

**23 December 2022**

Attn: Fiona Hill and Alex Bell  
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*Submission sent via email: [DistrictPlan@waitomo.govt.nz](mailto:DistrictPlan@waitomo.govt.nz)*

**KĀINGA ORA – HOMES AND COMMUNITIES SUBMISSION ON A NOTIFIED  
PROPOSAL FOR THE PROPOSED WAITOMO DISTRICT PLAN UNDER CLAUSE  
6 OF SCHEDULE 1 OF THE RESOURCE MANAGEMENT ACT 1991**

**This is a submission on the Proposed Waitomo District Plan (“PWDP”) from Waitomo  
District Council (“the Council” or “WDC”):**

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

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

**The specific provisions of the proposal that this submission relates to:**

The Proposed Waitomo District Plan in its entirety.

**This document and the Appendices attached is Kainga Ora submission on PWDP.**

**The Kāinga Ora submission is:**

1. Kāinga Ora Homes and Communities (“**Kāinga Ora**”) is a Crown Entity and is required to give effect to Government policies. Kāinga Ora has a statutory objective that requires it to contribute to sustainable, inclusive, and thriving communities that:
  - (a) Provide people with good quality, affordable housing choices that meet their diverse needs; and
  - (b) Support good access to jobs, amenities and services; and
  - (c) Otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.
2. Because of these statutory objectives, Kāinga Ora has interests beyond its role as a public housing provider. This includes a role as a landowner and developer of residential housing and as an enabler of quality urban developments through increasing the availability of build-ready land across the Waikato region.
3. Kāinga Ora therefore has an interest in the PWDP and how it:
  - (a) Gives effect to the National Policy Statement on Urban Development (“**NPS-UD**”);
  - (b) Minimises barriers that constrain the ability to deliver housing development across the public housing, affordable housing, affordable rental, and market housing; and
  - (c) Provides for the provision of services and infrastructure and how this may impact on the existing and planned communities, including Kāinga Ora housing developments.
4. This submission seeks amendments to the PWDP in the following matters:
  - (a) **Definitions** – Kāinga Ora seeks amendments to a number of definitions that are not consistent with those under the National Planning Standards. Kāinga Ora seek the deletion of the Co-housing development, Compact housing developments, Noise sensitive activity, Papakāinga units, Tiny house and the Tiny house development definitions from the District Plan. The removal of dwelling numbers within the definition is also sought;

- (b) **Removal of density controls** – Kāinga Ora seeks the removal of the density controls, except for areas outside of the reticulated sewerage system, and considers that the performance standards should guide development to be in line with what is anticipated within the zone; and
  - (c) **Subdivision activity statuses** – Kāinga Ora seeks that the activity status of ‘controlled’ should be applied where subdivision standards are met and complied. Where standards are not complied with, an activity status of Restricted Discretionary is considered appropriate.
5. The changes requested are made to:
- (a) Ensure that Kāinga Ora can carry out its statutory obligations;
  - (b) Ensures that the proposed provisions are the most appropriate way to achieve the purpose of the Resource Management Act 1991;
  - (c) Reduce interpretation and processing complications for decision makers so as to provide for plan enabled development;
  - (d) Provide clarity for all plan users; and
  - (e) Allow Kāinga Ora to fulfil its urban development functions as required under the Kāinga Ora–Homes and Communities Act 2019.
6. The Kāinga Ora submission points and changes sought can be found within Table 1 of **Appendix 1** which forms the bulk of the submission.

**Kāinga Ora seeks the following decision from Waitomo District Council:**

That the specific amendments, additions or retentions which are sought as specifically outlined in **this submission and Appendix 1**, are accepted and adopted into the PWDP, including such further, alternative or consequential relief as may be necessary to fully achieve the relief sought in this submission.

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

Kāinga Ora seeks to work collaboratively with the Council and wishes to discuss its submission on the PWDP to address the matters raised in its submission.

If others make a similar submission, Kāinga Ora will consider presenting a joint case with them at a hearing.



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**Brendon Liggett**  
**Manager – Development Planning**  
**Kāinga Ora – Homes and Communities**

**ADDRESS FOR SERVICE:** *Kāinga Ora – Homes and Communities, PO Box 74598, Greenlane, Auckland 1051. Email: [developmentplanning@kaingaora.govt.nz](mailto:developmentplanning@kaingaora.govt.nz)*

## **Appendix 1: Decisions sought in the PWDP**

The following table sets out the amendments sought to the PWDP and also identifies those provisions that Kāinga Ora supports.

*Proposed changes are shown as ~~strikethrough~~ for deletion and underlined for proposed additional text.*

Table 1

ID	Section of Plan/Term	Specific Provision	Support/ Support in Part/ Oppose	Reasons	Relief Sought <i>Proposed changes are shown as <del>strikethrough</del> for deletion and <u>underlined</u> for proposed additional text.</i>
<b>Chapter 9 – Definitions</b>					
1.	<b>Allotment shape factor</b>	means the minimum shape requirement of an allotment to ensure the factor shape of the allotment is suitable for use.	Support	Kāinga Ora generally supports the inclusion of the term and definition.	Retain as notified.
2.	<b>Co-housing development</b>	means more than two but no more than six self-contained household units development located on one site or holding which are either grouped together into one main building, joined as duplex dwellings or terraced dwellings or are detached private homes. Residents share common facilities which support daily life including but not limited to shared lounge/dining spaces, laundries, workshops,	Oppose	<p>Kāinga Ora considers this to be a form of residential development and does not need to be defined independently of any other residential use.</p> <p>More specifically, the concept of co-housing should not be limited to a range of 2-6 household units. Kāinga Ora seeks the term and definition is deleted. This does not need to be exclusively identified.</p> <p>Consequential amendments will need to be made throughout the PWDP to reflect changes sought.</p>	<p>Delete definition in its entirety.</p> <p><del>means more than two but no more than six self-contained household units development located on one site or holding which are either grouped together into one main building, joined as duplex dwellings or terraced dwellings or are detached private homes. Residents share common facilities which support daily life including but not limited to shared lounge/dining spaces, laundries, workshops, studios, gardens, BBQ areas, open space and play areas.</del></p>

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		studios, gardens, BBQ areas, open space and play areas. Residents own and manage their co-housing community collectively.			<del>Residents own and manage their co-housing community collectively.</del>  Consequential amendments will need to be made throughout the PWDP to reflect changes sought.
3.	<b>Compact housing developments</b>	means <u>more than two but no more than six self-contained residential developments</u> units located on one site or holding where the design of buildings, their layout, access and relationship to one another has been planned in a comprehensive manner to achieve compatibility. The household units may be duplex or terraced dwellings, apartments, town houses or detached private homes, but excludes retirement villages.	Oppose	Kāinga Ora considers this to be a form of residential development and does not need to be defined independently of any other residential use. Kāinga Ora seeks the term and definition is deleted. This does not need to be exclusively identified. The term of residential activity should encompass all forms of housing developments.  Consequential amendments will need to be made throughout the PWDP to reflect changes sought.	Delete definition in its entirety.  <del>means more than two but no more than six self-contained residential developments units located on one site or holding where the design of buildings, their layout, access and relationship to one another has been planned in a comprehensive manner to achieve compatibility. The household units may be duplex or terraced dwellings, apartments, town houses or detached private homes, but excludes retirement villages.</del>

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					Consequential amendments will need to be made throughout the PWDP to reflect changes sought.
4.	<b>Impermeable surfaces</b>	<p>Adopted majority of the proposed wording:</p> <p>means a surface that is not vegetated, does not infiltrate runoff, and prevents or significantly slows the soakage of water into the ground. This includes:</p> <p>(a) roofs; and</p> <p>(b) paved areas including driveways and sealed/compacted metal parking areas; and</p> <p>(c) patios; and</p> <p>(d) sealed and compacted metal roads; and</p> <p>(e) layers engineered to be impervious such as highly-compacted soil.</p>	Support in Part	Kāinga Ora generally supports the inclusion of a definition for impermeable surfaces; however, suggest the following amendments in order for the definition to be consistent with definitions used elsewhere across the country.	<p>Amend the definition as follows:</p> <p>means a surface that is not vegetated, does not infiltrate runoff, and prevents or significantly slows the soakage of water into the ground. This includes:</p> <ul style="list-style-type: none"> <li>a. roofs; and</li> <li>b. paved areas including driveways and sealed/compacted metal parking areas; and</li> <li>c. patios; and</li> <li>d. sealed and compacted metal roads; and</li> <li>e. layers engineered to be impervious such as highly-compacted soil.</li> </ul> <p>But excludes:</p> <ul style="list-style-type: none"> <li>f. wooden decks with spacing between boards of 4mm or more,</li> </ul>



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		But excludes: (f) wooden decks with spacing between boards of 4mm or more, where water is allowed to drain through to a permeable surface below the deck; and (g) porous or permeable paving and living roofs; and (h) permeable artificial surfaces, fields or lawns; and (i) swimming pools, ponds and dammed water.			where water is allowed to drain through to a permeable surface below the deck; g. <u>grass and bush areas</u> ; h. <u>gardens and other vegetated areas</u> ; i. porous or permeable paving and living roofs; j. permeable artificial surfaces, fields or lawns; k. slatted decks; l. swimming pools, ponds and dammed water; <u>and</u> m. <u>rain tanks</u> .
5.	<b>Marae Complex</b>	an area of land set apart for the common use of mana whenua of Waitomo district, and includes a complex of buildings such as wharenuī (meeting house), wharekai (dining hall), wharepaku (ablution block), and/or other accessory buildings generally associated with a	Support in part	Kāinga Ora considers that the definition for Marae Complex should include papakāinga housing development. This is reflective of traditional marae developments. The definition should also include reference to wharemoē (sleeping areas for manuhiri).	Amend definition as follows:  an area of land set apart for the common use of mana whenua of Waitomo district, and includes a complex of buildings such as wharenuī (meeting house), wharekai (dining hall), wharepaku (ablution block), <u>papakāinga housing, wharemoē (visitors sleeping area)</u> and/or other

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		marae or pa, but excludes papakāinga housing developments.			accessory buildings generally associated with a marae or pa., <del>but excludes papakāinga housing developments.</del>
6.	<b>Noise sensitive activity</b>	residential units and minor residential units, boarding houses, co-housing developments, compact housing developments, retirement villages, visitor accommodation, papakāinga units and papakāinga housing developments, residential based visitor accommodation, managed care facilities and other buildings used for residential activities but excludes: (a) Camping grounds. (b) Tiny houses and tiny house developments. (c) Marae complex. (d) Community facilities. (e) Educational facilities. (f) Hospitals	Oppose	Kāinga Ora seeks the deletion of this definition as there is no evidence that there are noise generating activities that impact on the operation of these activities.  Consequential amendments will need to be made throughout the PWDP to reflect changes sought and deletion of any activity and term in the PWDP.	Delete definition in its entirety.  <del>residential units and minor residential units, boarding houses, co-housing developments, compact housing developments, retirement villages, visitor accommodation, papakāinga units and papakāinga housing developments, residential based visitor accommodation, managed care facilities and other buildings used for residential activities but excludes:</del> <del>(a) Camping grounds.</del> <del>(b) Tiny houses and tiny house developments.</del> <del>(c) Marae complex.</del> <del>(d) Community facilities.</del> <del>(e) Educational facilities.</del> <del>(f) Hospitals</del>

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					Consequential amendments will need to be made throughout the PWDP to reflect changes sought.
7.	<b>Papakāinga housing development</b>	a residential development comprising more than two but no more than six individual papakāinga units which supports traditional Maori cultural living for a recognised mana whenua group residing in Waitomo district.	Oppose in part	<p>Defining Papakāinga housing development as a specified density is not in accordance with the Te Reo Māori term. A maximum of six units is not papakāinga and does not foster a traditional papakāinga community; the inclusion of a density within the definition should be removed.</p> <p>Kāinga Ora seeks amendments to the definition and that the words ‘housing development’ can be deleted/dropped off. Keep the term as ‘papakāinga’.</p>	<p>Amend definition as follows:</p> <p><u>Papakāinga</u>  <u>A development by tangata whenua to be occupied by tangata whenua for residential activities and ancillary social, cultural, economic, conservation and/or recreation activities to support the cultural, environmental and economic wellbeing of tangata whenua.</u></p>
8.	<b>Papakāinga units</b>	means residential accommodation which supports traditional Maori cultural living for a recognised mana whenua group residing in Waitomo district. For the avoidance of doubt, individual papakāinga units must contain a bedroom and separate	Oppose	Kāinga Ora does not consider a separate definition for Papakāinga unit to be required in addition to the suggested definition for Papakāinga. Kāinga Ora seeks deletion of this definition. The definition is not required and does not need to mention Waitomo District.	<p>Delete definition in its entirety.</p> <p><del>means residential accommodation which supports traditional Maori cultural living for a recognised mana whenua group residing in Waitomo</del></p>

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		bathroom including a toilet, sink and shower but are not required to contain a kitchen where communal kitchen facilities are available on the site.		Consequential amendments will need to be made throughout the PWDP to reflect changes sought.	<del>district. For the avoidance of doubt, individual papakāinga units must contain a bedroom and separate bathroom including a toilet, sink and shower but are not required to contain a kitchen where communal kitchen facilities are available on the site.</del>  Consequential amendments will need to be made throughout the PWDP to reflect changes sought.
9.	<b>Tiny house</b>	means self-contained residential accommodation which is a maximum of 20 m <sup>2</sup> gross floor area at ground floor level, and is: (a) Built on a chassis, on wheels and can be towed by a vehicle, but is not motorised itself; and (b) Not intended to be permanently located on any	Oppose	Kāinga Ora questions the use and inclusion of this term within the plan. Kāinga Ora also questions how a tiny house cannot be deemed a building and why the Council does not expect it to be on a permanent foundation when it could be permanently located on a site.	Delete definition in its entirety.  <del>means self-contained residential accommodation which is a maximum of 20 m<sup>2</sup> gross floor area at ground floor level, and is: (a) Built on a chassis, on wheels and can be towed by a vehicle, but is not motorised itself; and (b) Not intended to be permanently located on any site or attached to the</del>

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		<p>site or attached to the ground on a permanent foundation. For the avoidance of doubt a tiny house is not a second-hand relocated building, a mobile home, a house bus, a recreational vehicle (RV), a trailer type RV, a caravan or a pop-top trailer. Note: Where building work is carried out (for example to join two tiny houses together by a walkway or create a permanent deck) or where kitchen and bathroom plumbing fittings need to be connected to reticulated water or wastewater systems or septic tank systems, the tiny house becomes a building.</p>		<p>Further clarification and consideration to be given to the inclusion of tiny house with dwelling and minor dwelling terms.</p> <p>Kāinga Ora seeks that a residential unit or dwelling could include and describe a typology such as a tiny house to be located on a site, and how subdivision rules will operate with such typology on site.</p>	<p><del>ground on a permanent foundation. For the avoidance of doubt a tiny house is not a second-hand relocated building, a mobile home, a house bus, a recreational vehicle (RV), a trailer type RV, a caravan or a pop-top trailer. Note: Where building work is carried out (for example to join two tiny houses together by a walkway or create a permanent deck) or where kitchen and bathroom plumbing fittings need to be connected to reticulated water or wastewater systems or septic tank systems, the tiny house becomes a building.</del></p> <p><u>ground on a permanent foundation. For the avoidance of doubt a tiny house is not a second-hand relocated building, a mobile home, a house bus, a recreational vehicle (RV), a trailer type RV, a caravan or a pop-top trailer. Note: Where building work is carried out (for example to join two tiny houses together by a walkway or create a permanent deck) or where kitchen and bathroom plumbing fittings need to be connected to reticulated water or wastewater systems or septic tank systems, the tiny house becomes a building.</u></p> <p>Consequential amendments will need to be made throughout the PWDP to reflect changes sought.</p>

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10.	<b>Tiny house development</b>	means more than two but no more than six tiny houses on a site or development holding.	Oppose	<p>Kāinga Ora does not support the inclusion of a density control within a definition, and does not consider the definition is necessary.</p> <p>Consequential amendments will need to be made throughout the PWDP to reflect changes sought.</p>	<p>Delete definition in its entirety.</p> <p><del>means more than two but no more than six tiny houses on a site or development holding.</del></p> <p>Consequential amendments will need to be made throughout the PWDP to reflect changes sought.</p>
<b>Chapter 29 – Subdivision</b>					
11.	<b>SUB-P4</b>		Oppose	<p>Kāinga Ora does not support the use of minimum lot sizes and furthermore, does not consider it necessary to have Papakāinga and tiny house developments within a separate subsection.</p>	<p>Amend provision as follows:</p> <p>In all zones, avoid subdivision that creates <u>vacant</u> allotments <u>that are unable to contain a permitted household unit.</u></p> <p><del>in the following situations:</del></p> <p><del>1. In townships, minor residential units are ancillary to the principal dwelling and provide an opportunity for the</del></p>

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					<p><del>economic and social benefit of the property owner. Subdivision of minor residential units where the minimum allotment size for the zone cannot be achieved should be avoided in order to retain the built character and scale that is consistent with the surrounding residential environment; and</del></p> <p><del>2. Papakāinga and tiny house developments are provided as part of a range of innovative housing choices offered by this plan. Subdivision of individual tiny houses or papakāinga units where the minimum allotment size cannot be achieved should be avoided to prevent compromising the character and amenity values of the underlying zone</del></p>
12.	<b>SUB-R1- Residential, settlement &amp; tourism zones</b>	Subdivision to create allotments in all zones	Oppose in Part	Kāinga Ora considers the activity status of controlled should be applied where standards are complied with.	Amend provision as follows:  <del>Restricted Discretionary:</del> <u>Controlled:</u>  <b>Where:</b> 1. All of the performance standards in SUB - Table 2 are complied with; and

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				<p>Where standards are not complied with, an activity status of Restricted Discretionary would be appropriate.</p> <p>Kāinga Ora does not support the density standard of 450m<sup>2</sup>; a more enabling standard should be provided to enable development.</p>	<p>2. The site is serviced by wastewater reticulation, every allotment including the balance allotment, must have a minimum <u>vacant</u> net site area of <del>450</del> <u>300m<sup>2</sup></u> <del>and must not have a maximum net site area greater than 2000 m<sup>2</sup></del>; and</p> <p>3. The site is un-serviced by wastewater reticulation, every allotment including the balance allotment, must have a minimum <u>vacant</u> net site area of 2500 m<sup>2</sup> <del>and must not have a maximum net site area greater than 5000 m<sup>2</sup></del>.</p> <p><u>Restricted</u> Discretionary: where compliance is not achieved</p>
13.	<b>SUB-R1- ALL OTHER ZONES</b>		Oppose in Part	Kāinga Ora considers the activity status of controlled should be applied where standards are complied with.	<p>Amend provision as follows:</p> <p><del>Restricted Discretionary</del><u>Controlled</u>:</p> <p>Where:</p> <p>4. All of the performance standards in SUB - Table 2 are complied with; and</p>



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				Where standards are not complied with, an activity status of Restricted Discretionary would be appropriate.	<p>5. Every allotment including the balance allotment, must have a minimum net site area of 2500 m<sup>2</sup>; and</p> <p>6. There are no maximum net site area requirements.</p> <p><u>Restricted</u> Discretionary: where compliance is not achieved</p>
14.	<b>SUB-R2</b>	Boundary adjustments	Oppose in Part	<p>Kāinga Ora considers the activity status of controlled should be applied where standards are complied with.</p> <p>Where standards are not complied with, an activity status of Restricted Discretionary would be appropriate.</p>	<p>Amend provision as follows:</p> <p><del>Restricted Discretionary</del><u>Controlled</u>:</p> <p>Where:</p> <ol style="list-style-type: none"> <li>1. All of the performance standards in SUB - Table 2 are complied with; and</li> <li>2. The size of the resulting allotments complies with the requirements of SUB-R1; and</li> <li>3. The boundary adjustment must not limit or interfere with any existing allotment's access to a road.</li> </ol>

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					<u>Restricted</u> Discretionary: where compliance is not achieved
15.	<b>SUB-R5</b>	Subdivision to convert (cross lease) leasehold estate to create freehold estate	Oppose in Part	<p>Kāinga Ora considers the activity status of controlled should be applied where standards are complied with.</p> <p>Where standards are not complied with, an activity status of Restricted Discretionary would be appropriate.</p>	<p>Amend the provision as follows:</p> <p><del>Restricted Discretionary</del><u>Controlled</u>:</p> <p>Where:</p> <ol style="list-style-type: none"> <li>1. The subdivision is to create a separate record of title(s) for existing allotment(s); and</li> <li>2. The proposed boundaries must align with those exclusive use area boundaries on the cross-lease plan, except where there are no exclusive use areas; and</li> <li>3. It is required to protect services, easements must be provided; and</li> <li>4. Alterations to buildings or the erection of an accessory building must be either permitted or otherwise lawfully established; and</li> </ol>

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					<p>5. The size of the resulting allotments is not required to comply with the requirements of SUB-R1; and</p> <p>6. The subdivision is not required to comply with the performance standards in SUB - Table 2.</p> <p><u>Restricted</u> Discretionary: where compliance is not achieved</p>
16.	<b>SUB-R6</b>	Subdivision to amend cross leases or unit titles	Oppose in Part	<p>Kāinga Ora considers the activity status of controlled should be applied where standards are complied with.</p> <p>Where standards are not complied with, an activity status of Restricted Discretionary would be appropriate.</p>	<p>Amend the provision as follows:</p> <p><del>Restricted Discretionary</del><u>Controlled</u>:</p> <p>Where:</p> <ol style="list-style-type: none"> <li>1. The subdivision is to amend any cross lease or unit title plan to accommodate alterations to buildings or the erection of an accessory building; and</li> <li>2. Alterations to buildings or the erection of an accessory building must be either permitted or otherwise lawfully established; and</li> </ol>

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					3. There is no material change to the unit site area or to the overall extent and configuration of the individual occupancy; and 4. The size of the resulting allotments is not required to comply with the requirements of SUB-R1; and 5. The subdivision is not required to comply with the performance standards in SUB - Table 2.  <u>Restricted</u> Discretionary: where compliance is not achieved
17.	<b>SUB-R8 – all zones</b>	Subdivision of land to create 7 or more allotments	Oppose	Kāinga Ora does not consider it necessary to have an additional subdivision rule for 7+ allotments; this can be addressed through rule R1.	Delete provision in its entirety.
18.	<b>SUB-R10</b>	Subdivision within the national grid subdivision corridor or in the vicinity of the gas transmission network	Oppose in Part	An activity status of Restricted Discretionary would be more appropriate for this rule and provide more certainty for the resource consent applicant to address matter for discretion.	Amend the provision as follows:  Activity Status- <u>Restricted</u> Discretionary

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19.	<b>SUB-R13, R14, R15</b>	<p>R13- Subdivision of land that will require a road to be vested as legal road</p> <p>R14 – Subdivision of land where the allotment contains, or is located within 20m of the edge of an indicative road</p> <p>R15 – Subdivision of land that results in an increase of allotments being accessed by an existing right of way/private way</p>	Oppose in Part	An activity status of Restricted Discretionary would be more appropriate for these rules.	Amend provision as follows:  Activity Status- <u>Restricted</u> Discretionary
20.	<b>SUB-R16</b>	Subdivision of an allotment subject to a consent notice, bond, or other legal instrument registered on a record of title in favour of Waitomo District Council which restricts further subdivision under this plan or a previous Waitomo District Plan	Oppose	Kāinga Ora does not consider that this type of subdivision should be considered any differently to a normal fee simple subdivision and therefore seeks that it is entirety.	Delete provision in its entirety.  <del>Subdivision of an allotment subject to a consent notice, bond, or other legal instrument registered on a record of title in favour of Waitomo District Council which restricts further</del>

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					<del>subdivision under this plan or a previous Waitomo District Plan</del>
21.	<b>SUB-R18</b>	All subdivision and boundary adjustments must comply with the requirements in SUB - Table 3; and 2. New allotments created by subdivision or boundary adjustments must be able to incorporate the allotment shape factor in a position which does not encroach on any building setback or easement requirements. A building platform may be located over the same area as the allotment shape factor	Oppose	<p>Kāinga Ora does not support the inclusion of allotment shapes where subdivision and land use are to be undertaken in conjunction with one another.</p> <p>In order to ensure vacant allotments are able to contain a permitted dwelling, the criteria should require an indicative, permitted dwelling as part of the subdivision application.</p> <p>The dimensions provided in Table 3 are overly restrictive and will not be enabling of development.</p>	<p>Delete provision in its entirety.</p> <p><del>All subdivision and boundary adjustments must comply with the requirements in SUB – Table 3; and</del> <del>2. New allotments created by subdivision or boundary adjustments must be able to incorporate the allotment shape factor in a position which does not encroach on any building setback or easement requirements. A building platform may be located over the same area as the allotment shape factor</del></p>

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<b>Chapter 41 – Residential Zone</b>					
22.	<b>RESZ-R28</b>		Oppose	<p>Kāinga Ora opposes the use of density controls in areas of public sewerage reticulation, and considers that other bulk and location controls more appropriately manage adverse effects on neighbours and the environment.</p> <p>Notwithstanding the above, Kāinga Ora considers that density controls may be appropriate in areas where residential units are likely to be reliant upon septic systems for sewage disposal (addressed by Rule R29).</p> <p>Kāinga Ora does not support the limit of 7 units, with specific regard to co-housing developments, tiny house developments, papakāinga housing developments and compact housing developments (4-7).</p>	<p>Delete provision in its entirety.</p> <p><del>The maximum number of buildings per site is:</del></p> <p><del>1. One residential unit per 450 m<sup>2</sup> of net site area, except sites less than 450 m<sup>2</sup> existing on 20 October 2022 may erect one residential unit on the site; and</del></p> <p><del>2. Either one minor residential unit with a maximum gross floor area of 70 m<sup>2</sup> excluding garaging or one tiny house per site;</del></p> <p><del>OR</del></p> <p><del>3. One set of duplex dwellings per 800 m<sup>2</sup> of net site area; or</del></p> <p><del>4. A co-housing development comprising of no more than 6 household units where 400 m<sup>2</sup> of net site area is provided per residential unit; or</del></p>

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					<del>5. A tiny house or tiny house development comprising of no more than 6 tiny houses where 200 m<sup>2</sup> of net site area is provided per tiny house; or 6. A papakāinga unit or papakāinga development comprising of no more than 6 papakāinga units where 200 m<sup>2</sup> of net site area is provided per unit; and 7. A compact housing development comprising of no more than 6 residential units where 300 m<sup>2</sup> of net site area is provided per unit.</del>
23.	<b>RESZ-R29</b>		Oppose in part	Kāinga Ora understands the need for development to have sufficient ability to be served by sewage treatment systems. Kāinga Ora however considers that this issue should be addressed directly rather than prescribing density controls to artificially manage the issue.	Amend provision as follows:  <del>1. One residential unit per 2500 m<sup>2</sup> of net site area; and</del> <del>2. Either one tiny house or one minor residential unit</del>  <u>OR</u>



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				<p>Reference to tiny house should be removed, with the concept bundled with 'minor residential unit'.</p> <p>The threshold of 6 units for Co-housing and tiny houses is opposed.</p>	<p><del>3. One set of duplex dwellings per 2500 m<sup>2</sup> of net site area; or</del>  <u>4. Co-housing Residential units, developments, papakāinga and tiny house residential</u> developments <del>of no more than 6 residential units/tiny houses respectively,</del> must be able to <del>on a site of sufficient size to</del> contain the treatment and disposal of wastewater and stormwater resulting from any development within the site boundaries.</p>
<b>All Zones</b>					
25.	<b>GRUZ-R44</b> <b>RLZ-R21</b>	Maximum number of residential units	Oppose in Part	Kāinga Ora supports the principle for allowing a greater density of papakāinga housing units on a site within the General Rural zone; however, the limitation of 6 units per site is not supported.	<p>Amend provision as follows:</p> <p>Maximum number of residential units ...</p> <p>4. A papakāinga housing <del>development of no more than 6 residential units</del> must be on a site of sufficient size to contain the treatment and disposal of wastewater and stormwater resulting from any development within the site boundaries.</p>

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<b>Maori Purpose Zone</b>					
26.	<b>MPZ-1</b>	Marae complex and up to 10 papakāinga units per each individual zone	Oppose in Part	Kāinga Ora does not support the proposed density and further suggest that there should be consistency across the zones with regard to papakāinga housing. It is emphasised that Kāinga Ora do not support a density control for papakāinga housing and consider other bulk and location controls and infrastructure to be appropriate means of regulating density.	<p>Amend provision as follows: Amendments sought.</p> <p>Marae complex and <del>up to 10</del> papakāinga units <del>per each individual zone</del></p> <p>Permitted where:</p> <p>All of the performance standards in MPZ –Table 2 are complied with.</p> <p>Restricted Discretionary where compliance is not achieved with MPZ-R21-<del>MPZR24</del> <u>MPZ-R26</u>.</p> <p><del>Discretionary where compliance is not achieved with MPZ-R25 to MPZ-R26</del></p>