

Housing and Code of Practice Plan Change to the Invercargill City District Plan (Plan Change 2)

About this Summary of Submissions

This summary of decisions requested summarises submissions on Plan Change 2

The submissions received are summarised by ‘submitter’ and by ‘topic’ in the below tables

All submissions have a unique number e.g. ‘01.01’ – the first number is the submitter number, and the second number is the submission point number. E.g. ‘01.01’, is submission point 1 of submission 1.

Where a submitter has requested additions, these are shown in blue double underlined text, with deletions shown in ~~blue double strikethrough text~~

As this is a summary only, submissions should be referred to in full

The names of Acts, Regulations, Policies, Plans and Plan Changes have been abbreviated for brevity

Late submissions are marked with an *

Summary of Submissions by Submitter

Submitter	Number	Topic	Sub-Section	Provision	Position	Submission Point Summary	Relief/ Decision Sought
Southland Community Housing Group	01.01	Whole plan change			Support	Aware of a shortage of affordable housing for those on low incomes. Currently 177 households are on the Housing Register for Invercargill seeking a state house, this involves around 300 individuals with a chronic housing need. The highest category are single people. Invercargill's housing stock on average contains larger and older homes than the NZ average and affordable, high quality smaller homes are very hard to acquire. The proposed changes will enable many more smaller homes to be built. Aware that many more households have housing needs, but are not on the housing register. Most who are seeking housing are elderly or low income families and being close to key amenities is very important. The specific zones outlined will allow most new housing enabled by the rule changes to meet this important criteria. Currently Invercargill is one of the few cities experiencing an increase in property values as demand outstrips supply. However, property values are relatively low and, with rising construction costs, the changes will provide greater incentives for developers to build more houses. Given the circumstances of many of those seeking housing, large sections are not a priority, so smaller sections for each housing unit is not a negative issue. Brown field developments are less costly, don't require new public transport routes or amenities and don't impinge on productive rural land.	Accept all the proposed changes to the District Plan.
Sarah Robertson	02.01	Whole plan change			Oppose	Seen the way this has changed larger cities, and do not want Invercargill to become like them - it will result in a shift in the culture of the city.	Don't allow this to proceed. Pull down some of the more derelict house in Appleby, Strathern, Kew, Clifton, etc, which have the larger sections, and subdivide into 500m ² land, and build on those. To build medium density housing, especially in the city, will create a high density living which will ruin the city.
Vinay Andrades	03.01	Whole plan change			Support	Development costs to be passed on to developer, not rate payer.	Development costs to be passed on to developer, not rate payer.
Janet	04.01	Whole plan change			Oppose	The provisions are inappropriate for Invercargill’s local context and may result in unintended adverse effects. Concerned that the proposed approach does not adequately reflect local character, infrastructure capacity, development feasibility, or community outcomes, and that the provisions may impose unnecessary costs and constraints. Opposes the specific provisions, except where amendments are made as outlined in this submission. The proposed provisions are not appropriately tailored to Invercargill’s local context, including existing neighbourhood character, infrastructure capacity, and growth patterns. The housing provisions and Code of Practice, may impose unnecessary and disproportionate development requirements that increase costs without delivering clear environmental or community benefits. There is insufficient flexibility within the provisions to allow for practical, site-specific	Decline PC2 in its entirety. Alternatively, if the Council is not prepared to decline the plan change, the submitter seeks that the Council amend PC2 to better reflect Invercargill’s local character and infrastructure constraints, provide greater flexibility and clarity in the application of standards and the Code of Practice, and remove or revise provisions that add cost without demonstrable benefit.

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						solutions that can manage effects while still enabling appropriate development. The proposed approach risks unintended consequences for housing affordability and development viability within Invercargill. The provisions may create uncertainty by operating the Code of Practice as an additional regulatory layer rather than as enabling guidance.	
John Gerty	05.01	Zones	Rezoning		Support in part	Support this but think the southern boundary should run down to the hospital especially on Elles Road as the shops and buses would benefit from the extra people. The housing stock is too old and poor quality here so it needs encouragement to develop.	Expand the zones by extending the southern boundary to run down to the hospital especially on Elles Road.
Colin Bishop	06.01	Zones	Rezoning		Support in part	Partly support PC2 but recommend that it be amended to include some areas currently zoned Rural, that are on the very edge and in some cases surrounded by Residential 1 zoned properties, be rezoned to Residential 1 zoning to enable greater density and diversity of housing choice in the Residential 1 zone. The east side of Bain Street between Stirrat Street and Ball Street is one such area. The west side of Bain Street is zoned Residential 1. Over 50% of the east side of Bain Street is also zoned Residential 1. The Balance of the properties on the East side of Bain Street are zoned Rural. This area has reticulated sewage/stormwater and reticulated drinking water, is within easy walking distance of South City, early childhood centres and schools. If the east side of the street that is currently zoned rural is changed to Residential it will enable greater density and diversity of housing choice which is the main purpose of the planning change proposed. While allowing more intensive housing in Residential zones 1 and 1A is one option there are places currently zoned rural that are adjacent to Residential zone 1 properties and in some cases on three sides that could be changed to Residential zone 1.	Amend PC2 to rezone the properties zoned rural along the east side of Bain Street between Stirrat Street and Ball to Residential 1.
Bruce Halligan	07.01	Whole plan change			Support	This will assist with provision of further housing close to the CBD and will mitigate the potential for further urban sprawl into productive land on the fringes of the city.	Proceed with the plan change.
Sharon R. Anaru Hill	08.01	Zones	Residential 1A Zone		Oppose	Oppose Zone 1A being part of the changes proposed. The re-zoning for higher density in this zone will take away the sense of community and put extra pressure on resources and safety long term.	Remove area 1A from the change to higher density or at the very least do a finer catchment of it.
Sarjana Duwal	09.01	Whole plan change			Support	Ther provisions enable increased housing density and diversity within the Residential 1 and 1A Zones, support well-designed medium density housing close to the CBD, and update references to the current Code of Practice to ensure consistency with contemporary development standards. PC2 enables increased housing density and a greater diversity of housing types within the Residential 1 and 1A Zones, helping to address identified unmet demand for medium density housing close to the CBD. The changes provide appropriate planning flexibility while promoting good urban design and align the District Plan with the current Code of Practice. This decision is sought because the current housing market in Invercargill makes it difficult for new homeowners to afford or access modern, well-designed homes. Many purchasers, including myself, are forced to buy older houses that require significant ongoing maintenance and costly renovations.	Adopt PC2 as notified, including permitting development at a minimum site area of 300m ² .

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						This has resulted in financial hardship and limited ability to realise value when selling due to high maintenance costs and low returns. Enabling new medium density housing within 300m ² site standards would allow people like me to live more comfortably in newer, well-designed homes while retaining older properties for rental purposes. This would improve housing affordability, support more efficient use of land close to the CBD, and provide better housing outcomes for residents.	
Adrian Sheat RML	10.01	Subdivision	Rules	SUB-R6(7)	Oppose	SUB-R6(7) – Allotments Less Than 500m ² within Airport Control Boundaries. The proposed retention of SUB-R6(7), which restricts allotments of less than 500m ² within the Outer Control Boundary or the Single Event Sound Exposure Boundary, serves no practical planning purpose. The minimum lot size appears to be driven by airport-related considerations, yet it does not address noise effects or land-use compatibility. As such, the rule is unnecessary and should be removed.	Remove Rule SUB-R6(7).
Adrian Sheat RML	10.02	Appendices	Appendix 11	Appendix 11-3	Oppose	Appendix 11-3 – Private Ways and Rights of Way. The proposed new table in Appendix 11-3 introduces a minimum legal width of 6.0m for private ways and rights of way in Rural and Rural Lifestyle areas. This directly contradicts the Code of Practice, which specifies a minimum legal width of 3.5m in Table 5.4 of the Policy. This inconsistency creates uncertainty and should be resolved to ensure alignment between the District Plan and the Policy.	Resolve the inconsistency in Appendix 11-3 for the minimum legal width for private ways and right of ways in rural and lifestyle areas.
Adrian Sheat RML	10.03	Residential 1 and 1A Zones	Rules - General	RES1Z-R5 and RES1AZ-R2	Oppose	Changing development between 350m ² and 400m ² from a discretionary to a restricted discretionary activity serves no meaningful planning outcome. In the Residential 1 Zone, the minimum lot size should be set at 350m ² , as the additional control does not materially improve amenity, infrastructure outcomes, or environmental effects. Given the existing bulk and location controls—such as site coverage limits, permeable surface requirements, yard setbacks, recession planes, and outdoor living space standards—minimum lot sizes are unnecessary. These controls already regulate development intensity and amenity outcomes effectively. Lot size should be market-driven rather than arbitrarily constrained. Refer to submission for example. Minimum lot sizes should be removed entirely from the Residential 1 and Residential 1A zones. Development intensity and amenity are already adequately controlled through bulk and location standards, making minimum lot size controls redundant.	Remove minimum lot sizes entirely from the Residential 1 and Residential 1A zones.
Environment Southland	11.01	Whole plan change			Support	Largely supports PC2 which will allow for urban intensification and redevelopment within close proximity of the CBD. Encouraging urban intensification and compact urban form will support improved social and health outcomes as more residential dwellings will be in close proximity to public parks, services, and city centres. This will also reduce travel distances for those working within the CBD and would encourage efficient public and active transport plans.	Supports the plan change.
Environment Southland	11.02	Residential 1 and 1A Zones - General			Support in part	Supports the intent to provide for addition urban development and high-quality urban design through PC2. Supports enabling greater density and diversity of housing; and good quality urban design outcomes as it aligns with the objectives, policies and Invercargill City Council’s responsibilities in the Urban Chapter of the SRPS. Specifically, Objectives URB.1, along with Policies URB.2, 3, 4, and 6. Refer to submission in full.	Promote high quality urban design. Remove inconsistencies in the wording of “good” urban design applying to RES 1 and 1A zones.

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						Issue URB.3 of the SRPS states that “Urban areas in Southland which develop in ways that do not recognise the principles of high-quality urban design are likely to be less cohesive, can experience reduced amenity and cultural values and can fail to provide for a range of transportation modes.” Terminology used in the PC2 replaces “high-quality” with “good” urban design for RES 1 and 1A Zones. Furthermore, Policy URB.4 of the SRPS encourages “high quality design”.	
Environment Southland	11.03	General			Support in part	Supports the actions, rules and policies of the PC2 to enhance efficient energy usage, by designating access to acceptable levels of daylight and sunlight in outdoor spaces and habitable spaces. Energy efficiency improvements can reduce household energy costs and reduce greenhouse gas emissions. Co-benefits of efficient natural energy use include improved health in insulated homes, and increased comfort.	Encourage appropriate site and building orientation that supports energy efficiency and solar energy gain.
Environment Southland	11.04	Code of Practice			Support	Supports the reference to the Code of Practice for Subdivision, Land Use, and Development to replace reference to the expired ICC 2016/1 Bylaw.	Retain as notified.
Environment Southland	11.05	General			Support	Enabling growth and redevelopment in areas with existing infrastructure capacity provides enhanced opportunities for diverse housing typology and effective utilisation of the piped network. Additionally, urban intensification could offset some of the housing growth into greenfield areas and rural environments, and subsequent extensions to infrastructure. Policy URB.3 in the SRPS supports the ‘intensification within preexisting areas’ and directly applies to PC2. The submitter supports urban development that encourages active transport modes such as walking and cycling, reducing the need for vehicular travel and its associated adverse effects. This aligns with Policy TRAN.4 in the SRPS which supports the management of transport activities to avoid, remedy or mitigate adverse effects on public health and the environment. Considering parking needs alongside an emphasis on active and public transport is important for accommodating greater urban intensification, as it aligns with Objective URB.1 of the SRPS. This objective seeks to establish high-quality urban environments that enhance the quality of life of residents and promotes live-work-play opportunities. Providing reliable access to the CBD and surrounding areas for those who need to reach the city’s hub for leisure, medical, and support systems is important. Air quality and long-term capacity of roading infrastructure in intensified areas needs to be considered in planning.	That ICC enable housing growth to utilise the latent capacity within existing reticulated infrastructure. Support active transport modes with accessible links between housing and services.
Environment Southland	11.06	Zones			Oppose	Conscious that there are areas proposed for housing intensification within PC2 (particularly between Tay and Tweed Streets) that are within the potentially floodable area of the Otepunī Creek. Environment Southland opposes any intensification in potentially floodable areas as it is contrary to Policies NH.3, NH.4, NH.5 and NH.6 of the SRPS which requires a precautionary approach, avoiding significant risk and mitigating natural hazard effects. Intensification of residential dwellings should not occur within an identified natural hazard location as it is contrary to the SRPS.	Oppose the proposed changes to properties between Tay and Tweed Streets from PC2 due to these properties being within a potentially floodable area from the Otepunī Creek. Changes are requested to remove areas between Tay and Tweed Street from PC2 as they are identified as potentially floodable by the Otepunī Creek.
Environment Southland	11.07	General			Support	Supports measures to mitigate natural hazards. PC2 recognises that increased urban density may contribute to environmental effects relating to stormwater runoff, which can impact the capacity of infrastructure networks if exceeded. Supports the objectives and relevant rules of the PC2 to have on all sites in residential zones permeable surface to be at a minimum 30 percent of the surfaces. The provisions ensure that effects relating to stormwater runoff can be adequately considered where permeable surfaces requirements are	- Clearly communicate the indicative nature of natural hazard information and the circumstances in which site-specific assessment may be required. - Retain provisions in PC2 to reduce the impacts of natural hazards in our changing climate, particularly requiring permeable surfaces and mitigating

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						breached. The submitter supports this precautionary approach to manage the effects of climate change in residential development. By 2040, Southland annual rainfall is projected to increase by 0-5 percent, and by 2090 most of the region is projected to experience a 5-10 percent increase in rainfall. Some guidance on future climate change expectation for Southland is available here .	
Southland District Council	12.01	Whole plan change			Support	Generally support the content of PC2 and its intent to enable greater density and diversity of housing choice in Invercargill, to promote the adoption of well-designed housing, and to incorporate reference to the Code of Practice for Subdivision, Land Use and Development. Enabling increased residential densities in zones Residential 1 and Residential 1A in conjunction with objectives and policies for good housing design is an important tool for addressing housing needs in Invercargill and Southland.	Retain as notified.
Southland District Council	12.02	Infrastructure	Overview		Support	Support the inclusion of reference to the Code of Practice for Subdivision, Land Use and Development as the guiding document to aid developers in understanding the required level of service for these matters. This Code was developed jointly by Southland District Council and Invercargill City Council and there is benefit in harmonising the standards required for works and infrastructure required for new development in these neighbouring councils.	Retain the INF Infrastructure Overview as notified.
Mike O'Regan	13.01	Whole plan change			Support in part	Property owner who generally supports the intent of the plan change, conditional on the introduction of stronger and more enforceable design standards that prioritise quality, longevity, and good urban form. Higher density housing will have long-term impacts on neighbourhoods. Buildings constructed today are likely to remain for many decades, and it is important that they are designed to age well and contribute positively to the streetscape over time. Without clear and robust design requirements, there is a risk that development will default to minimum standards, resulting in box-like, visually poor buildings that may meet technical rules but do not provide lasting quality. The submitter is concerned that relying on non-statutory design guidance alone may not be sufficient to achieve consistently good outcomes. Strong design standards will help future-proof housing stock, protect existing property owners, and ensure that increased density enhances rather than degrades residential areas.	Ensure that key design principles are embedded into enforceable standards, including but not limited to: • Building articulation and variation to avoid flat, boxy façades • Reasonable setbacks, site coverage limits, and building height transitions to protect neighbourhood character • Durable, high-quality exterior materials suitable for Invercargill's climate • Design that considers streetscape appearance, not just internal layout • Adequate outdoor space and practical parking solutions
National Public Health Service Te Waipounamu	14.01	Code of Practice			Support	Support all relevant parts that remove reference to the Invercargill City Council Bylaw 2016/1 Code of Practice for Land Development and Subdivision Infrastructure and replace it with the Code of Practice for Subdivision, Land Use, and Development. This allows greater flexibility to promote best practice design that improves outcomes for communities that can change over time without initiating a Plan Change.	Retain as notified.
National Public Health Service Te Waipounamu	14.02	Residential Zones	Overview		Support	Support the plan's intention to enable Invercargill residents to enjoy a high standard of residential amenity, for well-functioning urban environments that in turn promote the future health and wellbeing of Invercargill people. Notes that all proposed Medium Density Zones are transected by Invercargill City Councils Urban bus service.	Retain as notified.
National Public Health Service Te Waipounamu	14.03	Residential 1 Zone	Objectives and Policies	RES1Z-P5	Support in part	Support the explanation that notes a need to meet the needs of an ageing population. Given that as people age, they are more likely to become disabled, the submitter recommends this clause incorporates reference to Universal Design as an Internationally Recognised solution that makes buildings	After <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>

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						accessible to all people of all abilities at any stage of life. It includes people who use wheelchairs or other mobility aids, people with impaired vision and people who are elderly or very young. Disabled people experience poorer health outcomes than non-disabled people, and they acutely feel these inequities. These outcomes are influenced by unfair barriers to full participation in society. While the detail in Section 3.5 of the Design Guide is supported, the submitter believes the issue to be of sufficient importance to be included in the text of the Plan itself, especially considering Invercargill's ageing population.	Add Given Invercargill's ageing population, the concept of Universal Design needs to be actively promoted.
National Public Health Service Te Waipounamu	14.04	Residential Zones	Objectives	RES-O2	Support in part	While the submitter supports the text that notes the population is slowly growing and ageing, this statement needs to reflect reference to Universal Design for the same reasons as the submitters previous submission point.	Amend as follows: A range of housing types and accessible built forms that include Universal Design principles .
National Public Health Service Te Waipounamu	14.05	Residential 1A Zone	Rules	RES1AZ-R15	Support	Particularly supports this proposed provision as it relates to considerations for passive solar gain for dwellings as that is conducive to warm homes that in turn reduces the risk of hospital admissions attributable to housing. Cold homes exacerbate chronic conditions and are linked to increased respiratory and cardiovascular illnesses, mental health conditions, higher rates of infectious diseases, hospital admissions, and excess winter deaths, especially in older adults and disabled people.	Retain as notified.
National Public Health Service Te Waipounamu	14.06	Residential 1A Zone	Rules	RES1AZ-R19	Support	These proposed provisions relate to considerations for passive solar gain for dwellings as that is conducive to warm homes that in turn reduces the risk of hospital admissions attributable to housing.	Retain as notified.
Fire and Emergency New Zealand	15.01	General			Not specified	The risk of fire represents a potential adverse effect of low probability but high potential impact. Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency has an interest in the land use provisions of the IDP to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements. The provision for adequate water supply for firefighting activities is critical for the reasons set out in the submission. It is important that any new subdivision or land use has access to adequate water supply (whether reticulated or non-reticulated). This firefighting water supply will provide for the health, safety and wellbeing of people and the wider community, and therefore contributes to achieving the purpose of the RMA. PC2 enables more intensive development, including up to three-storey buildings and smaller lot sizes, which may increase demand on water supply infrastructure and create challenges for emergency services access. While the COP provides for firefighting water supply to be designed in accordance with SNZ PAS 4509:2008, PC2 does not clearly require compliance with the COP for all new land use developments in the Residential 1 and Residential 1A zones, particularly where development does not involve subdivision. The submitter also notes that water supply modelling to confirm network capacity is not yet complete, and that intensification may occur in advance of necessary infrastructure upgrades.	- Amend the Residential 1 and Residential 1A Zone objectives, policies, and rules to require that all new land use developments and subdivisions connecting to the reticulated network comply with the COP, including firefighting water supply standards in accordance with SNZ PAS 4509:2008. - Add provisions to ensure that residential intensification does not occur where water supply infrastructure capacity and pressure is insufficient, and to require necessary upgrades to be completed prior to development where required, having regard to water supply modelling outcomes. - Amend access and transport standards (including rights-of-way width, length, gradient and turning requirements) to ensure all permitted residential development is accessible for emergency services. - Introduce matters of discretion requiring consideration of emergency services access for developments with both vehicle and pedestrian-only access. - Clarify the application of access standards to land use developments that do not involve subdivision, including rights-of-way serving newly created lots. - Any other consequential amendments necessary to give effect to the above changes.

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						The submitter also requires adequate access for new developments and subdivisions to ensure that Fire and Emergency can respond to emergencies. Existing access and transport standards may not adequately provide for emergency services access to medium-density developments, particularly where pedestrian-only access or limited right-of-way access is proposed.	
Kāinga Ora - Homes and Communities	16.01	Introduction and Interpretation	Definitions	Code of Practice for Land Development and Subdivision Infrastructure	Support	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.	Delete definition as notified.
Kāinga Ora - Homes and Communities	16.02	Introduction and Interpretation	Definitions	Medium Density Housing	Oppose	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
Kāinga Ora - Homes and Communities	16.03	Subdivision	Rules	Overview	Support	Supports the amendments to refer to the most up-to-date Code of Practice.	Retain as notified.
Kāinga Ora - Homes and Communities	16.04	Subdivision	Rules	SUB-R3	Oppose in part	Seeks to add the word 'vacant' to clarify that the minimum lot sizes and dimensions only apply to vacant lot subdivision. Does not consider that a minimum allotment size should apply to any allotment created around residential units for which resource consent has been granted, and seeks amendments to SUB-R3 to reflect this. 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.	Amend as follows: SUB-R3 <u>The following subdivision activities are restricted discretionary activities:</u> 1. <u>Within the Residential 1 Zone:</u> <u>~~Vacant a~~ Allotments 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> 2. <u>Within the Residential 1A Zone:</u> a. <u>~~Vacant a~~ Allotments of equal to or greater than 300m² where:</u> i. <u>Every allotment must be capable of containing an area with minimum 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; or</u> <u>ii. The subdivision does not create any vacant</u>

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							~~allotments.~~ Advice Note: Any application arising from SUB-R3 is precluded from public and limited notification. ~~but may be limited notified.~~
Kāinga Ora - Homes and Communities	16.05	Residential Zones	Overview		Support	Supports the notified amendments, such as the inclusion of “well-functioning urban environments” in line with NPS-UD.	Retain as notified.
Kāinga Ora - Homes and Communities	16.06	Residential Zones	Objectives	RES-O1	Support	Supports the notified amendments, in particular the inclusion of “medium density is enabled” to support housing choice and affordability.	Retain as notified.
Kāinga Ora - Homes and Communities	16.07	Residential Zones	Objectives	RES-O2	Support	Supports the notified amendments, enabling diversity in housing types and “built forms”.	Retain as notified.
Kāinga Ora - Homes and Communities	16.08	Residential Zones	Objectives	RES-O3	Support	Supports the removal of “high standard” for residential amenity, which recognises that providing this may impose additional costs on landowners and developers and thereby reduce housing affordability. 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.	Retain as notified.
Kāinga Ora - Homes and Communities	16.09	Residential Zones	Policies	RES-P2	Support	Supports providing for a range of housing densities and built forms to provide for housing choice and affordability.	Retain as notified.
Kāinga Ora - Homes and Communities	16.10	Residential Zones	Policies	RES-P4	Support	Supports the notified policy in line with RES-O3.	Retain as notified.
Kāinga Ora - Homes and Communities	16.11	Residential 1 Zone	Objectives	RES1Z-O5	Support	Supports the amendment from “high quality urban design” to “good quality urban design” to allow for more efficient and effective outcomes and encourage housing affordability.	Retain as notified.
Kāinga Ora - Homes and Communities	16.12	Residential 1 Zone	Policies	RES1Z-P1	Oppose in part	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. 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. Seeks to incorporate RES1Z-P5 into this policy.	Amend as follows: 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> Explanation:...

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							5. ~~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.
Kāinga Ora - Homes and Communities	16.13	Residential 1 Zone	Policies	RES1Z-P3	Support in part	The policy is too prescriptive and reads more as assessment criteria, noting that it is repeated under notified rule RES1AZ-R7. Amendments to the policy to provide clearer direction as to how the relevant objective can be met. Supports the urban design guidance sitting outside the district plan.	Amend as follows: RES1Z-P3 Urban Design: To ~~provide for~~ ~~encourage~~ a range of residential buildings and structures including additions and alterations that ~~good urban design in terms of:~~ <u>Provide healthy, sustainable and accessible living environments;</u> <u>Are compatible with the built environment anticipated in the Residential Zone;</u> <u>Contribute positively to a changing urban environment;</u> <u>Achieve safe and attractive streets.</u> ~~1. Context~~ ~~2. Character~~ ~~3. Choice~~ ~~4. Connections~~ ~~5. Creativity~~ ~~6. Custodianship~~ ~~7. Collaboration.~~ ~~1. Neighbourhood context~~ ~~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~~
Kāinga Ora - Homes and Communities	16.14	Residential 1 Zone	Policies	RES1Z-P5	Oppose in part	Opposes the stepped approach of density restrictions through minimum section sizes. The submitter has integrated this policy into RES1Z-P1, and therefore seeks this policy to be deleted.	Delete RES1Z-P5 in its entirety.
Kāinga Ora - Homes and Communities	16.15	Residential 1 Zone	Policies	RES1Z-P7	Oppose in part	Seeks that the site coverage is increased to 50% for Residential 1A zone as per the relief sought in RES1AZ-R16.	Amend as follows: RES1Z-P7 Space Around Buildings: To maintain the residential scale and amenity of space around and between buildings.

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							Explanation: 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 Residential 1A Zone) of the site is covered in buildings. Excessive building coverage has other undesirable effects, such as overloading the City's stormwater reticulation system.
Kāinga Ora - Homes and Communities	16.16	Residential 1 Zone	Rules	RES1Z-R5 to RES1Z-R8	Oppose in part	Opposes the minimum density proposed and considers that the tiered density approach is overcomplicated. 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. 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.	Amend as follows: ~~Residential Density~~ Number of Units Per Site RES1Z-R5 The maximum ~~residential density is:~~ number of residential units permitted per site is 2. ~~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 restricted 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 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:...
Kāinga Ora - Homes and Communities	16.17	Residential 1A Zone	Rules	Overview	Oppose in part	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.	Amend as follows: The Residential 1A Zone provides residential activities with moderate concentration and bulk of buildings, such as detached, semi-detached and terraced housing, low-rise apartments, and other compatible activities. 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

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							~~urban design, and especially for larger scale developments, planning the development comprehensively...~~
Kāinga Ora - Homes and Communities	16.18	Residential 1A Zone	Issues	RES1AZ-I2	Support in part	Notes that the word ‘comprehensively’ has been proposed by Council to be deleted from other provisions. Seeks the same in this provision for consistency.	Amend as follows: RES1AZ-I2 Medium density housing (<u>especially larger scale proposals of 4 or more units</u>) can lead to decrease in amenity unless ~~it is they are well-~~ planned, ~~and well-~~ designed, ~~and larger scale proposals of 4 or more residences are developed comprehensively.~~
Kāinga Ora - Homes and Communities	16.19	Residential 1A Zone	Objectives	RES1AZ-O3	Support	Supports this policy as notified to increase housing stock through medium density redevelopment.	Retain as notified.
Kāinga Ora - Homes and Communities	16.20	Residential 1A Zone	Objectives	RES1AZ-O4	Support in part	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. Otherwise supports the notified objective.	Amend as follows: RES1AZ-O4 The Residential 1A (Medium dDensity Housing) Zone developments are is a well designed, higher density residential living environment which: 1. Contains a range of housing typologies and built forms including detached, semi-detached, terraced housing, and low-rise apartments; and 2. Provides good amenity to residents and minimising the adverse effects on offering a high level of amenity to the residents in the new units and maximising beneficial effects, and minimising adverse effects, on the surrounding neighbourhood.
Kāinga Ora - Homes and Communities	16.21	Residential 1A Zone	Policies	RES1AZ-P1	Support in part	Notes that the word ‘comprehensively’ has been proposed by Council to be deleted from other provisions. Seeks the same in this provision for consistency. 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 airport-related noise”, that other chapters within the district plan address this.	<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 ~~or in~~ 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.~~
Kāinga Ora - Homes and Communities	16.22	Residential 1A Zone	Policies	RES1AZ-P2	Oppose	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.”	Delete RES1AZ-P2 in its entirety.

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Kāinga Ora - Homes and Communities	16.23	Residential 1A Zone	Rules	RES1AZ-R1 to RES1AZ-R4	Oppose	Seeks to remove the minimum density requirements. The notified density rule is considered to be overly complicated and does not provide for the intended outcomes that PC2 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. The performance standards are adequate to provide for good quality urban form.	Delete RES1AZ-R1 to RES1AZ-R4 in their entirety.
Kāinga Ora - Homes and Communities	16.24	Residential 1A Zone	Rules	RES1AZ-R5	Support in part	Supports using the number of units as a method of managing the effects of medium density development. Considers that the words ‘units’ and ‘residential units’ are easier for plan-users to understand and more commonly used in district plans than ‘residences’. Opposes universal design and acoustic privacy as these matters are best addressed under the Building Act.	Amend as follows: Number of ~~Residences~~ Units Per Site RES1AZ-R5 The maximum number of permitted <u>residential units</u> ~~ees~~ per site is 3. RES1AZ-R6 4 or more <u>residential units</u> ~~ees~~ per site is a restricted discretionary activity. Advice Note: Any application arising from this rule is precluded from public and limited notification ~~but may be limited notified.~~ RES1AZ-R~~3~~7 For applications under RES1AZ-R~~1~~3 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:~~ 1. <u>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~~ ~~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>

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							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.~~The <u>provision of infrastructure quantum of impermeable surface and measures undertaken to address stormwater issues</u> 3. <u>Vehicle access and traffic impacts</u>
Kāinga Ora - Homes and Communities	16.25	Residential 1A Zone	Rules	RES1AZ-R8 to 11	Oppose in part	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. 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. 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.	Amend as follows: RES1AZ-R10 Where an activity does not comply with RES1AZ-R8 and/or RES1AZ-R9 above, the activity is a <u>restricted discretionary activity</u>. RES1AZ-R11 Applications under RES1AZ-R10 above shall address the following matters, <u>which will be among those taken into account by the Council over which Council will restrict its discretion</u>: 1. <u>The extent to which practicable outdoor living is achieved</u> 2. <u>Access to acceptable levels of daylight and sunlight</u> 3. <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 where this is proposed.</u> 4. <u>The extent to which the development achieves good urban design outcomes</u>
Kāinga Ora - Homes and Communities	16.26	Residential 1A Zone	Rules	RES1AZ-R12 to 15	Oppose in part	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. 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. 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.	Amend as follows: <u>Space Around Buildings</u> RES1AZ-R12 1. <u>A yard at least 2 metres deep shall be provided along the front (road) boundary of the site</u> 2. <u>A yard of at least ~~1.5~~ 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 A yard at least 4 metres deep shall be provided along all side and rear boundaries of any site containing a non-residential activity. RES1AZ-R14 Where an activity does not comply with

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							~~RES1AZ-R12 or RES1AZ-R13, the activity is a restricted discretionary activity.~~ ~~RES1AZ-R15 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:...~~
Kāinga Ora - Homes and Communities	16.27	Residential 1A Zone	Rules	RES1AZ-R16 to 19	Oppose in part	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. 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. 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.	Amend as follows: <u>Site Coverage</u> ~~RES1AZ-R16 Maximum coverage of all buildings on the site shall not exceed 45% of net site area.~~ ~~RES1AZ-R17 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.~~ ~~RES1AZ-R187 Where the coverage of all buildings on the site exceeds 50% then it is a restricted discretionary non-complying activity.~~ ~~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:...~~
Kāinga Ora - Homes and Communities	16.28	Residential 1A Zone	Rules	RES1AZ-R20 to 21	Support	Supports this rule in providing for design variation, while managing the height of buildings and potential effects on adjacent properties.	Retain as notified.
Kāinga Ora - Homes and Communities	16.29	Residential 1A Zone	Rules	RES1AZ-R22 to 24	Oppose in part	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. 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. 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.	Amend as follows: <u>Permeable Surfaces</u> ~~RES1AZ-R22 The minimum area of permeable surface is 32% of the gross site area.~~ ~~RES1AZ-R23 Where the area of permeable surface is to be less than 32% of the gross site area, then the activity is a restricted discretionary activity.~~
Kāinga Ora - Homes and Communities	16.30	Residential 1A Zone	Rules	RES1AZ-R25 to 29	Oppose in part	Supports the outlook standards but opposes the inclusion of the glazing standards. Considers that the rule may result in designs that are functionally inappropriate and which do not achieve the intended outcomes of the rule.	Amend the heading as follows: <u>Outlook and Glazing...</u> Delete Rules RES1AZ-R28 and 29 in their entirety.
IPI Properties LTD et al	17.01	Whole plan change			Support	Strongly support, it is considered particularly relevant and important that the following advantages would apply: 1. The availability of much needed additional housing in the close proximity to the city centre as opposed to outlying new greenfield sites.	Retain as notified.

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						- The resulting benefit of the Plan Change, in that it would allow more much needed affordable accommodation, particularly when considered in conjunction with the new Government 'granny flat' proposal. - Space efficient development in utilising existing Council infrastructure services which has major cost benefit to ratepayers as opposed to having to create expensive new infrastructure that applies with urban sprawl new Greenfields site development. - The better utilisation of large sections within the Residential 1 and 1A zones that are currently, in many instances, creating adverse environmental effects. - In highlighting the adverse environmental concerns reference can be made to the number of large 1,000 sq.m. sections or similar, particularly when they are subject to rental accommodation. - In many cases tenants of these properties, despite their obligations under any tenancy arrangements, are not interested and refuse to take any pride or care in maintaining their substantial surplus area of the section. There is ample evidence to show the ongoing problems caused through untidy larger section areas which in turn results in a bad visual impact on the city and additional cost to ratepayers in Council compliance issues. The better utilisation of such land would make logical sense and would meet good planning procedures.	
IPI Properties LTD et al	17.02	General			Support	It is pleasing to note that the Council is being pro-active in facilitating this legislation and resulting benefits applying with streamlining procedures and compliance costs etc. There are similarities between PC2 and the new Granny Flat Legislation that will be in the best interests of ratepayers and the city itself. These benefits would include:- - Better utilisation of inner city land and existing infrastructure services. - To combat the high level of new building costs, smaller homes up to 70 sq.m., as now provided for, can provide a much more favourable entry point in terms of total cost. - The 'affordability factor' would have major benefits to the increasing housing requirements of the retiring aging population as well as providing an opportunity for first home buyers and others to be able to get a "step on the property ladder" with their own house, as opposed to never otherwise having the opportunity to do so. - It is well recognised that there is a housing shortage in New Zealand and the Council's proposed new legislation would be advantageous in assisting to meet growing demand, particularly in cases where cost of housing and debt servicing is a major issue and can be very concerning for the increasing percentage of the retired population together with first home buyers etc.	No specific relief sought.
IPI Properties LTD et al	17.03	Residential 1 and 1A Zones	Rules - General		Support in part	The submitter owns a substantial number of properties within the Residential 1 and 1A zone predominantly based in the south Invercargill area and details that there is considerable potential if the Council can create the right environment to develop these sections with affordable housing. Because of the cost of building new housing in Invercargill is the same if not higher than elsewhere but with the resulting property values in Invercargill, along with rental values being substantially below other major cities in New Zealand, it is important to try and	Review the 450m ² density requirement. Allow additional units to be built, provided the 40% building coverage standard is achieved.

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						create an incentive and make the financial feasibility of new housing development more attractive. The new Granny Flat Legislation and PC2 will help to facilitate this matter. It does seem, however, that there is one major anomaly that is necessary to achieve the full benefit and resulting advantages that could be created for the benefit of the city. There needs to be an appropriate acceptance of the density and number of units that can be established on a particular site for the reasons set out in the submission. It is strongly suggested that to achieve the full benefit of PC2 that it would make sense and, should be permissible, to have the 450 sq.m., land requirement per house reviewed to allow additional units to be built provided the same 40% building coverage is achieved as maximum density, with an example set out in the submission. It would make logical sense to ensure that reasonable density provisions are observed by maintaining the 40% coverage but allowing for an increased number of units to be built on the basis that the open space coverage is within 40% that is currently permissible for a single dwelling. It is strongly urged that this important aspect should be incorporated under PC2 for the reasons set out in the submission. It would, be attractive to developers, who would then have the incentive in terms of financial viability to look at developing sections for more housing, particularly in the inner city area which must make logical sense when under the existing District Plan there is no incentive to do this.	
Ministry of Education	18.01	Residential 1 Zone	Rules	RES1Z-R2	Neutral	Neutral with regards to intensification in principle, however, seek a more permissive activity status for educational facilities within the RES1Z and RES1AZ zones. The current discretionary activity status does not provide for educational facilities. Requests that educational facilities are enabled in the RES1Z and RES1AZ zones to better serve the education needs of the residential community without added cost and uncertainty that comes with a discretionary activity status. Provision of a separate rule for educational facilities, or amendment to the existing rule, as a restricted discretionary activity would provide Council and the community sufficient and appropriate assurance that the potential and actual effects of a new educational facility would be considered through a resource consent process. While the Ministry can (and is likely to) utilise the Notice of Requirement process provided for under s168 of the RMA for the development of new educational facilities, this does not negate the need for educational facilities to be specifically provided for within residential zones. The inclusion of enabling provisions for educational facilities within the residential zone chapters would thereby assist both the territorial authority and the Ministry in enabling future educational facilities within the Invercargill district.	Amend RES1Z-R2 as outlined below: RES1Z-R2 Discretionary Activities: The following are discretionary activities in the Residential 1 Zone: ~~5. Educational Activity other than those on sites listed in APP10 – Appendix 10 Educational Activity (Existing)~~ <u>RES1Z-RXX</u> <u>Restricted Discretionary Activities:</u> <u>The following is a restricted discretionary activity in the Residential 1 Zone:</u> <u>1. Educational Activity other than those on sites listed in APP10 – Appendix 10 Educational Activity (Existing)</u> <u>Matters of discretion are restricted to:</u> <u>1. the location of landscaping; and</u> <u>2. any adverse effects on the streetscape; and</u> <u>3. any adverse effects on the amenity values for neighbouring sites; and</u> <u>4. the operation of the activity, including the effects of noise, lighting and from the generation of traffic.</u>
Gareth Clarke*	19.01	Whole Plan Change			Support in part	Submitter's position on PC2 is one of general support. If this is what the community through their Council consider is needed, then I fully support the intention of the proposal. However, before making decisions on these changes the submitter believes there is a need to carefully consider drivers and costs.	Before making decisions on PC2, carefully consider the following:

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						In order to assist with these considerations, submitter wishes to add some additional context that appears to be either missing or misrepresented in the analysis provided by the Council thus far. Disagrees that there is a disconnect between the outcomes sought in the objectives and policies for the RES1A Zone and the rules, and considers that the objectives and policies for the RES1A Zone appear to be working much as intended. The analysis in the Section 32 Report and supporting documentation fails to adequately acknowledge the original purpose of the RES1A Zone, which the submitter understands was to use the zoning primarily as a mechanism to drive reinvestment, rejuvenation and renewal in some of the oldest parts of the city and to provide an increase in residential density within walkable distance of the CBD to provide valuable critical mass on the outskirts of the CBD in locations where residents would be able to easily access services therein. The Zone was developed as a response to a quality of the environment issue rather than housing need one, and the zoning provisions were focused on quality rather than quantity. Enabling an increase in residential density to provide additional housing capacity for a growing population was not a driver of the zone. Population growth was, and still is, relatively slow, and it was considered there was sufficient capacity within the wider residential zoned areas of Invercargill to meet that growth, as indeed the analysis shows is still the case. The submitter notes that now the issue seems to have changed and it's no longer the need for reinvestment in these areas that is the issue, but the need for a supply of medium density housing, and to achieve that, the District Plan zoning provisions of course need to change. However, the submitter considers that the changes as proposed, give too much priority to quantity over quality, leaving the character and amenity of existing residential areas and the residence therein as an afterthought, and risking creating substandard forms of development and dysfunctional urban environments. Given this inherent risk, the Council therefore needs to be clear in their own minds that there is actually a need that justifies the risk such changes bring. The question therefore becomes whether or not there is enough information to make such decisions. Submitter considers that existing planning provisions and restrictive consenting pathways affecting commercial feasibility have been overexaggerated in the s32 Report, and are working as intended to enable high-quality medium density housing development. Housing enabled in the Business 1 Zone has not been considered in housing capacity assessments, and may have the effect of overstating the issue of a shortfall of capacity in the central area. The Council could be looking at what other levers it can pull to encourage demand and incentivise development in the Business 1 Zone rather than enabling erosion of the character and amenity of existing residential areas unnecessarily.	a) What the driver of these changes actually is (including the applicability of any national direction), and if this is the best way of meeting that need; and b) What the true cost of these changes might be on the existing neighbourhoods to which they apply. c) how the existing character and amenity of RES1A Zone areas can be protected, and whether there are better alternatives to achieving the urban intensification required without unduly affecting existing residential areas.

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						Submitter questions why PC2 was progressed, and is it an efficient and effective use of Council resources, when essentially all other plan development work across the country was halted, and with resource management reform on the cards this year, and the associated changes which come under the new regime.	
Gareth Clarke*	19.02	Introduction and Interpretation	Definitions	Code of Practice, Subdivision, Land Use and Development	Support in part	While the removal of the reference to the previous Code of Practice bylaw is supported, if the Code of Practice is mentioned in the Plan, then it should be included in the definitions in some form. Otherwise, it is not clear to casual plan users what the document actually is, or at least what version should be referred to. The proposed changes do not appear to give an indication anywhere what version of the document is to be used when managing the effects of development on Council infrastructure i.e. is it only the latest/current version that is to be used, or is it the version that was in place when the Plan was written? That is to say, is there recourse for someone to consider only a previous version that may be more advantageous to their needs and/or more detrimental to the needs of the Council?	Include a definition for ‘Code of Practice for Subdivision, Land Use, and Development’ that clarifies what version/s are relevant.
Gareth Clarke*	19.03	Subdivision	Methods	SUB-M5	Support in part	Building on the submission point on the definition of the ‘Code of Practice, Subdivision, Land Use and Development’, what do the words ‘any’ and ‘relevant’ actually mean i.e. could it be interpreted that the 2016 Code of Practice Bylaw was relevant at the time the rules of the District Plan were written, so it is of relevant consideration?	Amend the provision to clarify how the relevant Code of Practice is to be determined.
Gareth Clarke*	19.04	Residential Zones	Overview		Support in part	Considers that it is important to continue to provide a high level of residential amenity in Invercargill, even at higher residential densities. However, replacing the reference to “retaining the main qualities of this amenity” with “continuing to provide amenity” is indicative of an intention to enable some degree of erosion of existing residential amenity in the RES1A Zone so as to provide for increased residential density, opening the door for substandard urban design. Additionally, considers that a high standard of residential amenity is important for more than just “well-functioning urban environments”. It also creates inclusive and desirable places for a diverse population to live. A high standard of amenity is important in creating places residents can take pride in and be happy to call home, not just okay places to live.	Delete the phrase “continuing to provide amenity” and retain the existing reference to “retaining the main qualities of this amenity”.
Gareth Clarke*	19.05	Residential Zones	Objectives	RES-O1	Support in part	This objective as originally written appears to be seeking to limit the spread of residential environments outside of defined residential areas. The addition of the medium density housing reference has the effect of implying that medium density housing is to be enabled in all residential parts of the district, not just the RES1A Zone. If that is the case, why refer to medium density housing in this objective at all? If that is not the case, this needs to be clarified.	Either remove the phrase “medium density housing is enabled” or clarify that it is only enabled in the RES1A Zone, whichever is the relevant path.
Gareth Clarke*	19.06	Residential Zones	Objectives	RES-O2	Oppose	It is unclear what value the addition of “and built forms” adds to the objective. The objective as originally written appears to simply be implying that it’s anticipated that there will be a range of dwelling types, e.g. standalone dwellings, townhouses, duplexes, blocks of flats etc., all built in accordance with identified building standards, e.g. height etc. The addition of “and built forms” does therefore potentially lay the groundwork for taller apartment blocks etc. to be built as well. Additionally, the removal of “only” from the last sentence weakens the point that the original objective was trying to make, that Invercargill does not have	Retain objective as currently drafted in the Invercargill City District Plan.

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						the same growth pressures as other areas. This change alters the meaning slightly from one of “there’s not a lot going on so no need to go too crazy with the planning” to “we’re getting there, so let’s get ready for growth” (which may never come).	
Gareth Clarke*	19.07	Residential Zones	Objectives	RES-O3	Oppose	This change seems to indicate that the Council will now be accepting of lower levels of residential amenity and substandard urban design. Additionally, this objective applies generally to all residential zones so it should be kept general without reference in the individual zones. Objectives that speak to the anticipated character and outcomes of individual zones should be contained in the provisions relating to that zone.	Retain objective as currently drafted in the Invercargill City District Plan.
Gareth Clarke*	19.08	Residential Zones	Policies	RES-P4	Oppose	Same reasons as for RES-O3.	Retain policy as currently drafted in the Invercargill City District Plan.
Gareth Clarke*	19.09	Residential 1 Zone	Objectives	RES1Z-O5	Oppose	The mantra of the current District Plan, particularly in the RES1A Zone, is that high quality urban design is paramount. With respect to Medium Density Housing developments in the RES1A Zone, the intention of the Plan is that nothing should be off the table in terms of density and housing typology, provided its design is very well considered. The proposed changes to the Plan now talk about achieving a well-functioning urban area. But there appears to be a mismatch between the Residential Overview objectives and the RES1Z provisions. A well-functioning urban area is one in which there is high quality urban design. If we lower our expectations to only requiring “good” urban design, we’ll end up with just okay-functioning urban areas. This outcome does, however, seem to be entirely intentional i.e. the Council is happy to sacrifice the functionality of our residential areas in order to enable more density, including in the RES1 Zone. However, the proposal has not provided sufficient evidence to show that a reduction of urban design standards is actually necessary in order to achieve the higher densities sought.	Retain objective as currently drafted in the Invercargill City District Plan.
Gareth Clarke*	19.10	Residential 1 Zone	Policies	RES1Z-P1	Oppose	The explanation as originally written appears to be saying that 400m² should be able to provide all the space a person needs to enjoy a good level of amenity in Invercargill, the implication being that by going below size you start to have to make tradeoffs with things like open space and sunlight etc. Therefore, all these things need to be considered (i.e. as a comprehensive package) when designing higher density development. The changes now proposed alter that explanation slightly by saying that people living in higher density situations have different needs in terms of sunlight and open space than those in ‘general’ residential living areas. Submitter agrees that those living in higher density living situations perhaps have a higher tolerance to reduced residential amenity, or are at least more willing to accept the tradeoffs in amenity needed to achieve a higher residential density, but they do still require these needs to be met, which could be, for example, in the form of additional artificial lighting and heating etc. that use more energy, or nearby access to public open space. These needs still exist to some degree and the fact that tenants of these developments may be more willing to accept these tradeoffs in amenity, and indeed in some cases actually prefer them, shouldn’t minimise the importance of encouraging as high an amenity as can practicably be achieved within these developments, and perhaps the best way	Retain policy as currently drafted in the Invercargill City District Plan.

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						of ensuring this is by requiring such developments to be comprehensively designed.	
Gareth Clarke*	19.11	Residential 1 Zone	Policies	RES1Z-P3	Support in part	The changes to the list of key urban design elements to be considered is supported, however, the removal of any explanation within the Plan of what each of these terms mean and why they're important is not. The provision of the external urban design guidance is also supported, however, this type of external guidance can often be hard for applicant's to come by despite the Council's best intentions (e.g. website links get broken, staff turnover means it gets lost etc.). It is much more user friendly for applicants (and dare I say, decision makers) to retain at least some explanation of these elements in the District Plan itself.	Retain some form of explanation of the individual urban design elements listed in RES1Z-P3 in the District Plan itself.
Gareth Clarke*	19.12	Residential 1 Zone	Policies	RES1Z-P5	Oppose	The proposed plan change, and this policy in particular, seems to be trying to enable more ad-hoc higher density subdivision/housing, and in doing so risks limiting any consideration of how such ad-hoc developments relate to their surroundings, how they relate to their particular environmental context. A more ad-hoc approach to higher density development across all zones risks creating poor functioning places, which seems at odds with the above objectives of well-functioning places. The qualifier of "if poorly designed" in the explanation to this policy serves to weaken the point made in District Plan as currently drafted, being that on sites below 400m2 in Invercargill, you start to loose amenity and begin having to tradeoff elements of good design and amenity against each other, including important things in the Invercargill context, like access to daylight and solar gain. Further than that, the final sentence seems to strongly suggest that Council will in fact get in behind higher density housing, including low-rise apartments, with little consideration of the impact it has on the quality of the living environment of any existing neighbours, provided the residents of the new development themselves have a high-quality living environment. That is to say, the Council is prepared to trade the living environment of existing residents for that of new residents. To minimise the risks that the encouragement of ad-hoc medium density housing has on existing residential character and amenity, the Council needs to allow itself to be more circumspect in what medium density developments it supports by encouraging medium density housing developments (i.e. not just medium density housing on its own) that are comprehensively planned and designed to a standard higher than just the listed minimum performance standards, which effectively become the target design level for a lot of developers.	Retain the policy as currently drafted in the Invercargill City District Plan.
Gareth Clarke*	19.13	Residential 1A Zone	Objectives	RES1AZ-O4	Oppose	The proposed changes to the objective appear to have the effect of turning the RES1A Zone from a residential zone where some medium density development could occur under the right circumstances, to an out and out medium density housing zone where existing residential character and amenity is up for grabs. This is a significant change in approach to land use management in these zones and the evidence supporting such a change needs to be carefully considered so as to ensure the amenity currently enjoyed by residents of these areas is not unnecessarily and wantonly eroded.	Retain the policy as currently drafted in the Invercargill City District Plan.

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Gareth Clarke*	19.14	Residential 1A Zone	Policies	RES1AZ-P2	Support in part	See reasons for RES1Z-P3, though the first sentence could be amended to include the matters referred to in RES1AZ-O4 directly so that the policy can be read and understood on its own.	Retain some form of explanation of the individual urban design elements listed in RES1Z-P3 in the District Plan itself, and either delete the addition to the first sentence or amend it so it can be easily read and understood on its own.
Gareth Clarke*	19.15	Residential 1A Zone	Rules		Support in part	Supported only to the extent that the RES1A Zone continues to be a dedicated “medium density housing zone” in the District Plan.	Retain RES1A rules as currently drafted in the District Plan.
Gareth Clarke*	19.16	Residential 1A Zone	Rules	RES1AZ-R20	Support in part	Supported only to the extent that the RES1A Zone continues to be a dedicated “medium density housing zone” in the District Plan, though it is noted that the proposed rule results in the slightly perverse situation whereby the maximum height of buildings and structures in the RES1A Zone is 1m higher than it is in the main business zone of the CBD. It is also noted that due to the proposed changes to the recession planes that apply to the RES1A Zone, residents within this zone appear to potentially have more of a right to daylight and sunlight than the residents of the RES1 Zone who neighbour the RES1A Zone (i.e. the recession plan applying to sites in the Business 1 Zone adjoining the RES1A Zone is much lower than that applying to RES1A Zone sites adjoining the RES1 Zone – noting that there are actually no RES1 Zone properties directly adjoining the RES1A Zone).	Retain RES1A rules as currently drafted in the District Plan

Summary of Submissions by Topic

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Southland Community Housing Group	01.01	Whole plan change			Support	Aware of a shortage of affordable housing for those on low incomes. Currently 177 households are on the Housing Register for Invercargill seeking a state house, this involves around 300 individuals with a chronic housing need. The highest category are single people. Invercargill's housing stock on average contains larger and older homes than the NZ average and affordable, high quality smaller homes are very hard to acquire. The proposed changes will enable many more smaller homes to be built. Aware that many more households have housing needs, but are not on the housing register. Most who are seeking housing are elderly or low income families and being close to key amenities is very important. The specific zones outlined will allow most new housing enabled by the rule changes to meet this important criteria. Currently Invercargill is one of the few cities experiencing an increase in property values as demand outstrips supply. However, property values are relatively low and, with rising construction costs, the changes will provide greater incentives for developers to build more houses. Given the circumstances of many of those seeking housing, large sections are not a priority, so smaller sections for each housing unit is not a negative issue. Brown field developments are less costly, don't require new public transport routes or amenities and don't impinge on productive rural land.	Accept all the proposed changes to the District Plan.
Sarah Robertson	02.01	Whole plan change			Oppose	Seen the way this has changed larger cities, and do not want Invercargill to become like them - it will result in a shift in the culture of the city.	Don't allow this to proceed. Pull down some of the more derelict house in Appleby, Strathern, Kew, Clifton, etc, which have the larger sections, and subdivide into 500m ² land, and build on those. To build medium density housing, especially in the city, will create a high density living which will ruin the city.
Vinay Andrades	03.01	Whole plan change			Support	Development costs to be passed on to developer, not rate payer.	Development costs to be passed on to developer, not rate payer.

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Janet	04.01	Whole plan change			Oppose	The provisions are inappropriate for Invercargill’s local context and may result in unintended adverse effects. Concerned that the proposed approach does not adequately reflect local character, infrastructure capacity, development feasibility, or community outcomes, and that the provisions may impose unnecessary costs and constraints. Opposes the specific provisions, except where amendments are made as outlined in this submission. The proposed provisions are not appropriately tailored to Invercargill’s local context, including existing neighbourhood character, infrastructure capacity, and growth patterns. The housing provisions and Code of Practice, may impose unnecessary and disproportionate development requirements that increase costs without delivering clear environmental or community benefits. There is insufficient flexibility within the provisions to allow for practical, site-specific solutions that can manage effects while still enabling appropriate development. The proposed approach risks unintended consequences for housing affordability and development viability within Invercargill. The provisions may create uncertainty by operating the Code of Practice as an additional regulatory layer rather than as enabling guidance.	Decline PC2 in its entirety. Alternatively, if the Council is not prepared to decline the plan change, the submitter seeks that the Council amend PC2 to better reflect Invercargill’s local character and infrastructure constraints, provide greater flexibility and clarity in the application of standards and the Code of Practice, and remove or revise provisions that add cost without demonstrable benefit.
Bruce Halligan	07.01	Whole plan change			Support	This will assist with provision of further housing close to the CBD and will mitigate the potential for further urban sprawl into productive land on the fringes of the city.	Proceed with the plan change.
Sarjana Duwal	09.01	Whole plan change			Support	Ther provisions enable increased housing density and diversity within the Residential 1 and 1A Zones, support well-designed medium density housing close to the CBD, and update references to the current Code of Practice to ensure consistency with contemporary development standards. PC2 enables increased housing density and a greater diversity of housing types within the Residential 1 and 1A Zones, helping to address identified unmet demand for medium density housing close to the CBD. The changes provide appropriate planning flexibility while promoting good urban design and align the District Plan with the current Code of Practice. This decision is sought because the current housing market in Invercargill makes it difficult for new homeowners to afford or access modern, well-designed homes. Many purchasers, including myself, are forced to buy older houses that require significant ongoing maintenance and costly renovations. This has resulted in financial hardship and limited ability to realise value when selling due to high maintenance costs and low returns. Enabling new medium density housing within 300m² site standards would allow people like me to live more comfortably in newer, well-designed homes while retaining older properties for rental purposes. This would improve housing affordability, support more efficient use of land close to the CBD, and provide better housing outcomes for residents.	Adopt PC2 as notified, including permitting development at a minimum site area of 300m ² .
Environment Southland	11.01	Whole plan change			Support	Largely supports PC2 which will allow for urban intensification and redevelopment within close proximity of the CBD. Encouraging urban intensification and compact urban form will support improved social and health outcomes as more residential dwellings will be in close proximity to public parks, services, and city centres. This will also reduce travel distances for those working within the CBD and would encourage efficient public and active transport plans.	Supports the plan change.

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Southland District Council	12.01	Whole plan change			Support	Generally support the content of PC2 and its intent to enable greater density and diversity of housing choice in Invercargill, to promote the adoption of well-designed housing, and to incorporate reference to the Code of Practice for Subdivision, Land Use and Development. Enabling increased residential densities in zones Residential 1 and Residential 1A in conjunction with objectives and policies for good housing design is an important tool for addressing housing needs in Invercargill and Southland.	Retain as notified.
Mike O'Regan	13.01	Whole plan change			Support in part	Property owner who generally supports the intent of the plan change, conditional on the introduction of stronger and more enforceable design standards that prioritise quality, longevity, and good urban form. Higher density housing will have long-term impacts on neighbourhoods. Buildings constructed today are likely to remain for many decades, and it is important that they are designed to age well and contribute positively to the streetscape over time. Without clear and robust design requirements, there is a risk that development will default to minimum standards, resulting in box-like, visually poor buildings that may meet technical rules but do not provide lasting quality. The submitter is concerned that relying on non-statutory design guidance alone may not be sufficient to achieve consistently good outcomes. Strong design standards will help future-proof housing stock, protect existing property owners, and ensure that increased density enhances rather than degrades residential areas.	Ensure that key design principles are embedded into enforceable standards, including but not limited to: • Building articulation and variation to avoid flat, boxy façades • Reasonable setbacks, site coverage limits, and building height transitions to protect neighbourhood character • Durable, high-quality exterior materials suitable for Invercargill's climate • Design that considers streetscape appearance, not just internal layout • Adequate outdoor space and practical parking solutions
IPI Properties LTD et al	17.01	Whole plan change			Support	Strongly support, it is considered particularly relevant and important that the following advantages would apply: 1. The availability of much needed additional housing in the close proximity to the city centre as opposed to outlying new greenfield sites. 2. The resulting benefit of the Plan Change, in that it would allow more much needed affordable accommodation, particularly when considered in conjunction with the new Government 'granny flat' proposal. 3. Space efficient development in utilising existing Council infrastructure services which has major cost benefit to ratepayers as opposed to having to create expensive new infrastructure that applies with urban sprawl new Greenfields site development. 4. The better utilisation of large sections within the Residential 1 and 1A zones that are currently, in many instances, creating adverse environmental effects. 5. In highlighting the adverse environmental concerns reference can be made to the number of large 1,000 sq.m. sections or similar, particularly when they are subject to rental accommodation. 6. In many cases tenants of these properties, despite their obligations under any tenancy arrangements, are not interested and refuse to take any pride or care in maintaining their substantial surplus area of the section. There is ample evidence to show the ongoing problems caused through untidy larger section areas which in turn results in a bad visual impact on the city and additional cost to ratepayers in Council compliance issues. The better utilisation of such land would make logical sense and would meet good planning procedures.	Retain as notified.
Gareth Clarke*	19.01	Whole Plan Change			Support in part	Submitter's position on PC2 is one of general support. If this is what the community through their Council consider is needed, then I fully support the	Before making decisions on PC2, carefully consider the following:

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						intention of the proposal. However, before making decisions on these changes the submitter believes there is a need to carefully consider drivers and costs. In order to assist with these considerations, submitter wishes to add some additional context that appears to be either missing or misrepresented in the analysis provided by the Council thus far. Disagrees that there is a disconnect between the outcomes sought in the objectives and policies for the RES1A Zone and the rules, and considers that the objectives and policies for the RES1A Zone appear to be working much as intended. The analysis in the Section 32 Report and supporting documentation fails to adequately acknowledge the original purpose of the RES1A Zone, which the submitter understands was to use the zoning primarily as a mechanism to drive reinvestment, rejuvenation and renewal in some of the oldest parts of the city and to provide an increase in residential density within walkable distance of the CBD to provide valuable critical mass on the outskirts of the CBD in locations where residents would be able to easily access services therein. The Zone was developed as a response to a quality of the environment issue rather than housing need one, and the zoning provisions were focused on quality rather than quantity. Enabling an increase in residential density to provide additional housing capacity for a growing population was not a driver of the zone. Population growth was, and still is, relatively slow, and it was considered there was sufficient capacity within the wider residential zoned areas of Invercargill to meet that growth, as indeed the analysis shows is still the case. The submitter notes that now the issue seems to have changed and it's no longer the need for reinvestment in these areas that is the issue, but the need for a supply of medium density housing, and to achieve that, the District Plan zoning provisions of course need to change. However, the submitter considers that the changes as proposed, give too much priority to quantity over quality, leaving the character and amenity of existing residential areas and the residence therein as an afterthought, and risking creating substandard forms of development and dysfunctional urban environments. Given this inherent risk, the Council therefore needs to be clear in their own minds that there is actually a need that justifies the risk such changes bring. The question therefore becomes whether or not there is enough information to make such decisions. Submitter considers that existing planning provisions and restrictive consenting pathways affecting commercial feasibility have been overexaggerated in the s32 Report, and are working as intended to enable high-quality medium density housing development. Housing enabled in the Business 1 Zone has not been considered in housing capacity assessments, and may have the effect of overstating the issue of a shortfall of capacity in the central area. The Council could be looking at what other levers it can pull to encourage demand and incentivise development in	a) What the driver of these changes actually is (including the applicability of any national direction), and if this is the best way of meeting that need; and b) What the true cost of these changes might be on the existing neighbourhoods to which they apply. c) how the existing character and amenity of RES1A Zone areas can be protected, and whether there are better alternatives to achieving the urban intensification required without unduly affecting existing residential areas.

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						the Business 1 Zone rather than enabling erosion of the character and amenity of existing residential areas unnecessarily. Submitter questions why PC2 was progressed, and is it an efficient and effective use of Council resources, when essentially all other plan development work across the country was halted, and with resource management reform on the cards this year, and the associated changes which come under the new regime.	
Environment Southland	11.03	General			Support in part	Supports the actions, rules and policies of the PC2 to enhance efficient energy usage, by designating access to acceptable levels of daylight and sunlight in outdoor spaces and habitable spaces. Energy efficiency improvements can reduce household energy costs and reduce greenhouse gas emissions. Co-benefits of efficient natural energy use include improved health in insulated homes, and increased comfort.	Encourage appropriate site and building orientation that supports energy efficiency and solar energy gain.
Environment Southland	11.05	General			Support	Enabling growth and redevelopment in areas with existing infrastructure capacity provides enhanced opportunities for diverse housing typology and effective utilisation of the piped network. Additionally, urban intensification could offset some of the housing growth into greenfield areas and rural environments, and subsequent extensions to infrastructure. Policy URB.3 in the SRPS supports the 'intensification within preexisting areas' and directly applies to PC2. The submitter supports urban development that encourages active transport modes such as walking and cycling, reducing the need for vehicular travel and its associated adverse effects. This aligns with Policy TRAN.4 in the SRPS which supports the management of transport activities to avoid, remedy or mitigate adverse effects on public health and the environment. Considering parking needs alongside an emphasis on active and public transport is important for accommodating greater urban intensification, as it aligns with Objective URB.1 of the SRPS. This objective seeks to establish high-quality urban environments that enhance the quality of life of residents and promotes live-work-play opportunities. Providing reliable access to the CBD and surrounding areas for those who need to reach the city's hub for leisure, medical, and support systems is important. Air quality and long-term capacity of roading infrastructure in intensified areas needs to be considered in planning.	That ICC enable housing growth to utilise the latent capacity within existing reticulated infrastructure. Support active transport modes with accessible links between housing and services.
IPI Properties LTD et al	17.02	General			Support	It is pleasing to note that the Council is being pro-active in facilitating this legislation and resulting benefits applying with streamlining procedures and compliance costs etc. There are similarities between PC2 and the new Granny Flat Legislation that will be in the best interests of ratepayers and the city itself. These benefits would include:- 1. Better utilisation of inner city land and existing infrastructure services. 2. To combat the high level of new building costs, smaller homes up to 70 sq.m., as now provided for, can provide a much more favourable entry point in terms of total cost. 3. The 'affordability factor' would have major benefits to the increasing housing requirements of the retiring aging population as well as providing an opportunity for first home buyers and others to be able to get a "step on the property ladder" with their own house, as opposed to never otherwise having the opportunity to do so. 4. It is well recognised that there is a housing shortage in New Zealand and the Council's proposed new legislation would be advantageous in	No specific relief sought.

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						assisting to meet growing demand, particularly in cases where cost of housing and debt servicing is a major issue and can be very concerning for the increasing percentage of the retired population together with first home buyers etc.	
Environment Southland	11.07	General			Support	Supports measures to mitigate natural hazards. PC2 recognises that increased urban density may contribute to environmental effects relating to stormwater runoff, which can impact the capacity of infrastructure networks if exceeded. Supports the objectives and relevant rules of the PC2 to have on all sites in residential zones permeable surface to be at a minimum 30 percent of the surfaces. The provisions ensure that effects relating to stormwater runoff can be adequately considered where permeable surfaces requirements are breached. The submitter supports this precautionary approach to manage the effects of climate change in residential development. By 2040, Southland annual rainfall is projected to increase by 0-5 percent, and by 2090 most of the region is projected to experience a 5-10 percent increase in rainfall. Some guidance on future climate change expectation for Southland is available here .	- Clearly communicate the indicative nature of natural hazard information and the circumstances in which site-specific assessment may be required. - Retain provisions in PC2 to reduce the impacts of natural hazards in our changing climate, particularly requiring permeable surfaces and mitigating.
Fire and Emergency New Zealand	15.01	General			Not specified	The risk of fire represents a potential adverse effect of low probability but high potential impact. Fire and Emergency has a responsibility under the Fire and Emergency New Zealand Act 2017 to provide for firefighting activities to prevent or limit damage to people, property and the environment. As such, Fire and Emergency has an interest in the land use provisions of the IDP to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements. The provision for adequate water supply for firefighting activities is critical for the reasons set out in the submission. It is important that any new subdivision or land use has access to adequate water supply (whether reticulated or non-reticulated). This firefighting water supply will provide for the health, safety and wellbeing of people and the wider community, and therefore contributes to achieving the purpose of the RMA. PC2 enables more intensive development, including up to three-storey buildings and smaller lot sizes, which may increase demand on water supply infrastructure and create challenges for emergency services access. While the COP provides for firefighting water supply to be designed in accordance with SNZ PAS 4509:2008, PC2 does not clearly require compliance with the COP for all new land use developments in the Residential 1 and Residential 1A zones, particularly where development does not involve subdivision. The submitter also notes that water supply modelling to confirm network capacity is not yet complete, and that intensification may occur in advance of necessary infrastructure upgrades. The submitter also requires adequate access for new developments and subdivisions to ensure that Fire and Emergency can respond to emergencies. Existing access and transport standards may not adequately provide for	- Amend the Residential 1 and Residential 1A Zone objectives, policies, and rules to require that all new land use developments and subdivisions connecting to the reticulated network comply with the COP, including firefighting water supply standards in accordance with SNZ PAS 4509:2008. - Add provisions to ensure that residential intensification does not occur where water supply infrastructure capacity and pressure is insufficient, and to require necessary upgrades to be completed prior to development where required, having regard to water supply modelling outcomes. - Amend access and transport standards (including rights-of-way width, length, gradient and turning requirements) to ensure all permitted residential development is accessible for emergency services. - Introduce matters of discretion requiring consideration of emergency services access for developments with both vehicle and pedestrian-only access. - Clarify the application of access standards to land use developments that do not involve subdivision, including rights-of-way serving newly created lots. - Any other consequential amendments necessary to give effect to the above changes.

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						emergency services access to medium-density developments, particularly where pedestrian-only access or limited right-of-way access is proposed.	
Kāinga Ora - Homes and Communities	16.01	Introduction and Interpretation	Definitions	Code of Practice for Land Development and Subdivision Infrastructure	Support	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.	Delete definition as notified.
Kāinga Ora - Homes and Communities	16.02	Introduction and Interpretation	Definitions	Medium Density Housing	Oppose	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
Gareth Clarke*	19.02	Introduction and Interpretation	Definitions	Code of Practice, Subdivision, Land Use and Development	Support in part	While the removal of the reference to the previous Code of Practice bylaw is supported, if the Code of Practice is mentioned in the Plan, then it should be included in the definitions in some form. Otherwise, it is not clear to casual plan users what the document actually is, or at least what version should be referred to. The proposed changes do not appear to give an indication anywhere what version of the document is to be used when managing the effects of development on Council infrastructure i.e. is it only the latest/current version that is to be used, or is it the version that was in place when the Plan was written? That is to say, is there recourse for someone to consider only a previous version that may be more advantageous to their needs and/or more detrimental to the needs of the Council?	Include a definition for 'Code of Practice for Subdivision, Land Use, and Development' that clarifies what version/s are relevant.
Southland District Council	12.02	Infrastructure	Overview		Support	Support the inclusion of reference to the Code of Practice for Subdivision, Land Use and Development as the guiding document to aid developers in understanding the required level of service for these matters. This Code was developed jointly by Southland District Council and Invercargill City Council and there is benefit in harmonising the standards required for works and infrastructure required for new development in these neighbouring councils.	Retain the INF Infrastructure Overview as notified.
Environment Southland	11.04	Code of Practice			Support	Supports the reference to the Code of Practice for Subdivision, Land Use, and Development to replace reference to the expired ICC 2016/1 Bylaw.	Retain as notified.
National Public Health Service Te Waipounamu	14.01	Code of Practice			Support	Support all relevant parts that remove reference to the Invercargill City Council Bylaw 2016/1 Code of Practice for Land Development and Subdivision Infrastructure and replace it with the Code of Practice for Subdivision, Land Use, and Development. This allows greater flexibility to promote best practice design that improves outcomes for communities that can change over time without initiating a Plan Change.	Retain as notified.
Kāinga Ora - Homes and Communities	16.03	Subdivision	Rules	Overview	Support	Supports the amendments to refer to the most up-to-date Code of Practice.	Retain as notified.
Kāinga Ora - Homes and Communities	16.04	Subdivision	Rules	SUB-R3	Oppose in part	Seeks to add the word 'vacant' to clarify that the minimum lot sizes and dimensions only apply to vacant lot subdivision. Does not consider that a minimum allotment size should apply to any allotment created around residential units for which resource consent has been granted, and seeks amendments to SUB-R3 to reflect this. 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.	Amend as follows: SUB-R3 The following subdivision activities are restricted discretionary activities: 4. Within the Residential 1 Zone: Vacant allotments of equal to or greater than 350m² but

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							less than 400m² or more where: a. <u>Every allotment must be capable of containing an area with minimum dimensions of 15m x 15m</u> 5. <u>Within the Residential 1A Zone:</u> a. <u>Vacant a</u>~~l~~lotments of equal to or greater than 300m² where: i. <u>Every allotment must be capable of containing an area with minimum dimensions of 12m x 12m</u> 6. ~~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: ~~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, or~~ ~~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. but may be limited notified.</u>
Adrian Sheat RML	10.01	Subdivision	Rules	SUB-R6(7)	Oppose	SUB-R6(7) – Allotments Less Than 500m ² within Airport Control Boundaries. The proposed retention of SUB-R6(7), which restricts allotments of less than 500m ² within the Outer Control Boundary or the Single Event Sound Exposure Boundary, serves no practical planning purpose. The minimum lot size appears to be driven by airport-related considerations, yet it does not address noise effects or land-use compatibility. As such, the rule is unnecessary and should be removed.	Remove Rule SUB-R6(7).
Gareth Clarke*	19.03	Subdivision	Methods	SUB-M5	Support in part	Building on the submission point on the definition of the ‘Code of Practice, Subdivision, Land Use and Development’, what do the words ‘any’ and ‘relevant’ actually mean i.e. could it be interpreted that the 2016 Code of Practice Bylaw was relevant at the time the rules of the District Plan were written, so it is of relevant consideration?	Amend the provision to clarify how the relevant Code of Practice is to be determined.
National Public Health Service Te Waipounamu	14.02	Residential Zones	Overview		Support	Support the plan’s intention to enable Invercargill residents to enjoy a high standard of residential amenity, for well-functioning urban environments that in turn promote the future health and wellbeing of Invercargill people. Notes that all proposed Medium Density Zones are transected by Invercargill City Councils Urban bus service.	Retain as notified.
Kāinga Ora - Homes and Communities	16.05	Residential Zones	Overview		Support	Supports the notified amendments, such as the inclusion of “well-functioning urban environments” in line with NPS-UD.	Retain as notified.

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Gareth Clarke*	19.04	Residential Zones	Overview		Support in part	Considers that it is important to continue to provide a high level of residential amenity in Invercargill, even at higher residential densities. However, replacing the reference to “retaining the main qualities of this amenity” with “continuing to provide amenity” is indicative of an intention to enable some degree of erosion of existing residential amenity in the RES1A Zone so as to provide for increased residential density, opening the door for substandard urban design. Additionally, considers that a high standard of residential amenity is important for more than just “well-functioning urban environments”. It also creates inclusive and desirable places for a diverse population to live. A high standard of amenity is important in creating places residents can take pride in and be happy to call home, not just okay places to live.	Delete the phrase “continuing to provide amenity” and retain the existing reference to “retaining the main qualities of this amenity”.
Gareth Clarke*	19.05	Residential Zones	Objectives	RES-O1	Support in part	This objective as originally written appears to be seeking to limit the spread of residential environments outside of defined residential areas. The addition of the medium density housing reference has the effect of implying that medium density housing is to be enabled in all residential parts of the district, not just the RES1A Zone. If that is the case, why refer to medium density housing in this objective at all? If that is not the case, this needs to be clarified.	Either remove the phrase “medium density housing is enabled” or clarify that it is only enabled in the RES1A Zone, whichever is the relevant path.
Kāinga Ora - Homes and Communities	16.06	Residential Zones	Objectives	RES-O1	Support	Supports the notified amendments, in particular the inclusion of “medium density is enabled” to support housing choice and affordability.	Retain as notified.
Gareth Clarke*	19.06	Residential Zones	Objectives	RES-O2	Oppose	It is unclear what value the addition of “and built forms” adds to the objective. The objective as originally written appears to simply be implying that it’s anticipated that there will be a range of dwelling types, e.g. standalone dwellings, townhouses, duplexes, blocks of flats etc., all built in accordance with identified building standards, e.g. height etc. The addition of “and built forms” does therefore potentially lay the groundwork for taller apartment blocks etc. to be built as well. Additionally, the removal of “only” from the last sentence weakens the point that the original objective was trying to make, that Invercargill does not have the same growth pressures as other areas. This change alters the meaning slightly from one of “there’s not a lot going on so no need to go too crazy with the planning” to “we’re getting there, so let’s get ready for growth” (which may never come).	Retain objective as currently drafted in the Invercargill City District Plan.
National Public Health Service Te Waipounamu	14.04	Residential Zones	Objectives	RES-O2	Support in part	While the submitter supports the text that notes the population is slowly growing and ageing, this statement needs to reflect reference to Universal Design for the same reasons as the submitters previous submission point.	Amend as follows: A range of housing types and accessible built forms that include Universal Design principles.
Kāinga Ora - Homes and Communities	16.07	Residential Zones	Objectives	RES-O2	Support	Supports the notified amendments, enabling diversity in housing types and “built forms”.	Retain as notified.
Gareth Clarke*	19.07	Residential Zones	Objectives	RES-O3	Oppose	This change seems to indicate that the Council will now be accepting of lower levels of residential amenity and substandard urban design. Additionally, this objective applies generally to all residential zones so it should be kept general without reference in the individual zones. Objectives that speak to the anticipated character and outcomes of individual zones should be contained in the provisions relating to that zone.	Retain objective as currently drafted in the Invercargill City District Plan.

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Kāinga Ora - Homes and Communities	16.08	Residential Zones	Objectives	RES-O3	Support	Supports the removal of “high standard” for residential amenity, which recognises that providing this may impose additional costs on landowners and developers and thereby reduce housing affordability. 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.	Retain as notified.
Kāinga Ora - Homes and Communities	16.09	Residential Zones	Policies	RES-P2	Support	Supports providing for a range of housing densities and built forms to provide for housing choice and affordability.	Retain as notified.
Kāinga Ora - Homes and Communities	16.10	Residential Zones	Policies	RES-P4	Support	Supports the notified policy in line with RES-O3.	Retain as notified.
Gareth Clarke*	19.08	Residential Zones	Policies	RES-P4	Oppose	Same reasons as for RES-O3.	Retain policy as currently drafted in the Invercargill City District Plan.
Environment Southland	11.02	Residential 1 and 1A Zones - General			Support in part	Supports the intent to provide for addition urban development and high-quality urban design through PC2. Supports enabling greater density and diversity of housing; and good quality urban design outcomes as it aligns with the objectives, policies and Invercargill City Council’s responsibilities in the Urban Chapter of the SRPS. Specifically, Objectives URB.1, along with Policies URB.2, 3, 4, and 6. Refer to submission in full. Issue URB.3 of the SRPS states that “Urban areas in Southland which develop in ways that do not recognise the principles of high-quality urban design are likely to be less cohesive, can experience reduced amenity and cultural values and can fail to provide for a range of transportation modes.” Terminology used in the PC2 replaces “high-quality” with “good” urban design for RES 1 and 1A Zones. Furthermore, Policy URB.4 of the SRPS encourages “high quality design”.	Promote high quality urban design. Remove inconsistencies in the wording of “good” urban design applying to RES 1 and 1A zones.
IPI Properties LTD et al	17.03	Residential 1 and 1A Zones	Rules - General		Support in part	The submitter owns a substantial number of properties within the Residential 1 and 1A zone predominantly based in the south Invercargill area and details that there is considerable potential if the Council can create the right environment to develop these sections with affordable housing. Because of the cost of building new housing in Invercargill is the same if not higher than elsewhere but with the resulting property values in Invercargill, along with rental values being substantially below other major cities in New Zealand, it is important to try and create an incentive and make the financial feasibility of new housing development more attractive. The new Granny Flat Legislation and PC2 will help to facilitate this matter. It does seem, however, that there is one major anomaly that is necessary to achieve the full benefit and resulting advantages that could be created for the benefit of the city. There needs to be an appropriate acceptance of the density and number of units that can be established on a particular site for the reasons set out in the submission. It is strongly suggested that to achieve the full benefit of PC2 that it would make sense and, should be permissible, to have the 450 sq.m., land requirement per house reviewed to allow additional units to be built provided the same 40% building coverage is achieved as maximum density, with an example set out in the submission.	Review the 450m ² density requirement. Allow additional units to be built, provided the 40% building coverage standard is achieved.

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						It would make logical sense to ensure that reasonable density provisions are observed by maintaining the 40% coverage but allowing for an increased number of units to be built on the basis that the open space coverage is within 40% that is currently permissible for a single dwelling. It is strongly urged that this important aspect should be incorporated under PC2 for the reasons set out in the submission. It would, be attractive to developers, who would then have the incentive in terms of financial viability to look at developing sections for more housing, particularly in the inner city area which must make logical sense when under the existing District Plan there is no incentive to do this.	
Adrian Sheat RML	10.03	Residential 1 and 1A Zones	Rules - General	RES1Z-R5 and RES1AZ-R2	Oppose	Changing development between 350m² and 400m² from a discretionary to a restricted discretionary activity serves no meaningful planning outcome. In the Residential 1 Zone, the minimum lot size should be set at 350m², as the additional control does not materially improve amenity, infrastructure outcomes, or environmental effects. Given the existing bulk and location controls—such as site coverage limits, permeable surface requirements, yard setbacks, recession planes, and outdoor living space standards—minimum lot sizes are unnecessary. These controls already regulate development intensity and amenity outcomes effectively. Lot size should be market-driven rather than arbitrarily constrained. Refer to submission for example. Minimum lot sizes should be removed entirely from the Residential 1 and Residential 1A zones. Development intensity and amenity are already adequately controlled through bulk and location standards, making minimum lot size controls redundant.	Remove minimum lot sizes entirely from the Residential 1 and Residential 1A zones.
Kāinga Ora - Homes and Communities	16.11	Residential 1 Zone	Objectives	RES1Z-O5	Support	Supports the amendment from “high quality urban design” to “good quality urban design” to allow for more efficient and effective outcomes and encourage housing affordability.	Retain as notified.
Gareth Clarke*	19.09	Residential 1 Zone	Objectives	RES1Z-O5	Oppose	The mantra of the current District Plan, particularly in the RES1A Zone, is that high quality urban design is paramount. With respect to Medium Density Housing developments in the RES1A Zone, the intention of the Plan is that nothing should be off the table in terms of density and housing typology, provided its design is very well considered. The proposed changes to the Plan now talk about achieving a well-functioning urban area. But there appears to be a mismatch between the Residential Overview objectives and the RES1Z provisions. A well-functioning urban area is one in which there is high quality urban design. If we lower our expectations to only requiring “good” urban design, we’ll end up with just okay-functioning urban areas. This outcome does, however, seem to be entirely intentional i.e. the Council is happy to sacrifice the functionality of our residential areas in order to enable more density, including in the RES1 Zone. However, the proposal has not provided sufficient evidence to show that a reduction of urban design standards is actually necessary in order to achieve the higher densities sought.	Retain objective as currently drafted in the Invercargill City District Plan.
Kāinga Ora - Homes and Communities	16.12	Residential 1 Zone	Policies	RES1Z-P1	Oppose in part	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. Notes that much of the urban environment of Invercargill is zoned	Amend as follows: RES1Z-P1 Residential 1 Zone:

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						Residential 1 Zone, which is similar to ‘General Residential Zone’ under the National Planning Standards 2019. Therefore, removal of the term ‘suburban’ is sought. Seeks to incorporate RES1Z-P5 into this policy.	To provide for general residential living and housing choices by: ~~suburban residential development by zoning within the existing urban area for dwellings on lots 400m² in size or larger.~~ 4. Permitting two dwellings per site. 5. Allowing more dwellings per site when buildings are well designed to give effect to other relevant Objectives and Policies of the Residential 1 Zone. 6. Encouraging medium density housing within the Residential 1A Zone, and in the Residential 1B Zone. Explanation:... 6. ~~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.
Gareth Clarke*	19.10	Residential 1 Zone	Policies	RES1Z-P1	Oppose	The explanation as originally written appears to be saying that 400m² should be able to provide all the space a person needs to enjoy a good level of amenity in Invercargill, the implication being that by going below size you start to have to make tradeoffs with things like open space and sunlight etc. Therefore, all these things need to be considered (i.e. as a comprehensive package) when designing higher density development. The changes now proposed alter that explanation slightly by saying that people living in higher density situations have different needs in terms of sunlight and open space than those in ‘general’ residential living areas. Submitter agrees that those living in higher density living situations perhaps have a higher tolerance to reduced residential amenity, or are at least more willing to accept the tradeoffs in amenity needed to achieve a higher residential density, but they do still require these needs to be met, which could be, for example, in the form of additional artificial lighting and heating etc. that use more energy, or nearby access to public open space. These needs still exist to some degree and the fact that tenants of these developments may be more willing to accept these tradeoffs in amenity, and indeed in some cases actually prefer them, shouldn’t minimise the importance of encouraging as high an amenity as can practicably be achieved within these developments, and perhaps the best way of ensuring this is by requiring such developments to be comprehensively designed.	Retain policy as currently drafted in the Invercargill City District Plan.

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Kāinga Ora - Homes and Communities	16.13	Residential 1 Zone	Policies	RES1Z-P3	Support in part	The policy is too prescriptive and reads more as assessment criteria, noting that it is repeated under notified rule RES1AZ-R7. Amendments to the policy to provide clearer direction as to how the relevant objective can be met. Supports the urban design guidance sitting outside the district plan.	Amend as follows: RES1Z-P3 Urban Design: To ~~provide for encourage~~ <u>a range of residential buildings and structures including additions and alterations that good urban design in terms of:</u> <u>5. Provide healthy, sustainable and accessible living environments;</u> <u>6. Are compatible with the built environment anticipated in the Residential Zone;</u> <u>7. Contribute positively to a changing urban environment;</u> <u>8. Achieve safe and attractive streets.</u> ~~8.—Context~~ ~~9.—Character~~ ~~10.Choice~~ ~~11.Connections~~ ~~12.Creativity~~ ~~13.Custodianship~~ ~~14.Collaboration.~~ ~~40.Neighbourhood context~~ ~~41.Site layout~~ ~~42.Building design, including consideration of universal design~~ ~~43.Entries to buildings~~ ~~44.Visual and acoustic privacy~~ ~~45.Outdoor living space~~ ~~46.Access and parking~~ ~~47.Landscape treatment~~ ~~48.Site facilities~~
Gareth Clarke*	19.11	Residential 1 Zone	Policies	RES1Z-P3	Support in part	The changes to the list of key urban design elements to be considered is supported, however, the removal of any explanation within the Plan of what each of these terms mean and why they're important is not. The provision of the external urban design guidance is also supported, however, this type of external guidance can often be hard for applicant's to come by despite the Council's best intentions (e.g. website links get broken, staff turnover means it gets lost etc.). It is much more user friendly for applicants (and dare I say, decision makers) to retain at least some explanation of these elements in the District Plan itself.	Retain some form of explanation of the individual urban design elements listed in RES1Z-P3 in the District Plan itself.
Kāinga Ora - Homes and Communities	16.14	Residential 1 Zone	Policies	RES1Z-P5	Oppose in part	Opposes the stepped approach of density restrictions through minimum section sizes. The submitter has integrated this policy into RES1Z-P1, and therefore seeks this policy to be deleted.	Delete RES1Z-P5 in its entirety.
National Public Health Service Te Waipounamu	14.03	Residential 1 Zone	Policies	RES1Z-P5	Support in part	Support the explanation that notes a need to meet the needs of an ageing population. Given that as people age, they are more likely to become disabled, the submitter recommends this clause incorporates reference to Universal	After

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						Design as an Internationally Recognised solution that makes buildings accessible to all people of all abilities at any stage of life. It includes people who use wheelchairs or other mobility aids, people with impaired vision and people who are elderly or very young. Disabled people experience poorer health outcomes than non-disabled people, and they acutely feel these inequities. These outcomes are influenced by unfair barriers to full participation in society. While the detail in Section 3.5 of the Design Guide is supported, the submitter believes the issue to be of sufficient importance to be included in the text of the Plan itself, especially considering Invercargill's ageing population.	Well-designed detached, semi-detached, terraced housing and low-rise apartments are encouraged where they provide a high-quality living environment for residents. Add Given Invercargill's ageing population, the concept of Universal Design needs to be actively promoted.
Gareth Clarke*	19.12	Residential 1 Zone	Policies	RES1Z-P5	Oppose	The proposed plan change, and this policy in particular, seems to be trying to enable more ad-hoc higher density subdivision/housing, and in doing so risks limiting any consideration of how such ad-hoc developments relate to their surroundings, how they relate to their particular environmental context. A more ad-hoc approach to higher density development across all zones risks creating poor functioning places, which seems at odds with the above objectives of well-functioning places. The qualifier of “if poorly designed” in the explanation to this policy serves to weaken the point made in District Plan as currently drafted, being that on sites below 400m2 in Invercargill, you start to lose amenity and begin having to tradeoff elements of good design and amenity against each other, including important things in the Invercargill context, like access to daylight and solar gain. Further than that, the final sentence seems to strongly suggest that Council will in fact get in behind higher density housing, including low-rise apartments, with little consideration of the impact it has on the quality of the living environment of any existing neighbours, provided the residents of the new development themselves have a high-quality living environment. That is to say, the Council is prepared to trade the living environment of existing residents for that of new residents. To minimise the risks that the encouragement of ad-hoc medium density housing has on existing residential character and amenity, the Council needs to allow itself to be more circumspect in what medium density developments it supports by encouraging medium density housing developments (i.e. not just medium density housing on its own) that are comprehensively planned and designed to a standard higher than just the listed minimum performance standards, which effectively become the target design level for a lot of developers.	Retain the policy as currently drafted in the Invercargill City District Plan.
Kāinga Ora - Homes and Communities	16.15	Residential 1 Zone	Policies	RES1Z-P7	Oppose in part	Seeks that the site coverage is increased to 50% for Residential 1A zone as per the relief sought in RES1AZ-R16.	Amend as follows: RES1Z-P7 Space Around Buildings: To maintain the residential scale and amenity of space around and between buildings. Explanation: 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%~~ <u>50% (in the Residential 1A Zone)</u> of the

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							site is covered in buildings. Excessive building coverage has other undesirable effects, such as overloading the City's stormwater reticulation system.
Ministry of Education	18.01	Residential 1 Zone	Rules	RES1Z-R2	Neutral	Neutral with regards to intensification in principle, however, seek a more permissive activity status for educational facilities within the RES1Z and RES1AZ zones. The current discretionary activity status does not provide for educational facilities. Requests that educational facilities are enabled in the RES1Z and RES1AZ zones to better serve the education needs of the residential community without added cost and uncertainty that comes with a discretionary activity status. Provision of a separate rule for educational facilities, or amendment to the existing rule, as a restricted discretionary activity would provide Council and the community sufficient and appropriate assurance that the potential and actual effects of a new educational facility would be considered through a resource consent process. While the Ministry can (and is likely to) utilise the Notice of Requirement process provided for under s168 of the RMA for the development of new educational facilities, this does not negate the need for educational facilities to be specifically provided for within residential zones. The inclusion of enabling provisions for educational facilities within the residential zone chapters would thereby assist both the territorial authority and the Ministry in enabling future educational facilities within the Invercargill district.	Amend RES1Z-R2 as outlined below: RES1Z-R2 Discretionary Activities: The following are discretionary activities in the Residential 1 Zone: ~~5. Educational Activity other than those on sites listed in APP10 – Appendix 10 Educational Activity (Existing)~~ <u>RES1Z-RXX</u> <u>Restricted Discretionary Activities:</u> <u>The following is a restricted discretionary activity in the Residential 1 Zone:</u> <u>1. Educational Activity other than those on sites listed in APP10 – Appendix 10 Educational Activity (Existing)</u> <u>Matters of discretion are restricted to:</u> <u>1. the location of landscaping; and</u> <u>2. any adverse effects on the streetscape; and</u> <u>3. any adverse effects on the amenity values for neighbouring sites; and</u> <u>4. the operation of the activity, including the effects of noise, lighting and from the generation of traffic.</u>
Kāinga Ora - Homes and Communities	16.16	Residential 1 Zone	Rules	RES1Z-R5 to RES1Z-R8	Oppose in part	Opposes the minimum density proposed and considers that the tiered density approach is overcomplicated. 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. 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.	Amend as follows: ~~<u>Residential Density</u>~~ <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~~ <u>a restricted discretionary activity.</u> Advice Note: <u>Any application arising from this rule is precluded from public and limited notification but may be limited notified.</u> ~~RES1Z-R7 Where the residential density is one residence on a site less than 350m² under contiguous ownership then it is a non-complying discretionary activity.~~

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							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:...~~
Kāinga Ora - Homes and Communities	16.18	Residential 1A Zone	Issues	RES1AZ-I2	Support in part	Notes that the word ‘comprehensively’ has been proposed by Council to be deleted from other provisions. Seeks the same in this provision for consistency.	Amend as follows: RES1AZ-I2 Medium density housing (<u>especially larger scale proposals of 4 or more units</u>) can lead to decrease in amenity unless ~~it is they are well-~~ planned, ~~and well-~~ designed, ~~and larger scale proposals of 4 or more residences are developed comprehensively.~~
Kāinga Ora - Homes and Communities	16.19	Residential 1A Zone	Objectives	RES1AZ-O3	Support	Supports this policy as notified to increase housing stock through medium density redevelopment.	Retain as notified.
Kāinga Ora - Homes and Communities	16.20	Residential 1A Zone	Objectives	RES1AZ-O4	Support in part	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. Otherwise supports the notified objective.	Amend as follows: RES1AZ-O4 ~~The Residential 1A (Medium d~~ Density ~~Housing) Zone developments are is a~~ well designed, ~~higher density residential living environment which:~~ <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 high level of amenity to the residents in the new units and maximising beneficial effects, and minimising adverse effects, on the surrounding neighbourhood.</u>
Gareth Clarke*	19.13	Residential 1A Zone	Objectives	RES1AZ-O4	Oppose	The proposed changes to the objective appear to have the effect of turning the RES1A Zone from a residential zone where some medium density development could occur under the right circumstances, to an out and out medium density housing zone where existing residential character and amenity is up for grabs. This is a significant change in approach to land use management in these zones and the evidence supporting such a change needs to be carefully considered so as to ensure the amenity currently enjoyed by residents of these areas is not unnecessarily and wantonly eroded.	Retain the policy as currently drafted in the Invercargill City District Plan.
Kāinga Ora - Homes and Communities	16.21	Residential 1A Zone	Policies	RES1AZ-P1	Support in part	Notes that the word ‘comprehensively’ has been proposed by Council to be deleted from other provisions. Seeks the same in this provision for consistency. 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 airport-related noise”, that other chapters within the district plan address this.	<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 ~~or a~~ areas identified on the District Planning Maps ~~as hazard free and not subject to airport-related noise, and~~

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							~~4. As a comprehensively planned development comprising multiple 4 or more residences~~ ~~5. Within approximately 450 metres (approximately five minutes' walk) of the nearest zone boundary of the Business 2 Zone at South City~~ ~~6. Within approximately one kilometre (just over 10 minutes' walk) of the City Centre Priority Redevelopment Precinct.~~
Kāinga Ora - Homes and Communities	16.22	Residential 1A Zone	Policies	RES1AZ-P2	Oppose	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.”	Delete RES1AZ-P2 in its entirety.
Gareth Clarke*	19.14	Residential 1A Zone	Policies	RES1AZ-P2	Support in part	See reasons for RES1Z-P3, though the first sentence could be amended to include the matters referred to in RES1AZ-O4 directly so that the policy can be read and understood on its own.	Retain some form of explanation of the individual urban design elements listed in RES1Z-P3 in the District Plan itself, and either delete the addition to the first sentence or amend it so it can be easily read and understood on its own.
Gareth Clarke*	19.15	Residential 1A Zone	Rules		Support in part	Supported only to the extent that the RES1A Zone continues to be a dedicated “medium density housing zone” in the District Plan.	Retain RES1A rules as currently drafted in the District Plan. -
Kāinga Ora - Homes and Communities	16.17	Residential 1A Zone	Rules	Overview	Oppose in part	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.	Amend as follows: 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...~~
Kāinga Ora - Homes and Communities	16.23	Residential 1A Zone	Rules	RES1AZ-R1 to RES1AZ-R4	Oppose	Seeks to remove the minimum density requirements. The notified density rule is considered to be overly complicated and does not provide for the intended outcomes that PC2 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. The performance standards are adequate to provide for good quality urban form.	Delete RES1AZ-R1 to RES1AZ-R4 in their entirety.
Kāinga Ora - Homes and Communities	16.24	Residential 1A Zone	Rules	RES1AZ-R5	Support in part	Supports using the number of units as a method of managing the effects of medium density development. Considers that the words ‘units’ and ‘residential units’ are easier for plan-users to understand and more commonly used in district plans than ‘residences’. Opposes universal design and acoustic privacy as these matters are best addressed under the Building Act.	Amend as follows: ~~Number of Residences~~ Units Per Site RES1AZ-R5 The maximum number of permitted <u>residential units</u> ~~ees~~ per site is 3. RES1AZ-R6 4 or more <u>residential units</u> ~~ees~~ per site is a restricted discretionary activity.

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							<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> <u>3. The extent to which the application achieves good urban design outcomes, including in relation to:</u> <u>1. Neighbourhood character</u> <u>2. Connectivity</u> <u>3. Site layout</u> <u>4. Building location</u> <u>5. Relationship to neighbouring buildings</u> <u>6. Visual and acoustic privacy</u> <u>7. Access to solar gain</u> <u>8. Car parking and vehicle access</u> <u>9. On-site outdoor space</u> <u>10. Entries to buildings</u> <u>13. Outdoor storage and accessory buildings</u> <u>14. Landscaping</u> <u>a. Neighbourhood context</u> <u>b. Site layout</u> <u>c. Building design, including consideration of universal design</u> <u>d. Entries to buildings</u> <u>e. Visual and acoustic privacy</u> <u>f. Outdoor living space</u> <u>g. Access and parking</u> <u>h. Landscape treatment</u> <u>i. Site facilities</u> <u>4. 13. The provision of infrastructure quantum of impermeable surface and measures undertaken to address stormwater issues</u> <u>3. Vehicle access and traffic impacts</u>
Kāinga Ora - Homes and Communities	16.25	Residential 1A Zone	Rules	RES1AZ-R8 to 11	Oppose in part	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. 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	Amend as follows: <u>RES1AZ-R10 Where an activity does not comply with RES1AZ-R8 and/or RES1AZ-R9 above, the activity is a restricted discretionary activity.</u>

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						discretion (as notified) provide good guidance to enable good urban form. 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.	RES1AZ-R11 Applications under RES1AZ-R10 above shall address the following matters, ~~which will be among those taken into account by the Council~~ over which Council will restrict its discretion: 5. The extent to which practicable outdoor living is achieved 6. Access to acceptable levels of daylight and sunlight 7. The extent to which a designated outdoor living space not meeting RES1AZ-R8 and/or RES1AZ-R9 is mitigated by communal outdoor living space ~~where this is proposed~~. 8. The extent to which the development achieves good urban design outcomes
Kāinga Ora - Homes and Communities	16.26	Residential 1A Zone	Rules	RES1AZ-R12 to 15	Oppose in part	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. 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. 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.	Amend as follows: <u>Space Around Buildings</u> RES1AZ-R12 3. A yard at least 2 metres deep shall be provided along the front (road) boundary of the site 4. A yard of at least ~~4.5~~ 1 metre deep shall be provided along all other boundaries of the site. ~~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.~~ RES1AZ-R13 A yard at least 4 metres deep shall be provided along all side and rear boundaries of any site containing a non-residential activity. RES1AZ-R14 Where an activity does not comply with RES1AZ-R12 or RES1AZ-R13, the activity is a <u>restricted discretionary activity</u>. RES1AZ-R15 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:...
National Public Health Service Te Waipounamu	14.05	Residential 1A Zone	Rules	RES1AZ-R15	Support	Particularly supports this proposed provision as it relates to considerations for passive solar gain for dwellings as that is conducive to warm homes that in turn reduces the risk of hospital admissions attributable to housing. Cold homes exacerbate chronic conditions and are linked to increased respiratory and cardiovascular illnesses, mental health conditions, higher rates of infectious diseases, hospital admissions, and excess winter deaths, especially in older adults and disabled people.	Retain as notified.

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Kāinga Ora - Homes and Communities	16.27	Residential 1A Zone	Rules	RES1AZ-R16 to 19	Oppose in part	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. 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. 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.	Amend as follows: <u>Site Coverage</u> RES1AZ-R16 Maximum coverage of all buildings on the site shall not exceed ~~45~~ 50 % of net site area. ~~RES1AZ-R17 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.~~ RES1AZ-R18 Where the coverage of all buildings on the site exceeds 50% then it is a ~~restricted discretionary non-complying~~ activity. RES1AZ-R19 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:...
National Public Health Service Te Waipounamu	14.06	Residential 1A Zone	Rules	RES1AZ-R19	Support	These proposed provisions relate to considerations for passive solar gain for dwellings as that is conducive to warm homes that in turn reduces the risk of hospital admissions attributable to housing.	Retain as notified.
Gareth Clarke*	19.16	Residential 1A Zone	Rules	RES1AZ-R20	Support in part	Supported only to the extent that the RES1A Zone continues to be a dedicated “medium density housing zone” in the District Plan, though it is noted that the proposed rule results in the slightly perverse situation whereby the maximum height of buildings and structures in the RES1A Zone is 1m higher than it is in the main business zone of the CBD. It is also noted that due to the proposed changes to the recession planes that apply to the RES1A Zone, residents within this zone appear to potentially have more of a right to daylight and sunlight than the residents of the RES1 Zone who neighbour the RES1A Zone (i.e. the recession plan applying to sites in the Business 1 Zone adjoining the RES1A Zone is much lower than that applying to RES1A Zone sites adjoining the RES1 Zone – noting that there are actually no RES1 Zone properties directly adjoining the RES1A Zone).	Retain RES1A rules as currently drafted in the District Plan
Kāinga Ora - Homes and Communities	16.28	Residential 1A Zone	Rules	RES1AZ-R20 to 21	Support	Supports this rule in providing for design variation, while managing the height of buildings and potential effects on adjacent properties.	Retain as notified.
Kāinga Ora - Homes and Communities	16.29	Residential 1A Zone	Rules	RES1AZ-R22 to 24	Oppose in part	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. 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. 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.	Amend as follows: <u>Permeable Surfaces</u> RES1AZ-R22 The minimum area of permeable surface is ~~32~~ 20 % of the gross site area. RES1AZ-R23 Where the area of permeable surface is to be less than ~~32~~ 20 % of the gross site area, then the activity is a ~~restricted discretionary~~ activity.

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Kāinga Ora - Homes and Communities	16.30	Residential 1A Zone	Rules	RES1AZ-R25 to 29	Oppose in part	Supports the outlook standards but opposes the inclusion of the glazing standards. Considers that the rule may result in designs that are functionally inappropriate and which do not achieve the intended outcomes of the rule.	Amend the heading as follows: ~~Outlook and Glazing...~~ Delete Rules RES1AZ-R28 and 29 in their entirety.
Adrian Sheat RML	10.02	Appendices	Appendix 11	Appendix 11-3	Oppose	Appendix 11-3 – Private Ways and Rights of Way. The proposed new table in Appendix 11-3 introduces a minimum legal width of 6.0m for private ways and rights of way in Rural and Rural Lifestyle areas. This directly contradicts the Code of Practice, which specifies a minimum legal width of 3.5m in Table 5.4 of the Policy. This inconsistency creates uncertainty and should be resolved to ensure alignment between the District Plan and the Policy.	Resolve the inconsistency in Appendix 11-3 for the minimum legal width for private ways and right of ways in rural and lifestyle areas.
John Gerty	05.01	Zones	Rezoning		Support in part	Support this but think the southern boundary should run down to the hospital especially on Elles Road as the shops and buses would benefit from the extra people. The housing stock is too old and poor quality here so it needs encouragement to develop.	Expand the zones by extending the southern boundary to run down to the hospital especially on Elles Road.
Colin Bishop	06.01	Zones	Rezoning		Support in part	Partly support PC2 but recommend that it be amended to include some areas currently zoned Rural, that are on the very edge and in some cases surrounded by Residential 1 zoned properties, be rezoned to Residential 1 zoning to enable greater density and diversity of housing choice in the Residential 1 zone. The east side of Bain Street between Stirrat Street and Ball Street is one such area. The west side of Bain Street is zoned Residential 1. Over 50% of the east side of Bain Street is also zoned Residential 1. The Balance of the properties on the East side of Bain Street are zoned Rural. This area has reticulated sewage/stormwater and reticulated drinking water, is within easy walking distance of South City, early childhood centres and schools. If the east side of the street that is currently zoned rural is changed to Residential it will enable greater density and diversity of housing choice which is the main purpose of the planning change proposed. While allowing more intensive housing in Residential zones 1 and 1A is one option there are places currently zoned rural that are adjacent to Residential zone 1 properties and in some cases on three sides that could be changed to Residential zone 1.	Amend PC2 to rezone the properties zoned rural along the east side of Bain Street between Stirrat Street and Ball to Residential 1.
Sharon R. Anaru Hill	08.01	Zones	Residential 1A Zone		Oppose	Oppose Zone 1A being part of the changes proposed. The re-zoning for higher density in this zone will take away the sense of community and put extra pressure on resources and safety long term.	Remove area 1A from the change to higher density or at the very least do a finer catchment of it.
Environment Southland	11.06	Zones			Oppose	Conscious that there are areas proposed for housing intensification within PC2 (particularly between Tay and Tweed Streets) that are within the potentially floodable area of the Otepunī Creek. Environment Southland opposes any intensification in potentially floodable areas as it is contrary to Policies NH.3, NH.4, NH.5 and NH.6 of the SRPS which requires a precautionary approach, avoiding significant risk and mitigating natural hazard effects. Intensification of residential dwellings should not occur within an identified natural hazard location as it is contrary to the SRPS.	Oppose the proposed changes to properties between Tay and Tweed Streets from PC2 due to these properties being within a potentially floodable area from the Otepunī Creek. Changes are requested to remove areas between Tay and Tweed Street from PC2 as they are identified as potentially floodable by the Otepunī Creek.