developments are a discretionary activity on sites with a combined area of 2,000m² or more in contiguous ownership prior to development.~~ <u>Residential Density</u> ~~RES1AZ-R2 — The maximum residential density is one residence per 300m² under contiguous ownership.~~ ~~RES1AZ-R3 — Where the residential density is one residence per 200m² to 299m², under contiguous ownership, then it is a restricted discretionary activity.~~ <u>Advice Note:</u> Any application arising from this rule is precluded from public notification but may be limited notified. ~~RES1AZ-R4 — Where the residential density is one residence per 199m² or less, under contiguous ownership, then it is a discretionary activity.~~

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<u>Any application arising from this rule is precluded from public notification but may be limited notified.</u>
24.	RES1AZ: Residential 1A (Medium Density) Zone	RES1AZ-R5 Number of Residences Per Site	Support in part	Kāinga Ora supports using the number of units as a method of managing the effects of medium density development. Kāinga Ora considers that the words ‘units’ and ‘residential units’ are easier for plan-users to understand and more commonly used in district plans than ‘residences’. Kāinga Ora opposes universal design and acoustic privacy as these matters are best addressed under the Building Act.	<i>Amend as follows:</i> <u>Number of ~~Residences~~ Units Per Site</u> <u>RES1AZ-R5 The maximum number of permitted residential units per site is 3.</u> <u>RES1AZ-R6 4 or more residential units per site is a restricted discretionary activity.</u> <u>Advice Note: Any application arising from this rule is precluded from public and limited notification but may be limited notified.</u> <u>RES1AZ-R37 For applications under RES1AZ-R13 and R6 the following are the matters over which the Council shall restrict its discretion; and for applications under RES1AZ-R4 above shall address the following matters, which will be among those taken into account by the Council:</u>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<u>1. The extent to which the application achieves good urban design outcomes, including in relation to:</u> ~~1. Neighbourhood character~~ ~~2. Connectivity~~ ~~3. Site layout~~ ~~4. Building location~~ ~~5. Relationship to neighbouring buildings~~ ~~6. Visual and acoustic privacy~~ ~~7. Access to solar gain~~ ~~8. Car parking and vehicle access~~ ~~9. On-site outdoor space~~ ~~10. Entries to buildings~~

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					~~11. Outdoor storage and accessory buildings~~ ~~12. Landscaping~~ a. <u>Neighbourhood context</u> b. <u>Site layout</u> c. <u>Building design, including consideration of universal design</u> d. <u>Entries to buildings</u> e. <u>Visual and acoustic privacy</u> f. <u>Outdoor living space</u> g. <u>Access and parking</u> h. <u>Landscape treatment</u> i. <u>Site facilities</u> ~~2. 13.~~ <u>The provision of infrastructure</u>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					~~quantum of impermeable surface and measures undertaken to address stormwater issues~~ <u>3. Vehicle access and traffic impacts</u>
25.	RES1AZ: Residential 1A (Medium Density) Zone	RES1AZ-R8 to RES1AZ-R11 Outdoor Living	Oppose in part	Kāinga Ora seeks a restricted discretionary activity status rather than discretionary activity status for non-compliance with this rule, as it is more proportionate with the potential effects of non-compliance. Furthermore, Kāinga Ora opposes a Discretionary Activity pathway as this does not provide certainty and guidance that a Restricted Discretionary Activity approach provides and considers that clear matters of discretion (as notified)	<i>Amend as follows:</i> <u>Outdoor Living</u> <u>RES1AZ-R8 Residences at or near ground level: A designated area of outdoor living space is to be provided as follows:</u> <u>Has no dimension less than: 3m</u> <u>Minimum area of a single contiguous space: 20m²</u> <u>The space shall be directly accessible from a habitable room</u> <u>The space shall be free of all parking spaces, servicing areas, manoeuvring areas, and buildings, except for accessory buildings of no more than 3m² or conservatories,</u>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
				provide good guidance to enable good urban form. Kāinga Ora seeks that communal outdoor living spaces are assessed as a mitigation measure for not meeting private outdoor living space requirements only in instances where they are proposed. It notes that they may be suitable for larger scale developments but not functionally appropriate for smaller scale developments.	<u>where the total combined area of accessory buildings and conservatories is no more than 8m² and the space free of buildings has no dimension less than 3m.</u> RES1AZ-R9 <u>Residences located one or more stories above the ground floor: A balcony is to be provided as follows:</u> <u>Minimum area of a single contiguous space: 8m²</u> <u>Minimum horizontal dimension: 1.8m</u> <u>The balcony shall be directly accessible from a habitable room</u> RES1AZ-R10 <u>Where an activity does not comply with RES1AZ-R8 and/or RES1AZ-R9 above, the activity is a restricted discretionary activity.</u> RES1AZ-R11 <u>Applications under RES1AZ-R10 above shall address the following matters, which will be among those taken into account by</u>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<u>the Council over which Council will restrict its discretion:</u> <u>The extent to which practicable outdoor living is achieved</u> <u>Access to acceptable levels of daylight and sunlight</u> <u>The extent to which a designated outdoor living space not meeting RES1AZ-R8 and/or RES1AZ-R9 is mitigated by communal outdoor living space <u>where this is proposed.</u></u> <u>The extent to which the development achieves good urban design outcomes</u>
26.	RES1AZ: Residential 1A (Medium Density) Zone	RES1AZ-R12 to RES1AZ-R15 Space Around Buildings	Oppose in part	Kāinga Ora seeks 1m side and rear setbacks. This will provide for design flexibility whilst ensuring buildings are sufficiently setback to maintain the residential amenity of adjacent sites.	<i>Amend as follows:</i> <u>Space Around Buildings</u> <u>RES1AZ-R12</u> <u>A yard at least 2 metres deep shall be provided along the front (road) boundary of the site</u>

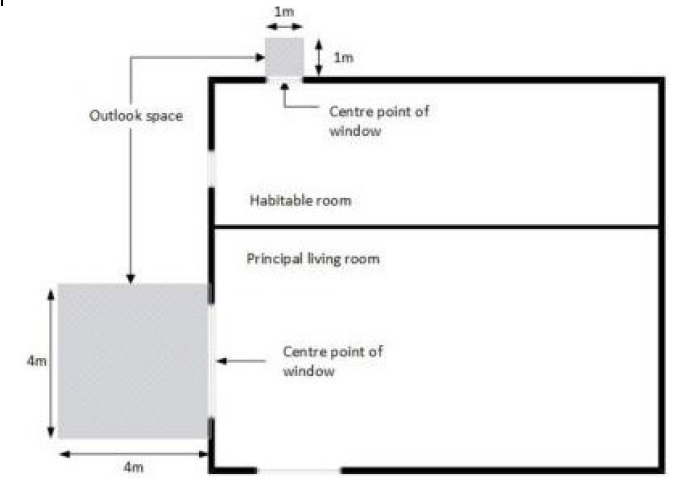
ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
				Kāinga Ora seeks restricted discretionary activity status rather than discretionary activity status for non-compliance with this rule, as it is more proportionate with the potential effects of non-compliance. Furthermore, Kāinga Ora opposes a Discretionary Activity pathway as this does not provide certainty and guidance that a Restricted Discretionary Activity approach provides and considers that clear matters of discretion (as notified) provide good guidance to enable good urban form.	2. <u>A yard of at least ~~4.5~~ 1 metre deep shall be provided along all other boundaries of the site.</u> <u>These yards may include part of the outdoor living space required under RES1AZ-R8 or RES1AZ-R9. Except that RES1AZ-R12 does not apply to common walls.</u> RES1AZ-R13 <u>A yard at least 4 metres deep shall be provided along all side and rear boundaries of any site containing a non-residential activity.</u> RES1AZ-R14 <u>Where an activity does not comply with RES1AZ-R12 or RES1AZ-R13, the activity is a restricted discretionary activity.</u> RES1AZ-R15 <u>Applications under RES1AZ-R14 above shall address the following matters, which will be among those taken into account by the Council over which Council will restrict its discretion:</u> 1. <u>Access to daylight and sunlight within buildings and outdoor living</u>

ID	Section of Plan	Specific Provision	Support/Support in part/Oppose in part/Oppose	Reasons	Relief Sought
					<u>spaces on the site and on neighbouring properties</u> 2. <u>Effects on amenities of neighbouring properties, including privacy</u> 3. <u>The extent to which the development achieves good urban design outcomes.</u>
27.	RES1AZ: Residential 1A (Medium Density) Zone	RES1AZ-R16 to RES1AZ-R19 Site Coverage	Oppose in part	Kāinga Ora seeks to simplify this rule and considers that a site coverage of 50% is reasonable for medium density developments to achieve the anticipated built form of the zone. Kāinga Ora seeks restricted discretionary activity status rather than discretionary activity status for non-compliance with this rule, as it is more proportionate with the potential effects of non-compliance.	<i>Amend as follows:</i> <u>Site Coverage</u> <u>RES1AZ-R16</u> <u>Maximum coverage of all buildings on the site shall not exceed ~~45~~50% of net site area.</u> <u>RES1AZ-R17</u> <u>Where the coverage of all buildings on the site exceeds 45% but does not exceed 50% of the net site area then it is a discretionary activity.</u> <u>RES1AZ-R18</u> <u>Where the coverage of all buildings on the site exceeds 50% then it is a restricted discretionary non-complying activity.</u>

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				Furthermore, Kāinga Ora opposes a Discretionary Activity pathway as this does not provide certainty and guidance that a Restricted Discretionary Activity approach provides and considers that clear matters of discretion (as notified) provide good guidance to enable good urban form.	<u>RES1AZ-R198 Applications under RES1AZ-R17 or RES1AZ-R18 above shall address the following matters, which will be among those taken into account by the Council over which Council will restrict its discretion:</u> <u>The extent of impermeable surfaces which must be drained via the City's stormwater collection system</u> <u>The extent to which solar gain to the indoor living areas is achieved</u> <u>The extent to which practicable outdoor living is achieved</u> <u>The extent to which the development achieves good urban design outcomes</u> <u>Effects of the proposal on the incidence of daylight and sunlight on the site and on adjoining properties</u>

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28.	RES1AZ: Residential 1A (Medium Density) Zone	RES1AZ-R20 to RES1AZ-R21 Height of Buildings and Structures	Support	Kāinga Ora supports this rule in providing for design variation, while managing the height of buildings and potential effects on adjacent properties.	<i>Retain as notified.</i>
29.	RES1AZ: Residential 1A (Medium Density) Zone	RES1AZ-R22 to RES1AZ-R24 Permeable Surfaces	Oppose in part	Kāinga Ora considers that the permeable surfaces rule in the RES1A zone should be more enabling than in the RES1 zone and that minimum 20% is an appropriate threshold. Kāinga Ora seeks restricted discretionary activity status rather than discretionary activity status for non-compliance with this rule, as it is more proportionate with	<i>Amend as follows:</i> <u>Permeable Surfaces</u> RES1AZ-R22 The minimum area of permeable surface is <u>320% of the gross site area.</u> RES1AZ-R23 Where the area of permeable surface is to be less than <u>320% of the gross site area</u>, then the activity is a <u>restricted discretionary activity.</u> RES1AZ-R24 Applications under RES1AZ-R23 above shall address the following matters, which will be among those taken into account by

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				the potential effects of non-compliance. Furthermore, Kāinga Ora opposes a Discretionary Activity pathway as this does not provide certainty and guidance that a Restricted Discretionary Activity approach provides and considers that clear matters of discretion (as notified) provide good guidance to enable good urban form.	<u>the Council:</u> <u>Alternative methods of slowing stormwater runoff from the site</u> <u>Measures to address the effects of stormwater contamination</u>
30.	RES1AZ: Residential 1A (Medium Density) Zone	RES1AZ-R25 to RES1AZ-R29 Outlook and Glazing	Oppose in part	Kāinga Ora supports the outlook standards but opposes the inclusion of the glazing standards. Kāinga Ora considers that the rule may result in designs that are functionally inappropriate and which do not achieve the intended outcomes of the rule.	<i>Amend as follows:</i> <u>Outlook and Glazing</u> <u>RES1AZ-R25</u> All habitable rooms shall have minimum outlook space of at least: <u>4m in depth and 4m in width, for principal living rooms</u> <u>1m in depth and 1m in width, for other</u>

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					<u>habitable rooms</u>  RES1AZ-R26 Outlooks spaces must: 1. <u>Be measured from the centre point of the largest window of the habitable room</u> 2. <u>Be clear and unobstructed by buildings and not extend over an</u>

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					<u>outlook space or outdoor living space required by another residence</u> RES1AZ-R27: For activities that do not comply with RES1AZ-R25 and/or RES1AZ-R26, the activity is a restricted discretionary activity. <u>The matters over which the Council shall exercise its discretion are:</u> <u>1. The ability of the affected habitable room to receive daylight</u> <u>2. The extent to which habitable rooms have an outlook and sense of space</u> <u>3. The extent to which visual privacy is provided between habitable rooms of different residential units, on the same or adjacent sites</u> <u>4. The extent to which the development achieves good urban design outcomes</u> ~~RES1AZ R28—Street facing units must have a minimum of 20% of the street facing façade in glazing.~~ <u>This can be in the form of windows or doors.</u>

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					<u>~~RES1AZ R29: For activities that do not comply with RES1AZ R28, the activity is a restricted discretionary activity.~~</u> <u>~~The matters over which the Council shall exercise its discretion are:~~</u> <u>~~The extent to which the development achieves good urban design outcomes, including whether the development provides an active frontage which positively engages with the street, contributing to a visually interesting, vibrant and safe neighbourhood.~~</u>