



## SUMMARY OF SUBMISSIONS

BY PERSONS MAKING SUBMISSIONS ON

# PLAN CHANGE 2: PUKEHANGI HEIGHTS to the ROTORUA DISTRICT PLAN

**SUMMARY BY SUBMITTER  
MARCH 2020**

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# SUMMARY BY SUBMITTER NAME INDEX

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SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name                   | Topic                                       | Support / Oppose       | Provision                       | Reasons   | Decision Sought  |
|-------------|----------------------------------|---|------------------------|---------------------------------|---|--|
| 1.0         | Monique Reesby                   | Landscape and Ecological Values             | Oppose                 | Impact of rezoning              | The pukehangi road Rotorua rezoning of hunts farms into pukehangi road heights. Will increase noise, increase traffic, destroy my rural views, de value my property. The only reason I brought my property is for the views. Therefore my property will lose its rural views and be built up by houses. My point of difference from my house and others is the view. What compensation will I get for the noise of building, the increased road noise, and the destruction of my rural views? Please build in the area off home dale street that has started opening the land up. There is no need to warrant building in this area of Rotorua. We have available sections off Homedale street Rotorua    | Do not let this subdivision go ahead. I have lived here at 364 Pukehangi for over twenty years and you are devastating my views, quiet enjoyment of my property due to building construction noise, increased traffic etc. do not develop here!  |
| 1.1         | Monique Reesby                   | Appropriateness of Zones and Structure Plan | Oppose                 | Re-zoning                       | Do not change zoning to urban/residential   | Do not develop Pukehangi heights   |
| 2.0         | Karyn and Justin Rogers          | Culture, Archaeology and Heritage           | Support                | Plan Change                     | In full support as long as cultural and environmental concerns are fully addressed  | Approve subdivision  |
| 2.1         | Karyn and Justin Rogers          | Culture, Archaeology and Heritage           | Support                | Cultural provisions             | Respect cultural requirements   | Approve  |
| 3.0         | David Eric & Rosemary Brackfield | Transportation and the Road Network         | Support with amendment | Roading networks                |   | As a submitter and a household that is affected by the proposed change we would like the Council to take into account the following Points of view:<br>That there is a change to the speed restrictions on Pukehangi road from 70 Km to 50Km.<br>That a slip lane is provided for vehicles to go around cars waiting to cross traffic into Hodgkins Street, (this should also apply to Barraud Place, and Bloomfield Street.<br>A roundabout for Sunset Road would be helpful as there are two corners blocking unrestricted view when pulling out into Pukehangi Road.                                    |
| 3.1         | David Eric & Rosemary Brackfield | Construction Effects                        | Support with amendment | Construction traffic            |   | As a submitter and a household that is affected by the proposed change we would like the Council to take into account the following Points of view:<br>Some control is put in place to keep the Trucks from operating during the busy hours, (Morning and Night).  |
| 3.2         | David Eric & Rosemary Brackfield | Construction Effects                        | Support with amendment | Dust                            |   | As a submitter and a household that is affected by the proposed change we would like the Council to take into account the following Points of view:<br>During Summer that Dust control by watering is used.  |
| 4.0         | Pukehangi Parklands Estate Inc.  | Transportation and the Road Network         | Support with amendment | Roading networks                | Firstly, we support the proposal to install a roundabout at Malfroy/Pukehangi, and a reduction to 50kmh speed limit. We suggest that a similar roundabout at Sunset Rd/Pukehangi would also be sensible given that will become a more heavily used intersection. We do not think the traffic study has considered the downstream rush-hour traffic effect on Sunset Road at the traffic lights linking to Old Taupo Road. This is already a bottleneck in morning rush-hour. This may be corrected by extending the no parking zone outside the industrial area. Currently the road is wide enough for two lanes of waiting traffic at the lights, but gets backed up because of parked cars on the left. | We therefore request the traffic flow planning studies that indicate the impact of the increased traffic along Pukehangi road and Sunset Road, along with the safety assessment for people entering and exiting our gates.   |
| 4.1         | Pukehangi Parklands Estate Inc.  | Reverse Sensitivity Effects                 | Support with amendment | Setbacks                        | Parklands is a gated community, with Rural B1 households. Currently the plan is for residential lots right up to our border, with a walking track beside this, and a marked "overland flow path".   | For security reasons, as well as our enjoyment of rural spaces, we request a "planting buffer zone" of 15-20 meters running up the boundary line between any residential lot and the edge of Parklands. This is consistent with councils and central government requiring farmers and rural owners now. This buffer would be in keeping with the native plantings that already are a feature of the area.<br>We also request that appropriate security fencing be installed running up the boundary line of Parklands. Currently this is inadequate livestock fencing.                                     |
| 4.2         | Pukehangi Parklands Estate Inc.  | Appropriateness of Zones and Structure Plan | Support with amendment | Additional primary road network | We request further clarification of why the primary road marked on the map is then a dotted line as an "additional primary road connection". Are they in fact the same thing, being a proposed road? We also ask you to clarify if this road connection adjoins the overland flow path, or whether there are residential lots built between the road and the overland flow path?  | To be clear, we suggest a good sized buffer zone between our Estate and any housing is preferable.   |
| 4.3         | Pukehangi Parklands Estate Inc.  | Residential Design, Layout and Appearance   | Support with amendment | General                         | It is difficult to determine the density and proposed lot placements, setbacks and so forth from this current plan.   | Before the next stage of approval, Council should provide "to scale" plans with the density and proposed lot structures overlaid on the visuals. We request this in order that we can make an informed and appropriate response.<br>Building height limits should be reasonable and covenanted on titles to avoid blocking views. Again we would benefit from a greater level of detail than currently provided to actually determine what is permissible and intended under this plan, where, how close to the boundary etc. to be able to form meaningful views  |
| 4.4         | Pukehangi Parklands Estate Inc.  | Appropriateness of Zones and Structure Plan | Support with amendment | Future Walkway                  | RLC want to create a public walking track around the Caldera rim and as part of the proposed development of land either side of Parklands, a public walking track is shown marked on the proposed development plan. It then shows a future proposed joining of this public walking track through lots 36 (our property) and 37. Clearly this would represent some serious security and privacy concerns, not only for the owners of lots 36 and 37 but also the other residents of Parklands.   | The committee and residents of Parklands have no intention of ever granting access our private lands for a proposed "walk the caldera", so this needs to be clear from the outset.   |
| 4.5         | Pukehangi Parklands Estate Inc.  | Three Waters                                | Support with amendment | Water                           | Early in discussions Parklands raised that we are having difficulty with current water supply, and would like to connect to town supply. The current proposal notes that this is not a matter that affects rezoning.  | With that noted, we request meetings with RLC engineers to progress this matter, and want to keep it at the forefront of any redevelopment considerations. If there are 700 homes, this could put a peak demand of more than 1,000m3 a day on the RLC system. Our subdivision should be supplied water as our peak demand in summer is under 10% of this. If water is to come from the Matipo Heights Reservoir, RLC should be expected to supply Parklands as well, as the Parklands private water scheme was always intended as an interim measure, until sufficient capacity was available through RLC. |
| 5.0         | John & Kay McDonald Trust        | Natural Hazards                             | Support with amendment | Storm water                     | Our concern is the Pukehangi Heights subdivision would increase storm water problems for Riri Street. The Mangakakahi Stream and the Mangakakahi Drain, are currently inadequate for the storm water now, during torrential rain. Flooding in Riri Street (where our business is) is becoming more frequent.  | We would like the Mangakakahi stream and Mangakakahi drain to be dug out and widened to improve water flow. Culvert under Old Taupo Road needs increasing in size. Maintenance to these water ways is long over due!   |
| 6.0         | Lara Herbert                     | Transportation and the Road Network         | Support                | Additional primary road network | As I live opposite the Current Hunt Farm Driveway, having a new road would substantially increase the traffic flow that we currently have now. Currently there is minimal traffic per day/night from the few houses that are there but if the driveway was to be turned into a road then the traffic noise and at night the headlights shining into bedrooms would make a huge difference to us. Therefore the option 6 a or b or option 7 with the main roads being at the Pegasus Drive intersection and Malfroy Road roundabout would be our preferred options   | No road where the current Hunt farm driveway is.   |
| 6.1         | Lara Herbert                     | Construction Effects                        | Support with amendment | Dust, noise and vibration       | We have concerns about the Dust/ Noise / Vibration while the earthworks are taking place and also the water runoff. At the moment we get a lot of run off from the farm, currently we have to dig out our soak pit/hole at the bottom of our driveway at least once a year because of the silt, dust, water run off from hunt farm but with earthworks and construction this will only increase   | Plan dust / noise and water run off  |
| 7.0         | Rotorua Stock car Club Inc.      | Reverse Sensitivity Effects                 | Support with amendment | Noise                           | That the rezoning takes into consideration that the Rotorua Stock car Club Inc. has Existing Use Rights which was initially granted in 1970 to race Stock cars on their property at 105 Paradise Valley Road. This racing may result in an increased noise level in the area to be rezoned and that needs to be considered in any future plans for this area.   | That any title issued includes a proviso that we have Existing Use Rights.   |
| 8.0         | Ngawhainga Kiriona-Winiata       | General                                     | Oppose                 | Affordable housing              | Takahi te karanga me te wairua o tangata whenua: Tangata whenua have been asking Rotorua Lakes Council, and its predecessors, for generations to make changes to their district plan to remove obstacles so they can build much needed and affordable housing for them, many of whom are homeless, on their ancestral lands. The council has not given meaningful ear to our call and has instead prioritised their energies and resources toward wealthy corporate developers opening up land for those with deep pockets, most of whom are not tangata whenua.  |  |
| 8.1         | Ngawhainga Kiriona-Winiata       | General                                     | Oppose                 | Tangata Whenua Housing          | Takahi te Tiriti o Waitangi: Any move by council and Crown (including the Minister for the Environment) to continue advancing this plan change, before making the district plan changes needed for tangata whenua housing, in my opinion is a breach of article three of the Treaty which aims to ensure that tangata whenua are not treated like second class citizens in their own land. Furthermore, while this development will increase housing supply in Rotorua, it will not reduce the gap between Māori and non-Māori home ownership. In fact, it will likely widen that gap.  |  |
| 8.2         | Ngawhainga Kiriona-Winiata       | Culture, Archaeology and Heritage           | Oppose                 | Cultural impact assessment      | Takahi te mana o te iwi: The serious concerns of Ngāti Kearoa Ngāti Tuarā, outlined in their cultural impact assessment report, have not been addressed. I agree with the iwi that if this development proceeds as is then it will be to the detriment of waahi tapu, waahi tupuna and their cultural values.   | Address concerns of Ngāti Kearoa Ngāti Tuara as outlined in their cultural impact assessment report.   |
| 8.3         | Ngawhainga Kiriona-Winiata       | Three Waters                                | Oppose                 | Karamu Takina Spring            | Takahi te mauri o te puna: More pressure will be placed on Karamu Takina Springs, which already supplies water to 60% of the city, and possibly also Mawai Springs, which is near Takina, due to more than 700 households now needing water supply; yet research on both these springs is lacking and tangata whenua still have outstanding matters yet to be addressed by the Crown over freshwater ownership and management.  | Address matters over freshwater ownership and management.  |
| 8.4         | Ngawhainga Kiriona-Winiata       | Three Waters                                | Oppose                 | Water Quality                   | Takahi te mauri o te awa: The subdivision will increase the amount of contaminated storm water flowing into the already polluted Utuhina stream; and the mitigation measures to address this are based on assumptions due to the lack of catchment research and modelling.  |  |
| 8.5         | Ngawhainga Kiriona-Winiata       | Three Waters                                | Oppose                 | Water Quality/Lake Rotorua      | Takahi te mauri o te roto moana: Te Utuhina flows into Te Rotorua nui a Kahumatamomoe (Lake Rotorua) which is already under threat from current storm water runoff and another proposal by council to discharge 20 million litres of treated sewage every day for the next 30 years.  |  |
| 8.6         | Ngawhainga Kiriona-Winiata       | General                                     | Oppose                 | Streamlined Plan Change Process | Takahi te tika: The streamlined process takes mana away from tangata whenua and residents and places it in the hands of a Minister in Wellington because tangata whenua and residents will not have the option, as usually the case, to appeal this proposal in the Environment Court.  |  |

SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

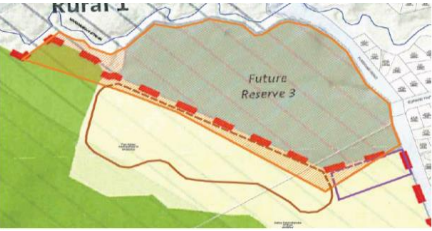
| Submitter # | Submitter Name                      | Topic                                   | Support / Oppose       | Provision  | Reasons   | Decision Sought  |
|-------------|-------------------------------------|---|------------------------|--|---|--|
| 9.0         | Heritage New Zealand Pouhere Taonga | Culture, Archaeology and Heritage       | Support with amendment | Policy 2.9   | The intensification of land use increases the potential to cause adverse effects to Historic Heritage, in particular archaeology and cultural sites. HNZPT is supportive of the proposed rezoning subject to the appropriate ongoing management of historic heritage, in particular archaeology and cultural sites. There is no mention of archaeological sites within the proposed objectives or policies (there is some consideration within existing Objectives-see Objective 13.3.11), yet there are rules and performance standards related to archaeological sites. The plan change should be amended to create a cascade of consideration throughout the provisions to ensure a robust consideration for minimising any adverse effects on archaeological sites within the Plan Change 2 area. In addition there are performance standards that relate to the management and protection of archaeological sites. These processes should be discussed and developed in consultation with HNZPT to ensure that any proposed works do not trigger the need for an archaeological authority. See submission for full discussion.   | HNZPT seeks that the objective, policy, rule and performance standard frameworks is amended to ensure the inclusion of the consideration of protection of archaeological sites as part of the objectives and policies to support the inclusion of archaeological sites within the rules and performance standards.   |
| 9.1         | Heritage New Zealand Pouhere Taonga | Culture, Archaeology and Heritage       | Support with amendment | PS A5.2.4.4.6  | There are performance standards that relate to the management and protection of archaeological sites. These processes should be discussed and developed in consultation with HNZPT to ensure that any proposed works do not trigger the need for an archaeological authority. See submission for full discussion.   | The performance standards at A5.2.4.4.6 Protection of Cultural Identity and Sites of Archaeological or Cultural importance and any similar provisions are amended to include consultation with HNZPT.  |
| 9.2         | Heritage New Zealand Pouhere Taonga | Culture, Archaeology and Heritage       | Support with amendment | Archaeological sites   | With regard to which archaeological and cultural sites are to be considered, it is unclear within the proposed provisions if this consideration is constrained to those sites already scheduled, those identified in the Archaeological Report and Cultural Impact Report (see footnote 1 and 2) or if there is scope for newly identified sites to be protected within a development process? There is further uncertainty created by the varying language that is used to reference sites that are to be assessed through the rules and performance standards, for example in the Residential 1 Rules (pg. 9) subdivision is a restricted discretionary activity, "where the site includes a site of archaeological or cultural importance". Alternatively the associated performance standards refer to "any archaeological site" which seems to not relate directly to the rule which talks of "sites of importance". In the Rural 2 zone, the consideration of archaeology and cultural sites appears to be limited to those sites identified on the structure plan. A consistent and unambiguous approach would be beneficial and ensure protection of these sites.   | Plan Change 2 is amended to provide clarity regarding the archaeological and cultural sites that are intended for protection under the proposed provisions.  |
| 9.3         | Heritage New Zealand Pouhere Taonga | Culture, Archaeology and Heritage       | Support with amendment | New: Advice Note   | HNZPT also considers that there would be merit in the inclusion of an advice note within the Appendix 5 "Development Plans, Development Areas, and Structure Plans" that advises of the need for a HNZPT archaeological authority for the modification or damage of an archaeological site, either recorded or unrecorded. At the time of writing there have been no applications for an archaeological authority for the destruction or modification of the sites within the Plan Change 2-Pukehangi Heights area.   | An advice note within the new plan change provisions (being the addition of the provisions to Appendix 5 as opposed to the subsequent changes within other parts of the operative District Plan) that an HNZPT archaeological authority is required should an archaeological site, recorded or unrecorded, be damaged or destroyed. It is not appropriate to rely on an accidental discovery protocol as a condition of resource or subdivision consent. Heritage New Zealand advocates for preservation of archaeological sites in the first instance. An archaeological authority can be declined. Heritage New Zealand prefers that this process takes place well prior to the development of building proposals and plans. |
| 10.0        | Te Arawa Lakes Trust                | Culture, Archaeology and Heritage       |                        | Introduction<br>Policy 2.9   | Te Arawa Lakes Trust supports the evaluation and recommendations contained in the Cultural Impact Assessment prepared by Te Rūnanga o Ngāti Kearoa Ngāti Tuarā. The Trust is pleased to see that Rotorua Lakes Council (the Council) has responded to some of the recommendations made by Ngāti Kearoa Ngāti Tuarā by adding an expanded Tangata Whenua consultation and engagement policy (policy 2.9). However, as identified in the submissions of Ngāti Kearoa Ngāti Tuarā and Ngāti Whakaue, the Pukehāngi Structure Plan and development of the area may have cultural impacts on other iwi and hapū who have associations to the area. It will have impacts on the wider cultural landscape including the Utuhina catchment and downstream sites to which other iwi and hapū associate. In its report to the Minister for the Environment for the streamlined planning process Council identifies three Te Arawa iwi and hapū who may be affected by the Plan Change. The Plan Change does not reflect this and refers solely to the Cultural Impact Assessment prepared by Te Rūnanga o Ngāti Kearoa Ngāti Tuarā in the introduction and in policy 2.9. The Trust seeks that the Plan change retain these references and key links to the Cultural Impact Assessment prepared by Te Rūnanga o Ngāti Kearoa Ngāti Tuarā and expand the introduction and policy to recognise the potential for cultural impacts on other iwi and hapū and the wider cultural landscape including downstream sites and values.   | Retain recognition of the Cultural Impact Assessment prepared by Te Rūnanga o Ngāti Kearoa Ngāti Tuarā and add to the introduction and policy 2.9 a recognition of the potential for cultural impacts on other iwi and hapū and the wider cultural landscape including downstream sites and values.  |
| 10.1        | Te Arawa Lakes Trust                | Culture, Archaeology and Heritage       |                        | Performance Standards for Subdivision A5.2.3.4.10 and A5.2.4.4.6<br>Performance Standards for Land Use A5.2.3.3 and A5.2.4.3<br>Structure Plan Key | Te Arawa Lakes Trust supports the subdivision performance standards for the protection of cultural and archaeological sites identified in the structure plan (Standards A5.2.3.4.10 and A5.2.4.4.6). The Trust seeks that these measures be retained and expanded to include reference to potential cultural impacts on other iwi and hapū. The Trust also seeks that similar performance standards be applied to land use applications. While it is envisaged by Council that subdivision will be the next stage in development of the area, land use consent applications may be received before subdivision. It is vital that the preference standards for the protection of identified cultural and archaeological sites be considered at that time. The Trust notes that while the plan change policies refer to cultural and archaeological sites the key for the structure plan refers only to archaeological sites. The Trust seeks that this key be amended to refer to cultural and archaeological sites.   | Retain and expand performance standards to include reference to potential cultural impacts on other iwi and hapū and introduce similar performance standards to be applied to land use applications. Label identified sites on structure plan as both Cultural and Archaeological sites.   |
| 10.2        | Te Arawa Lakes Trust                | Culture, Archaeology and Heritage       |                        | Policy 2.9   | Te Arawa Lakes Trust, as noted above, supports the inclusion of policy 2.9 in response to the Cultural Impact Assessment prepared by Te Rūnanga o Ngāti Kearoa Ngāti Tuarā. The Trust seeks that policy 2.9 be retained and strengthened to include: <ul style="list-style-type: none"><li>• Reference to potential cultural impacts on other iwi and hapū with associations to the area and the wider cultural landscape including downstream sites.</li><li>• A process for altering subdivision and development plans to accommodate the discovery of culturally significant sites within the area. This could be achieved by amending the last bullet point of policy 2.9 to refer to mitigating, remedying or avoiding adverse effects on discovered, as well as already identified, cultural sites and areas.</li></ul> In addition it is unclear how the consultation and engagement provisions of Policy 2.9 work with the broad non-notification provisions stated in A5.2.3.2, A5.2.4.2 and A5.2.5.2. This simply requires an application to be consistent with the principles of the Pukehāngi Structure Plan for it to be processed without notification or the need to obtain affected party approvals. The relevant principle is: "Development that recognises, protects and provides for the expression of the cultural and archaeological values of the area;" This sets a far lower standard for the involvement of tangata whenua than the detailed consultation and engagement provisions of policy 2.9. Iwi and hapū may engage with applicants through that policy only to have their concerns or solutions discarded by a developer who then seeks a non-notified application by arguing that this principle has been met. The adverse impacts of the loss of affected party status for Tangata Whenua is aggravated by the use of a streamlined planning process, from which there is no right of appeal, to introduce these provisions. Only tangata whenua can determine if a development provides appropriate recognition and protection for cultural values and the expression of those values. The Trust seeks that: <ul style="list-style-type: none"><li>• The relevant structure plan principle be reworded to ensure that it is Tangata Whenua who determine if the recognition and perception of cultural values is appropriate and the expression of those values provided for; and</li><li>• The non-notification provisions be revised to provide for Tangata Whenua as affected parties.</li></ul> | Retain and amend to include reference to potential cultural impacts on other iwi and hapū, their associations to the area and the wider cultural landscape including downstream sites. Add to the policy a process for altering subdivision and development plans to accommodate the discovery of culturally significant sites within the area. This could be achieved by amending the last bullet point of policy 2.9 to refer to mitigating, remedying or avoiding adverse effects on discovered, as well as already identified, cultural sites and areas.   |
| 10.3        | Te Arawa Lakes Trust                | Residential and Rural Residential Zones |                        | Non-notification provisions  | The Pukehangi Structure Plan represents a significant change of land use within the Lake Rotorua catchment and provides for approximately 800 additional dwellings. Consequently the plan change affects nutrient flows within the catchment and impacts upon lake water quality. The Trust understands that Council has not completed modelling of the effect of the proposed land use change on lake water quality. The Trust is disappointed that Council, as a partner in the Rotorua Te Arawa Lakes Strategy Group, has not confirmed that the proposed land use change will reduce nutrient flows within the catchment before proceeding with the plan change. Furthermore the Trust is disappointed that Council has not raised this plan change with its strategy group partners as part of the co-ordination of policy and actions between partners. The view of the Trust is that Lake Rotorua water quality should be of primary concern in considering this plan change. The Trust considers that the plan change should not proceed without robust modelling which demonstrates that nutrient flows within the catchment will be reduced.  | Reword the structure plan principles to ensure it is Tangata Whenua who determine if the recognition and perception of cultural values is appropriate and the expression of those values provided for; and revise the non-notification provisions to provide for Tangata Whenua as affected parties.   |
| 10.4        | Te Arawa Lakes Trust                | Three Waters                            |                        | Objective 2<br>Policy 2.3<br>Objective 3<br>Policy 3.1   | Development within the structure plan area has the potential to significantly alter the quality and quantity of storm water and stream flows within the Utuhina catchment including the Otamatea and Mangakakahi streams. Culturally significant sites located downstream of the structure plan area, including Tārewa Pounamu and Ohinemutu, already suffer from poor water quality and flooding. Any further increase in flooding or decrease in water quality should be avoided. The Trust supports the concept of low impact storm water design as set out in policy 2.3 and elsewhere in the structure plan and seeks that these provisions be retained. The Trust is concerned that policy 2.3 sits under an objective which does not protect environmental quality outside the structure plan area and seeks that objective 2 be expanded to apply to the wider area in general and downstream sites in particular. The Trust considers that there should be no increase in downstream flood risk and therefore supports objective 3 as essential to the structure plan. The Trust appreciates the significant amount of storm water investigation and modelling undertaken to date. However the Trust understands that modelling of the catchment is not complete and uncertainty remains regarding flooding impacts in the lower Utuhina. Furthermore the Trust is concerned that the policies to achieve objective 3 are insufficiently strong given the uncertainty that will remain until modelling and design are complete. Consequently, the Trust seeks that a strong policy direction be added stating that applications which do not demonstrate that they will avoid any increase in downstream flood risk will be refused consent.   | Retain objective 2 and expand to include surrounding areas and downstream water quality improvements. Retain Policy 2.3 and low impact design principles throughout the Structure Plan. Retain Objective 3 and policy 3.1. Add a policy stating that applications which do not demonstrate that they will avoid an increase in downstream flood risk will be refused consent.  |



SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name   | Topic                                       | Support / Oppose           | Provision  | Reasons   | Decision Sought  |
|-------------|--|---|----------------------------|--|---|--|
| 10.5        | Te Arawa Lakes Trust                                       | Three Waters                                |                            | Nutrient Flows   | The Pukehāngi Structure Plan represents a significant change of land use within the Lake Rotorua catchment and provides for approximately 800 addition dwellings. Consequently the plan change affects nutrient flows within the catchment and impacts upon lake water quality. The Trust understands that Council has not completed modelling of the effect of the proposed land use change on lake water quality. The Trust is disappointed that Council, as a partner in the Rotorua Te Arawa Lakes Strategy Group, has not confirmed that the proposed land use change will reduce nutrient flows within the catchment before proceeding with the plan change. Furthermore the Trust is disappointed that Council has not raised this plan change with its strategy group partners as part of the co-ordination of policy and actions between partners.<br>The view of the Trust is that Lake Rotorua water quality should be of primary concern in considering this plan change. The Trust considers that the plan change should not proceed without robust modelling which demonstrates that nutrient flows within the catchment will be reduced.   | The plan change should not proceed without robust modelling which demonstrates that nutrient flows within the Rotorua Lake catchment will be reduced.  |
| 11.0        | Waka Kotahi NZ Transport Agency                            | Transportation and the Road Network         | Support                    | Modelling  | Additional Information Requirements<br>While the Transport Agency is supportive of the proposed plan change in principle, traffic generated by future development in the Pukehangī Heights structure plan area could affect the safety and efficiency of a number of State Highway 5 (SH5) intersections (Malfroy Rd/SH5, Sunset/SH5, Devon St/SH5 and Springfield Rd/SH5. This has not been adequately addressed in the supporting traffic report, and additional information is required to ascertain what effects the proposal will have on the state highway network.<br>Depending on the nature and extent of the effects identified through this additional assessment, mitigation measures may need to be incorporated into the plan change provisions through rules and/or assessment criteria with supporting objectives and policies.   | See other submission points for specific requests.   |
| 11.1        | Waka Kotahi NZ Transport Agency                            | Transportation and the Road Network         | Support                    | Modelling  | Trip Generation and Distribution<br>The Traffic Report details specific changes in flow on some roads based on the TRACKS model for Rotorua. However, with the exception of Figure 2, which shows the evening traffic distribution, the Traffic Report does not provide details as to the trip generation rates used or the distribution in the morning peak or interpeak periods.  | The Transport Agency requests details of the trip generation rate, the mode share assumed and the modelled distribution for the AM peak, interpeak (IP) and PM peak periods.   |
| 11.2        | Waka Kotahi NZ Transport Agency                            | Transportation and the Road Network         | Support                    | Residential Yield  | Residential Yield<br>The Traffic Report adopts a future residential yield of 708 lots in the Pukehangī Heights structure plan area.   | The Transport Agency requests details of how this figure was calculated.   |
| 11.3        | Waka Kotahi NZ Transport Agency                            | Transportation and the Road Network         | Support                    | SH5 Intersections - Effects Assessment   | SH5 Intersection - Effects Assessment<br>Traffic generated by future development in the Pukehangī Heights structure plan area could affect the safety and efficiency of the following SH5 intersections: Malfroy Road, Sunset Road, Devon Street, Springfield Road.   | The Transport Agency requests evidence of the assessment of effects on these intersections and details of any mitigations required. SIDRA analysis of these intersections may be required, depending on the outcome of the trip distribution and generation assessment requested above. If the development will cause or exacerbate adverse safety of efficiency effects on the state highway network, the Transport Agency would like to engage further with Council to agree mitigation measures to be incorporated into the District Plan provisions. The Traffic Report identifies that the Malfroy Road intersection will need additional capacity for the through movement on the east approach. Improvements to this intersection are listed in the Rotorua Long Term Plan, with a note that there is to be co-investment with the Transport Agency. It is our understanding that this item is not in the Regional Land Transport Programme. If these intersection improvements are to form mitigation for the proposed plan change, the Transport Agency requests design details of the proposed upgrade, confirmation of what funding is secured, and when implementation is planned. |
| 11.4        | Waka Kotahi NZ Transport Agency                            | Transportation and the Road Network         | Support                    | Public Transport   | Public Transport<br>Although not discussed in the Traffic Report, there is some commentary in the Section 32 Report that suggests additional bus stops could be provided to cater for future development in the Pukehangī Heights structure plan area.  | Given the scale of development anticipated, the Transport Agency considers it necessary to understand how current and potential future routes may be influenced. This may result in changes to the way in which buses are routed along and across SH5. The Transport Agency requests additional information in relation to the current public transport routes serving Westbrook, and the potential for route changes to serve the structure plan area. Further engagement with BOPRC may be required in this regard.  |
| 11.5        | Waka Kotahi NZ Transport Agency                            | Construction Effects                        | Support                    | Construction Traffic   | The Traffic Report discusses several options and issues related to construction traffic routes. However, there is no information regarding the number of movements expected per day. The Traffic Report discusses several options and issues related to construction traffic routes.  | The Transport Agency requests details regarding the expected average and hourly maximum construction vehicle flows, and the routes that are to be promoted and prohibited.   |
| 12.0        | Matipo Ave Residents Inc. Society c/- Ronn Finn (Chairman) | Residential and Rural Residential Zones     | Support                    | A5.2A<br>Pukehangī Heights Development Area / A5.2A.1 Introduction                         | Overall, MARIS generally supports the proposed plan change of the “Pukehangī Heights” area to enable future residential development as set out in the plan change documentation.<br>In relation to A5.2A and A5.2A.1, MARIS supports the description set out in the introduction to the Pukehangī Heights Development Area including the general and specific principles relating to the Caldera Rim landscape and the wider cultural and historical landscape for Ngāti Kea Ngāti Tuara. MARIS also acknowledge and support the recognition and protection of the Rotorua Caldera Rim landscape recognising its importance as an Outstanding Natural Feature or Landscape (ONFL) and in terms of the areas significance to Ngāti Kea Ngāti Tuara in accordance with the matters of national importance set out in ss6(b) and 6(e) the Resource Management Act 1991 (RMA). Likewise, the functions and obligations set out under ss7(a) and 8 of the RMA.   | Retain as notified.  |
| 12.10       | Matipo Ave Residents Inc. Society c/- Ronn Finn (Chairman) | Appropriateness of Zones and Structure Plan | Support                    | A5.1 / A5.8 / 4.5.5 / 4.6.4 a.iv / 4.8.2.6 / 9.8.2.7 / 13.5.2.1 / 13.2.5.9 / Planning Maps | MARIS support the deletion of consequential references to the Twin Oaks Development Plan (TODP) in the District Plan. This aligns with the intent of PC2 to provide future residential development in the TODP area.  | Retain as notified.  |
| 12.1        | Matipo Ave Residents Inc. Society c/- Ronn Finn (Chairman) | Transportation and the Road Network         | Oppose                     | A5.2.3.4.11<br>Residential 1 Performance Standards Subdivision - Development Traffic       | MARIS oppose this performance standard in its entirety, in particular the proposal to link the Te Arawa Group Holdings (TAGH) land to Matipo Avenue via an “additional primary road connection”. This will in effect link the TAGH land to Matipo Avenue forming a loop road with the Hunt farm land. There is limited explanation in the s32 evaluation report as to the rationale for this additional primary road connection. However, reference is made in the s32 report to Matipo Avenue being narrow and having a steep gradient where it rises from Pukehangī Road, which, it is stated “reduces its capacity for additional traffic to be handled safely”. The additional connection road poses a similar concern in terms of width and gradient and ultimately traffic safety. Additionally, MARIS is also concerned how the connection road will conform with the Crime Prevention Through Environmental Design Principles (CPTED) such as providing for passive surveillance and avoiding “crime corridors”. One of the hallmarks of the National Guidelines for Crime Prevention through Environmental Design in New Zealand is to “Think Criminal”. Recent and multiple studies available in open source research compare crime prevalence statistics between spatially similar cul-de-sacs and two way streets. These studies show that generally, crime of various types is lower in cul-de-sacs than in two way streets. “Thinking Criminal”, outlines how if one looks to inhibit access and egress for criminals and enhance the prevalence of natural human surveillance (passive), criminal behaviour is also naturally inhibited. While proposals providing connections and connectivity in land development provides movement choice and connectivity, it must be balanced with safety and privacy considerations. In the alternative, MARIS propose that a more efficient use of this hillside between the boundary of Matipo Ave properties and the water reservoir / TAGH land is to create a short cul-de-sac and right of way along the rear boundary of the Matipo Ave properties and form 6-7 allotments on this hillside. Thereby, limiting access to 6-7 residential dwellings. Furthermore, angling this road connection up the hillside will preclude development of allotments in this area because of topographical limitations. That is, the amount of land that will be required to form the proposed road will restrict the potential to establish residential allotments. Connectivity with the wider Pukehangī Heights development will still be achieved via the road connection between 6-10 Matipo Avenue and the Hunt farm land. MARIS also note that the link road could exacerbate substandard stopping distances and substandard vertical and horizontal alignments, creating potential cumulative effects for Matipo Avenue residents and also a potential loss of amenity. It is noted that the opposition is not to the number of dwellings proposed on the TAGH land, but to the access by way of the additional connection road. Access through the Hunt farm land is preferred for the above reasons. | Delete the additional primary road connection between Matipo Ave and TAGH land.<br>Or, there are two alternatives to the link road by way of either Great West Road or the Hunt farm land road. However, MARIS are amenable to the temporary use of a link road/private road for house construction within the TAGH land until such time as access is available via either Great West Road or the Hunt farm land road.<br>Or, in the alternative, make similar or consequential amendments to the proposed changes which would appropriately and satisfactorily address the matters raised in this submission point.   |
| 12.2        | Matipo Ave Residents Inc. Society c/- Ronn Finn (Chairman) | Construction Effects                        | Support with clarification | A5.2.3.4.12<br>Residential 1 Performance Standards Subdivision - Construction Traffic      | MARIS support the proposal to restrict construction traffic gaining access from Matipo Avenue as per this performance standard. As stated in the supplementary cover letter to this submission, a consent order was issued by the Environment Court in relation to the TODP and the effects of construction traffic was explored at length. It was ultimately agreed that all construction and service traffic associated with the development of the retirement village would access the development via Great West Road.<br>MARIS continues to recognise this consent order and provides the following in relation to support for performance standard A5.2.3.4.12 and their continued opposition to construction traffic utilising Matipo Avenue:<br>- Traffic safety issues in terms of the steep gradient of Matipo Avenue (i.e. steeper than 1:8 at the top end), with a narrow carriageway, particularly for large vehicle access when vehicles are parked in the carriageway, and an unsafe intersection with Pukehangī Road.<br>- General loss of amenity for residents, in particular the change in residential character (e.g. increased traffic, pedestrian safety, noise and vibration, light spill and visual effects) and the disruption to the expected residential use and enjoyment by residents of their properties. - Recognition that the existing environment of Matipo Avenue is one of a quiet, safe, family oriented street. It is characterised by low to medium density residential living. Heavy construction vehicles are entirely inappropriate in this context.<br>- Heavy construction vehicles damage roading infrastructure. The carriageway formation would likely be damaged to the extent that a full reconstruction and rehabilitation of the pavement would be required. This again would cause disruption and a loss of amenity to Matipo Avenue residents.<br>Clarity is sought from Council in relation to “construction traffic” and what is meant by “but does not include traffic associated with construction of residential buildings and structures in the Development area”. This reads as though it would only restrict heavy vehicles associated with earthworks and infrastructure and not limit trade vehicles and heavy vehicles transporting timber and large housing materials to a site. It is noted that traffic in relation to housing construction only within the TAGH land would be supported by MARIS.   | Retain as notified.<br>Provide clarification as requested and amend performance standard to be more explicit if required.  |

SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name   | Topic                                       | Support / Oppose           | Provision  | Reasons  | Decision Sought  |
|-------------|--|---|----------------------------|--|--|--|
| 12.3        | Matipo Ave Residents Inc. Society c/- Ronn Finn (Chairman) | Construction Effects                        | Support                    | A5.2.3.4.13 Residential 1 Performance Standards Subdivision - Construction Noise and Vibration | The requirement to provide a noise and vibration management plan is supported by MARIS. There is the potential for significant adverse effects on the amenity of neighbouring residents including Matipo Avenue residents. A management plan is an appropriate method to ensure any adverse effects during construction as a result of noise and vibration are both mitigated and managed appropriately.   | Retain as notified.  |
| 12.4        | Matipo Ave Residents Inc. Society c/- Ronn Finn (Chairman) | Transportation and the Road Network         | Oppose                     | A5.2.4.4.7 Rural 2 Performance Standards Subdivision – Development Traffic                     | Please refer to MARIS submission point on A5.2.3.4.11 above.   | Delete the additional primary road connection between Matipo Ave and TAGH land.<br>Or, there are two alternatives to the link road by way of either Great West Road or the Hunt farm land road. However, MARIS are amenable to the temporary use of a link road/private road for house construction within the TAGH land until such time as access is available via either Great West Road or the Hunt farm land road.<br>Or, in the alternative, make similar or consequential amendments to the proposed changes which would appropriately and satisfactorily address the matters raised in this submission point.   |
| 12.5        | Matipo Ave Residents Inc. Society c/- Ronn Finn (Chairman) | Construction Effects                        | Support with clarification | A5.2.4.4.8 Rural 2 Performance Standards Subdivision – Construction Traffic                    | Please refer to MARIS submission point on A5.2.3.4.12 above.   | Retain as notified.<br>Provide clarification as requested and amend performance standard to be more explicit if required.  |
| 12.6        | Matipo Ave Residents Inc. Society c/- Ronn Finn (Chairman) | Construction Effects                        | Support                    | A5.2.4.4.9 Rural 2 Performance Standards Subdivision – Construction Noise and Vibration        | Please refer to MARIS submission on point A5.2.3.4.13 above.   | Retain as notified.  |
| 12.7        | Matipo Ave Residents Inc. Society c/- Ronn Finn (Chairman) | Transportation and the Road Network         | Oppose                     | Proposed Structure Plan  | Please refer to submission point A5.2.3.4.11 above.<br>It is also noted here, that although not specifically addressed in the plan change as notified, MARIS would support separation from the proposed primary connection between the Hunt farm land and 6 Matipo Avenue by way of additional lots or an appropriate sound barrier.   | Delete the additional primary road connection between Matipo Ave and TAGH land.<br>Or, there are two alternatives to the link road by way of either Great West Road or the Hunt farm land road. However, MARIS are amenable to the temporary use of a link road/private road for house construction within the TAGH land until such time as access is available via either Great West Road or the Hunt farm land road.<br>Or, in the alternative, make similar or consequential amendments to the proposed changes which would appropriately and satisfactorily address the matters raised in this submission point.   |
| 12.8        | Matipo Ave Residents Inc. Society c/- Ronn Finn (Chairman) | Transportation and the Road Network         | Support                    | Closing Matipo Ave   | MARIS support closing Matipo Avenue at the intersection with Pukehangi Road. This will enable increased connectivity between 6-10 Matipo Avenue to the proposed link road through to the Hunt farm land.   | Retain as notified.  |
| 12.9        | Matipo Ave Residents Inc. Society c/- Ronn Finn (Chairman) | Transportation and the Road Network         | Support                    | Roundabout   | MARIS support the proposed roundabout at Malfroy Road / Pukehangi Road providing access to Hunt farm land. A roundabout presents a practical option to ensure connectivity with the Hunt farm land and a greater degree of safety for motorists/pedestrians than traffic signals, such as give way or stop signs, alone.   | Retain as notified.  |
| 13.0        | Freedom Villages   | Appropriateness of Zones and Structure Plan | Support with amendment     | Inclusion of additional land into the plan change area   | <p>Requests to have the area of land that is identified as 'Future Reserve 3' rezoned to be a Medium Density Residential Development Area (see image below). We have read over the original intention for our client's piece of land in the report for the plan change, and it was identified that it would be used as a school. The Future Reserve 3 zone was subsequently proposed as part of the plan change by the Council, as it would allow for this activity. However, the Ministry of Education have no recorded interest in this site. Therefore, this zoning is no longer considered to be applicable. We note that part of this area that we are applying to have rezoned would also include an area of land that is zoned as Rural 2. Our client would intend to use this area as a car parking area for their retirement village, and as an overland flow path for their site. They would not be intending to build any units within this area, so we would be open to this area having special restrictions over this land if it was rezoned. For instance, that no retirement village units can be constructed within this area without needing a land use consent.</p>    | Requests to have the area of land that is identified as “Future Reserve 3” to be rezoned to be a Medium Density Residential Development Area, and therefore to have the orange outline above in Diagram 2 stretching around the property.  |
| 13.1        | Freedom Villages   | Appropriateness of Zones and Structure Plan | Support with amendment     | Inclusion of provisions to enable a retirement village   | <p>We have proposed this rule so that the retirement village would generate a similar level of adverse effects as the level that would be generated if it was used for a medium density development. While we have elected to go for a gross site area for the units, instead of net area, this is in acknowledgement of the practical use of the retirement village and the intended purpose of the units and the underlying land. Typically, these sites would be developed with a mix of 1-3 bedroom terraced, duplex, and standalone dwellings, which are designed to have comparatively little in the way of amenity space. The amenity areas for these developments would instead be larger and centrally located, such as communal reserves, bowling greens, or swimming pools that are located within easy walking distance of the units surrounding them. This is in general accordance with the intention of a retirement village, which is to provide a connected community for older generations with little site maintenance needs for their residents.</p> <p>If the net site area rule was applied to our site then it would create an impractical development that is not in accordance with the intention of a retirement village. As an example, a standard two-bedroom cottage with a single garage would be approximately 80 to 100m² in area. This would then require approximately 100m² to 120m² around the unit that the majority of which would be unused space. It would also become a larger area that the residents would need to maintain. Alternatively, if the rules as above are applied, then this unused space around dwellings could be accumulated and used for providing the aforementioned amenity areas. It would therefore give the developer the area to provide a higher level of overall on-site amenity for their tenants. It would also ensure that the site can provide a level of density that is in line with the medium density development rules, while still being adequately serviced with other aspects, such as access ways and footpaths around the site, or storm water ponds. This is important, as retirement villages effectively require full-width roads and wide footpaths to provide accessibility and safety for their tenants. This is as opposed to medium density developments, which would typically propose access ways of a minimum width, and have less of an onus on providing a higher level of pedestrian accessibility.</p> | <p>The client would like the ability to undertake a retirement village in this area as a permitted activity. This would first mean introducing a definition of a retirement village. We would suggest the following or similar:</p> <p>Retirement Village<br/>Part of any property, building, or other premises that contains two or more independent dwelling units or their dwelling unit equivalents that provide residential accommodation in the form of independent living townhouses and/or apartments and/or supported living provided on a bed and/or room basis (for avoidance of doubt this includes rest home and/or dementia care), predominantly for persons in their retirement (including their spouses or partners), together with associated services and facilities.<br/>Associated services and facilities may include, but are not limited to, the following:<br/>a) Healthcare and/or hospital facilities providing medical support exclusively to village residents;<br/>b) Retail and service facilities for the exclusive use of village residents;<br/>c) Administrative offices for the day to day operation of the village;<br/>The following are not retirement villages for the purposes of this definition:<br/>a) Owner-occupied residential units registered under the Unit Titles Act 2010 or owner-occupied cross lease residential units that in either case do not provide services or facilities to their occupants beyond those commonly provided by;<br/>i) similar residential units that are not intended to provide accommodation predominantly for retired people and their spouses or partners; or<br/>ii) residential units occupied under tenancies to which the Residential Tenancies Act 1986 applies;<br/>b) Boarding houses, guest houses, or hostels;<br/>c) Halls of residence associated with educational institutions; and<br/>d) Shared accommodation.<br/>Also, in order to undertake this activity in this area, it would also mean the introduction of the following rule, or something similar, under A5.2.3.3:<br/>11. Retirement Villages<br/>Location: Within the areas as indicated on the Pukehangi Heights Development Area Structure Plan as Medium Density Development Area, retirement villages may occur.<br/>They shall meet the minimum requirements:<br/>a. Minimum net site area: 1500m²<br/>b. These shall be at a minimum density of 1 unit per 250m² gross site area.<br/>c. All buildings shall comply with performance standards for Yards (A5.2.3.3 – 2), Impervious Area (A5.2.3.3 – 4), Passive Surveillance of Streets (A5.2.3.3 – 5).<br/>d. All buildings shall be a maximum height of 9m</p> |
| 13.2        | Freedom Villages   | Appropriateness of Zones and Structure Plan | Support with amendment     | Inclusion of provisions to enable a retirement village   |  | Requests inclusion of new or amended objective and/or policy would be written in response to this amendment to the plan change.  |
| 14.0        | Fire and Emergency New Zealand                             | Three Waters                                | Support with amendment     | New Performance Standard for fire fighting water supply.                                       | <p>Fire and Emergency recognise that for water supply, capacity and pressure able to be achieved by the development area is uncertain given the early stages of the structure plan development. As outlined in the plan change, an application for resource consent can be considered without public or limited notification or the need to obtain the written approval from affected parties if the land use and/or subdivision are consistent with the principles of the Pukehangi Development Area Structure Plan.</p> <p>For water supply, the key provisions for firefighting water supply are in Policy 13.3.5.2 and Rule 13.13.3.2(f), neither of which are affected by PC2. Similarly, for access, Rule 13.13.2 Roading and Access requires access to be of sufficient width. Fire and Emergency note that A5.2.3.4 and A5.2.4.4 Subdivision Performance Standards for Residential 1 Zone and Rural 2 Zone requires that the provisions of Part 13: Subdivision, apply in the Pukehangi Heights Development Area along with any other relevant provisions of the District Plan, unless otherwise specified. For the Upper Escarpment - Rural 1 Zone, there does not appear to be any requirement for compliance with Part 13: Subdivision in the Upper Escarpment - Rural 1 Zone. Fire and Emergency are concerned that if subdivision and land use consent applications are consistent with the structure plan and the requirement for notification is removed, this will remove the opportunity for Fire and Emergency to review individual applications to ensure that suitable water supply and access provisions are achieved. It is therefore essential that the specific requirements for appropriate firefighting water supply and access identified in Chapter 13 are incorporated within PC2.</p>  | <p>Fire and Emergency therefore requests that there be specific requirements in Appendix 5 of PC2 to ensure that the existing provisions for water supply in Part 13 are complied with. Fire and Emergency also recommend that development in the Pukehangi Development Area Structure Plan is undertaken in accordance with New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008 (Code of Practice). The Code of Practice is a New Zealand Standard which outlines the appropriate amount of firefighting water required in respect of the scale and use of the proposed buildings. Having adequate water supply on site will provide for the health, safety and wellbeing of people and the wider community, and therefore achieves the purpose of the RMA. The following additional performance standards are therefore sought:</p> <p>A5.2.3.4 Performance Standards – Subdivision<br/>14. Within Residential 1 Zone, the water supply required under 13.13.3.2(f) must be adequate for firefighting purposes in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.<br/>A5.2.4 Rules - Pukehangi Heights Development Area Mid Site Escarpment - Rural 2 Zone 10. Within Rural 2 Zone, the water supply required under 13.13.3.2(f) must be adequate for firefighting purposes in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008. A5.2.5 Rules - Pukehangi Heights Development Area Upper Escarpment - Rural 1 Zone 2. Within Upper Escarpment - Rural 1 Zone, the water supply required under 13.13.3.2(f) must be adequate for firefighting purposes in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008. Adequate access to both the source of a fire and a firefighting water supply is also essential to the efficient operation of Fire and Emergency. This requires access ways to provide adequate access for emergency vehicles. The access guidelines are also outlined in the Code of Practice. Fire and Emergency would be happy to work with RLC to ensure that provision of adequate water supply (and access to) for firefighting purposes within the Pukehangi Development Area Structure Plan is achieved to reduce the risk to life, property and the surrounding environment in the event of a structural fire or hazardous substances.</p>  |

SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name  | Topic                                       | Support / Oppose       | Provision                   | Reasons  | Decision Sought   |
|-------------|---|---|------------------------|-----------------------------|--|---|
| 15.0        | Ministry of Education                                 | General                                     | Support                | Schools                     | The Ministry note that section 4.13.2 of the section 32 evaluation states that the development planning process will enable local schools to programme a potential increase in roll to accommodate population growth. The Ministry recognise that the Pukehangi Heights area has been identified for future development in the District Plan for some time. While the Pukehangi Heights Structure Plan area is located close to a number of schools that have existing network capacity to absorb an increase in student numbers in the catchment, the Ministry would like to emphasise that if not carefully managed, any increase above what would be anticipated from this level of residential development and growth may have wider implications on schooling infrastructure needs.   | The Ministry requests that RLC consider the above submission when considering Plan Change 2. Given the level of increase in housing provision in the Pukehangi Heights area, the Ministry also requests that RLC engage early with the Ministry in terms of the staging and timeline of this development so the Ministry can plan for roll growth provision if needed by the existing schools and to help understand the potential impact on the school network and associated school sites. The Ministry seeks to participate with RLC where planning for schooling infrastructure may be affected by Plan Change 2 or any other matters that have the potential to facilitate residential growth of this scale. The Ministry looks forward to working with RLC on how best to represent the future for Rotorua schooling and see that provision is made for a transport network that is accessible and safe for students. |
| 15.1        | Ministry of Education                                 | Transportation and the Road Network         | Support                | Transport Routes            | Consideration of the need for safe transport routes and access to and from schools including pedestrian and cycling access and infrastructure to support the schools will need to be taken into account. This is to ensure that RLC provide a transport network that is accessible and safe as development of the Pukehangi Heights Structure Plan progresses.   | The Ministry requests that RLC consider the above submission when considering Plan Change 2. Given the level of increase in housing provision in the Pukehangi Heights area, the Ministry also requests that RLC engage early with the Ministry in terms of the staging and timeline of this development so the Ministry can plan for roll growth provision if needed by the existing schools and to help understand the potential impact on the school network and associated school sites. The Ministry seeks to participate with RLC where planning for schooling infrastructure may be affected by Plan Change 2 or any other matters that have the potential to facilitate residential growth of this scale. The Ministry looks forward to working with RLC on how best to represent the future for Rotorua schooling and see that provision is made for a transport network that is accessible and safe for students. |
| 16.0        | Dean Witehira & Jaylene Mitchell                      | Reverse Sensitivity Effects                 | Oppose                 | Setbacks                    | Our property has existing plantation forestry and proposals that would allow dwellings and buildings close to our plantings that would create reverse sensitivity effects on the rural character and amenity values of our property and environment. The District Plan has a performance standard 9.6, 16 a and d that restricts new plantings to 30m from a dwelling and building and the boundary of any residential zone and Rural 2 and 3 zone. This set back is similar to set backs provided for afforestation in the National Standard for Plantation Forestry. The set-back is good and sound environmental practice to avoid the effect of tall trees on residential developments and the impacts of residential activities upon planted forests. In particular, the set-back has regard to the safety of adjacent land users, tree and branch fall distance, fire breaks, bulk and density effects of the straight line of the plantings, potential shading, and noise, vibration and dust when trees are thinned, pruned or harvested. The potential for dwellings and buildings close to our property is contrary to the purpose of the Resource Management Act 1991 and would be contrary to the well-being and the health and safety of persons on our property and those adjacent to our property.  | Specific provisions: the structure plan, the zoning plan, policies and objectives and rules that allow dwellings and buildings within 30 metres from our boundary. A.A5.2A.2 Policies and Objectives, the objectives and policies shall be read in conjunction with the provisions from the Residential 1 and Rural 2 zoning, Objective 1 and Policies 1.1 to and including 2.1 b.A5.2.3-residential 1 c.A5.2.3.3-performance standards-1,2,6,8,9,10 d.A5.2.3.4-performance standards-1-6 e. A5.2.4, A5.2.4.3, A5.2.4.4 f. A5.2.5, A5.2.5.1, A5.2.5.3, A5.2.5.4 g. A5.2.6, A5.2.6.1, A5.2.6.2, A5.2.6.3, A5.2.6.4, A5.2.6.5<br><br>The objectives, policies and rules be amended to ensure that dwellings and buildings are not located within 30m from our property boundary.  |
| 16.1        | Dean Witehira & Jaylene Mitchell                      | Residential and Rural Residential Zones     | Oppose                 | Non-notification provisions | We are immediate neighbours and there are so many unknowns as to how actual developments will occur and therefore it is difficult to anticipate the effects upon our property. There is no certainty in the plan change as to the concept of public access to our boundary or across our property and how that will affect our amenities including our health and safety.  | Limited notification to be provided to immediate properties.  |
| 16.2        | Dean Witehira & Jaylene Mitchell                      | Appropriateness of Zones and Structure Plan | Oppose                 | Future Walkway              | The structure plan showing a future walkway to our property, all objectives, policies and rules that indicate the developments should provide for access to the boundary of our property.<br>The provisions will adversely affect the character and amenity values of our property. The provisions will adversely affect the health and safety of the use of our property. The provisions will establish expectations that any future development of our property <b>must</b> provide for public access across our property. The provisions will be a de-facto expectation of public work without the public compensation provisions afforded by public work legislation and accordingly will adversely affect the value of our property. While the Resource Management Act 1991 provides for protection of public access along water bodies there is no such provision for future general public access across private property.  | Delete the provisions that relate to public access being provided to the boundary of our property.  |
| 17.0        | Jonathan Dodd   | Transportation and the Road Network         | Support with amendment | Cycle Lanes                 | The plan states that "The Development Area will link to the Councils "Cyway" biking network via a planned 3m wide shared access along Pukehangi Road." The CyWay network is generally acceptable (by New Zealand standards) and justifiably aimed at 'everyday' cyclists, commuters, schoolchildren etc. However Pukehangi Road is a major thoroughfare for sport cyclists as it provides the only (relatively) safe and direct link between Springfield / East Rotorua and Paradise Valley. Therefore both sides of Pukehangi Road need to have safe cycle lanes for faster riders using the road - not sharing a footpath. Such cyclists routinely ride at speeds in excess of 35kph and so sharing a footpath with multiple intersections is not viable and will see sport cyclists using the road instead, as currently occurs on Lake Road (where a cyclist was hit and injured by a car only last week).. A safe cycle lane is not just a wide shoulder or painted line - these are proven to be ineffective and many cyclists are killed every year in NZ when using such ineffective 'lanes', and Rotorua cyclists have already been hit by cars on multiple occasions in such situations. What is required is a physical separation such as the design already successfully implemented by RLC on Moray St. Not implementing such a design will see Rotorua cyclists continue to be hit and ultimately killed. Please act accordingly in response to this request. There are many well-known examples in NZ of Councils ignoring similar requests to this and then having cyclists die on their watch. Please don't let RLC become another Council with blood on their hands.   | Implementation of an on-road physical cycleway separation such as the design already successfully implemented by RLC on Moray St.   |
| 18.0        | Rotorua District Residents and Ratepayers Association | Natural Hazards                             | Support with amendment | Storm water                 | The design and information gathering regarding storm water systems is still to be completed, so this cannot be fully supported until all information is available. At present there are issues with flooding downstream, and although the current design appears to address storm water, there are still unanswered questions. The plan change is intended to facilitate residential and rural residential development, allowing approximately 700 houses to be built in the proposed area. Through design controls and requirements for the partial re-vegetation of the escarpment slopes, and through storm water provisions requiring the incorporation of 'low impact' urban design and policies, it is claimed that the plan will ensure "that development does not increase the flood risk to downstream urban areas". We have five concerns.<br>1. How will the storm water systems planned allow adequate control of flow into the current storm water systems, with the risk of heavy downpours and increased annual rainfall predicted in future years?<br>2. We understand that design engineers have allowed for estimated climate change factors, however, what quantity of water capacities have they suggested can be effectively controlled with the proposed designs?<br>3. Does the RLC have past and current maintenance records for storm water and wastewater pipes in the existing residential area around the proposed subdivision that would inform design?<br>4. We are aware the proposed Structure Plan for the development hasn't been finalised as yet, and there are some allowances for overland flow paths, based on the Conceptual Storm water Plans. However, what is the RLC planning to do to prepare the existing storm water and wastewater systems to cope with the additional loadings which will exist once the subdivision is complete?<br>5. As there will be a huge increase in impermeable surfaces, such as roads, footpaths and houses, how will your engineers allow for the water having nowhere to go except into the storm water? There will be a lot less green areas available for run off and soakage, with 700 houses being built on the hillside. | How is the council going to rectify these downstream flood issues? Will this be sorted prior to the development proceeding? Does the council have current maintenance records for storm water pipes in the existing residential area around the proposed development? With a lot more impermeable surfaces due to development, how will the council engineers allow for the water having no-where to go except the storm water?   |
| 18.1        | Rotorua District Residents and Ratepayers Association | Transportation and the Road Network         | Support with amendment | Roading networks            | The documentation suggests that traffic flows from the development will be relatively low, with no significant delays to traffic turning in or out of the development, or on the performance of the wider network. When there are already delays and a lot of households have two vehicles, so that will add a lot of additional traffic to the area at certain times of day. There is already congestion on all of the surrounding networks around the proposed subdivision, so surely this needs addressing prior to work proceeding. There are also a number of schools within the area.<br>The additional load on the roading networks in the area is of significant concern to many. It is stated that there has been an increase of 4100 people in our population base since 2013. It is also estimated that there may be an additional 30,000 people living in Rotorua by 2050.<br>Three issues are stressed by our members.<br>1. The documentation states that "This assessment concludes that traffic flows from the development will be relatively low, with no significant delays to traffic turning in or out of the development, or on the performance of the wider network". How can traffic from an additional 700 houses have a 'relatively low' impact on the roading networks surrounding them?<br>2. How are the roading networks going to be altered to cope with the additional traffic flows? With these proposed subdivisions alone, the flow of traffic onto Pukehangi Road and adjoining networks, at certain times of the day, will surely impact quite heavily.<br>3. There are schools down both Malfroy and Sunset Roads, so heavy traffic flow through those areas at school times will surely have an impact on the people trying to get to work. Does the RLC plan on putting in more traffic lights or roundabouts?<br>If so, where are these proposed to go?  | How can you suggest there will be 'no significant delays to traffic flows'? Safety around schools needs to be addressed, with additional traffic management allowed for. How will this be managed?  |
| 18.2        | Rotorua District Residents and Ratepayers Association | Residential Design, Layout and Appearance   | Support with amendment | Density                     | Housing density. There are obviously regulations within Rotorua's District Plan, regarding boundary clearances for build platforms, however perhaps it needs to be clarified what you mean by 'low to medium density housing'. There are plans for a mix of development, including low and medium density residential development and large-lot residential, with provision made for small-scale commercial centres. There was a story about a residential development in Tauranga in The Herald recently. It spoke of medium density housing having section sizes of 270-300m2. There are obviously regulations in place within Rotorua's District Plan, regarding boundary clearances for build platforms, and these are different to Tauranga's regulations. However, if there will be areas within the development that have sections of that size, it will create a lot of impermeable surfaces.  | What does RLC mean by 'low to medium density housing'? Is the RLC looking at altering the regulations to allow for smaller section sizes? How many of the 700 houses will be medium density?  |

SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name  | Topic                                     | Support / Oppose       | Provision                                      | Reasons  | Decision Sought   |
|-------------|---|---|------------------------|--|--|---|
| 18.3        | Rotorua District Residents and Ratepayers Association | Construction Effects                      | Support with amendment | Earthworks and storm water                     | When development of Sunny Downs area started a couple of years ago, the ponds behind my house filled up with silt and debris, which I believe came down the storm water system for the development. This caused another ratepayer to have to sort the ponds area out, to enable the water flow to continue as it did previously. It is noted under 'Construction Effects', that there will be "careful site management" to reduce air and water borne sediment, and that the Bay of Plenty Regional Council will be placing "strict conditions on the control of dust and sediment runoff". We would ask, in the light of personal experience, that this matter be reviewed carefully. The writer lives in Rimuvale Street, and over the past five years, has walked regularly through the Benvale Ponds area, between Rimuvale and Tawavale Streets. When the ground work started in 'Sunny Downs' on Pukehangi Road about two years ago, there was a huge build up in silt and debris in the ponds, evidently having washed downstream from the site works on the hillside. This poor site management meant that Ben Benfield has had to clean it out so that the natural flow paths were resolved through the ponds area. This was, in our opinion, an additional cost to a ratepayer caused by lack of control by the RLC and the developer.   | How is the RLC going to prevent this from happening again? Are there going to be more checks in place, both onsite and downstream, to ensure this run-off is controlled adequately?   |
| 19.0        | David Crowley   | Transportation and the Road Network       | Support with amendment | Cycleways                                      | I support the residential zoning conditional on there being adequate provision for alternative transport (cycling). The off road cycle path needs to have good side road crossings, and I suggest that traffic lights may be a better solution than the proposed round-about. There also needs to be adequate on-road cycle lanes on both sides of the road through the development and on Pukehangi Rd. Longer term development may well extend beyond this current development, so the provisions made should future-proof against that.   | Council to have detailed plans reviewed by independent cycling infrastructure experts (e.g. ViaStrada) to confirm that they are high standard (not just barely adequate) and adequate to cope with even higher traffic loads than currently modelled.   |
| 20.0        | Te Arawa Group Holdings Limited                       | General                                   |                        | Strategic Planning for Urban Growth in Rotorua | As stated in the Section 32 Evaluation Report for PPC2; the latest population information from Statistics New Zealand for Rotorua estimates the population to be 72,500. This represents an increase of 800 people since 2017 and an increase of 4,100 since 2013. Rotorua is identified as a "medium growth district". This places specific requirements on Rotorua Lakes Council (RLC) to plan for future growth under the National Policy Statement on Urban Development Capacity (NPS – UDC). RLC's Spatial Plan 2018 identifies that increases in population have recently put pressure on Rotorua's housing market. TAGH agrees. In short, there are not enough homes being built for the number of additional people living in the district. Although there is a relatively large amount of zoned land already available for homes, this land is not being developed for several reasons, such as a lack of infrastructure capacity or because land is in multiple ownership, which can complicate decision making. TAGH concurs with the Spatial Plan , where it states: "... as population grows, and household size reduces because of aging, it is estimated an additional 17,000 homes may be needed by 2050 to accommodate an additional 30,000 people". The Spatial Plan identifies that in the short-term, RLC can undertake plan changes that will enable land to be used for new homes where there is existing infrastructure capacity to ensure costs are low and where land owners are willing to support development. TAGH notes that under the Rotorua Housing Accord RLC has agreed to complete the spatial planning process and subsequent District Plan changes (including rezoning). Targets have been agreed to bring sections and dwellings to market. Housing Accords aim to set targets and actions to increase the immediate and longer-term supply of land, and therefore improve the affordability of housing. TAGH agrees, subject to appropriate 'checks and balances', that the Pukehangi Heights Development Area as identified in the Spatial Plan can accommodate residential development in the short term. As stated in the Section 32 Evaluation Report for PPC2; the potential yield from the Pukehangi Heights Development Area is estimated at approximately 790 houses. The period over which this development could occur will depend on what share of growth is accommodated in the Pukehangi Heights Development Area. Overall, TAGH concurs that there is a need to provide an improved supply of land for housing; and that the Pukehangi Heights Development Area has the potential to accommodate a significant part of the projected future demand for housing in Rotorua |   |
| 20.1        | Te Arawa Group Holdings Limited                       | Residential and Rural Residential Zones   |                        | Proposed Plan Provisions                       | TAGH concurs with the purpose behind PPC2; that being to enable residential development to occur within the Pukehangi Heights Development Area in a comprehensively planned and integrated manner. TAGH agrees with the proposed objectives, policies and place-specific principles, which seek to address landscape, urban design, cultural landscape and natural hazard risk management issues specific to the Pukehangi Heights Development Area; and that supplement the general objectives and policies for the Residential 1 and Rural 2 (Rural Lifestyle) zones. TAGH agrees with the establishment of a structure plan to guide future development of land in relation to:<br>▣ landscape management;<br>▣ urban design;<br>▣ protection and enhancement of cultural values;<br>▣ access and connectivity (including active transport modes); and<br>▣ storm water infrastructure.   |   |
| 20.10       | Te Arawa Group Holdings Limited                       | Subdivision                               | Support in part        | A5.2.3   | In terms of the proposed activity status for activities in the Pukehangi Heights Development Area Residential 1 and Rural 2 Zones; TAGH is of the view that certain activities, which are currently proposed to be classified as restricted discretionary activities, could be classified as controlled activities (e.g. subdivision). This 'shift' in activity status from restricted discretionary to controlled would be better enabled through the provision of more certainty in relation to key resource management issues, such as the provision of adequate storm water infrastructure.  | Review restricted activity status for certain activities (e.g. subdivision) and consider a 'shift' from restricted discretionary to controlled; review any subsequent plan provisions (as required) (e.g. A5.2.6 – restricted discretionary activities: method of assessment ...)                     |
| 20.11       | Te Arawa Group Holdings Limited                       | Subdivision                               | Support in part        | A5.2.3   | TAGH supports in part the rule framework under A5.2.3 (Residential 1 Zone); however seeks the ability to be able to subdivide off development areas or blocks from the parent site to enable and facilitate development. For example, by subdividing a 5-10ha block from the parent site to then be on-sold to a developer without the need to provide detailed technical reports and assessments.   | That a rule/provisions be introduced under A5.2.3 to provide for 'pre-intensification' subdivisions without the need to provide detailed technical reports and assessments.   |
| 20.12       | Te Arawa Group Holdings Limited                       | Residential Design, layout and appearance | Support                | A5.2.3.3                                       | TAGH supports the proposed performance standards for land use activities.  | Retain performance standards for land use activities as proposed.   |
| 20.13       | Te Arawa Group Holdings Limited                       | Subdivision                               | Support in part        | A5.2.3.4                                       | TAGH supports the proposed performance standards for subdivision; except for A5.2.3.4(7) (Storm water Management) and A5.2.3.4 (12) (Construction Traffic) (refer below).  | Retain performance standards for land use activities as proposed; except for A5.2.3.4(7) (Storm water Management) and A5.2.3.4 (12) (Construction Traffic) (refer below)  |
| 20.14       | Te Arawa Group Holdings Limited                       | Subdivision                               | Support in part        | A5.2.3.4                                       | TAGH supports the proposed performance standards for subdivision except for those mentioned elsewhere in this submission. However, TAGH is also concerned that there is no defined scope or threshold as to when detailed technical reports and assessment as referred to in A5.2.3.4(4) (Protection and Landscape Values), A5.2.3.4(7) (Storm water Management), A5.2.3.4(8) (Natural Hazard Risk Management) and A5.2.3.4(12) (Construction Traffic) are or are not required.  | That a defined scope or threshold be provided as to when detailed technical reports and assessments (i.e. landscape and visual assessments, storm water management plans, traffic management plans) are required with subdivision applications.   |
| 20.15       | Te Arawa Group Holdings Limited                       | Natural Hazards                           | Support in part        | A5.2.3.4 (7)                                   | TAGH supports in part the proposed performance standard for storm water management; however, storm water management for future subdivision and land use activities within the Pukehangi Heights Development Area should be guided and informed by the completion of catchment modelling and associated planning; this will provide for more certainty and a sustainable use of the land resource.  | Review proposed wording for A5.2.3.4 (Storm water Management) subsequent to the completion of catchment modelling and associated planning to ensure certainty and a sustainable use of the land resource.   |
| 20.16       | Te Arawa Group Holdings Limited                       | Construction Effects                      | Support in part        | A5.2.3.4 (12)                                  | TAGH has taken expert traffic engineering advice. As a consequence of this advice, TAGH is of the view that Matipo Ave is still a valid option for construction traffic and should be retained as an option for such in the future; particularly given that the Hunt Farm ('Area B') to the northwest is held in private ownership and that Great West Road, while providing legal access to 'Area A', would result in significant environmental effects, primarily due to earthworks incidental to the construction of a temporary access road.   | A5.2.3.4 (12) to be revised with amended wording as follows:<br>For the subdivision and development of Area A, <u>construction traffic shall gain access via either:</u><br><u>(a) Area B from Pukehangi Road;</u><br><u>(b) Matipo Avenue; or</u><br><u>(c) An access road from Great West Road.</u> |
| 20.17       | Te Arawa Group Holdings Limited                       | Subdivision                               | Support in part        | A5.2.4   | TAGH supports in part the rule framework under A5.2.4 (Rural 2 Zone); however seek the ability to be able to subdivide off development areas or blocks from the parent site to enable and facilitate development. For example, by subdividing a 5-10ha block from the parent site to then be on-sold to a developer without the need to provide detailed technical reports and assessments.  | That a rule/provisions be introduced under A5.2.4 to provide for 'pre-intensification' subdivisions without the need to provide detailed technical reports and assessments  |
| 20.18       | Te Arawa Group Holdings Limited                       | Subdivision                               | Support in part        | A5.2.4.4                                       | TAGH supports the proposed performance standards for subdivision except for those mentioned elsewhere in this submission. However, TAGH is also concerned that there is no defined scope or threshold as to when detailed technical reports and assessments as referred to in A5.2.4.4(3) (Landscape Concept Plan and Visual Assessment), A5.2.4.4(4) (Storm water Management), A5.2.4.4(5) (Natural Hazard Risk Management) and A5.2.4.4(8) (Construction Traffic) are or are not required.   | That a defined scope or threshold be provided as to when detailed technical reports and assessments (i.e. landscape and visual assessments, storm water management plans, traffic management plans) are required with subdivision applications.   |
| 20.2        | Te Arawa Group Holdings Limited                       | Residential and Rural Residential Zones   |                        | Activity Status                                | In terms of the proposed activity status for activities in the Pukehangi Heights Development Area Residential 1 and Rural 2 Zones; TAGH is of the view that certain activities, which are currently proposed to be classified as restricted discretionary activities, should be classified as controlled activities. This 'shift' in activity status from restricted discretionary to controlled would provide greater certainty for the development of the Pukehangi Heights Development Area. TAGH notes that this change in activity status could be better enabled through the provision of more certainty in relation to key resource management issues, such as the provision of adequate storm water infrastructure (refer below).  |   |



SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name                  | Topic                                   | Support / Oppose | Provision                                 | Reasons   | Decision Sought  |
|-------------|---------------------------------|---|------------------|---|---|--|
| 20.3        | Te Arawa Group Holdings Limited | Residential and Rural Residential Zones |                  | Subdivision Activity Status               | TAGH is of the view that for the future urban growth aspirations of the Pukehangi Heights Structure Plan Area to be fully realised in the most efficient and effective way this uncertainty needs to be removed or reduced. This can in part be achieved by completing the modelling of the Utuhina catchment and associated planning; ideally in parallel to this plan change process.   | At present, given the current uncertainty regarding storm water management the proposed plan change sets a somewhat precautionary restricted discretionary activity status for subdivision alongside provisions which require a catchment-based Storm water Management Plan (SMP) to be prepared prior to subdivision and development occurring. TAGH is of the opinion that should the current level of uncertainty be significantly reduced or removed by completing catchment modelling for the Utuhina and finalising a storm water management plan or system for the Pukehangi Heights Development Area in parallel with the Plan Change that a controlled activity status for subdivision within the development area would be appropriate.  |
| 20.4        | Te Arawa Group Holdings Limited | Subdivision                             |                  | Pre-intensification Subdivisions          | <p>At present the proposed provisions do not provide for such 'pre-intensification' subdivisions to occur in a simple and efficient manner. For example, the proposed performance standards require a Landscape and Visual Assessment to be provided for any subdivision in Escarpment Transition Areas 1 and 2, by a suitably qualified landscape architect.</p> <p>Furthermore, any subdivision application must provide a Storm water Management Plan (SMP) in accordance with performance standards A5.2.3.4.7 &amp; A5.2.3.5.4, a Natural Hazard Risk Assessment that complies with Regional Policy Statement Appendix L – Methodology for Risk Assessment and a Traffic Management Plan for any subdivision within Area A, as well as a Noise and Vibration Management Plan.</p> <p>There are concerns that requiring an SMP for each and every subdivision (regardless of scale) may also result in ad-hoc or unintended outcomes. For example, how would RLC propose to ensure that the management of storm water from one subdivision will adequately or efficiently integrate into and have regard to other stages in order to address the issue holistically over the whole of the structure plan area?</p> <p>There is the potential that such 'pre-intensification' subdivisions could be considered inconsistent with the place-specific principles of the structure plan for the Pukehangi Heights Development Area. This would result in the subdivision being considered a discretionary activity. Consideration should be given to an amendment of the principles to provide for pre-intensification subdivision.</p>   | TAGH seeks the ability to be able to subdivide off development areas or blocks from the parent site to enable and facilitate development. For example, by subdividing a 5-10ha block from the parent site to then be on-sold to a developer. TAGH recommends that a defined scope be put around when additional technical reports and assessments are required. Otherwise, based on the provisions as proposed future small-scale subdivisions (i.e. 2-5 lots) or 'pre-intensification' subdivisions will be required to provide such detail and assessments. TAGH also requests that specific provisions be included to allow for 'pre-intensification' subdivisions as discussed above.  |
| 20.5        | Te Arawa Group Holdings Limited | Natural Hazards                         |                  | Storm water                               | <p>Currently, there is a level of uncertainty; particularly in relation to the provision of storm water infrastructure, not only for the Pukehangi Heights Structure Plan Area, but the wider environment.</p> <p>TAGH agrees that finalising a storm water management system for the development is constrained by incomplete information on the Utuhina catchment. An effective Catchment Management Plan (CMP) for the total catchment requires modelling that will enable a consideration of issues such as future development, current flooding risk, and climate change. TAGH notes that this work is underway, but not yet complete.</p> <p>Development planning for the Pukehangi Heights Development Area has proceeded using interim assumptions about the level of attenuation to protect the proposed development and downstream areas from flooding. The preliminary design criteria set for storm water management is to reduce the 1% AEP runoff to 80% of the pre-development flows. This results in large areas that need to be set aside within the development area for storm water detention basins. These areas will eventually vest with RLC.</p> <p>The extent of on-site storm water mitigation and the ultimate development yield cannot be fully confirmed until the catchment modelling and planning work is complete.</p>   | <p>Given these uncertainties, the proposed plan change provisions require a catchment-based Storm water Management Plan (SMP) to be prepared prior to subdivision and development occurring. The issues to be addressed in the SMP are set out on the Performance Standards. This includes the need to address the potential effects of storm water management measures, for example, the detention areas, on land stability and liquefaction; developers will also need storm water discharge consents from the Bay of Plenty Regional Council (BOPRC) to enable development to occur. This will require an assessment of water quality and quantity effects to be undertaken, and consideration of potentially affected persons.</p> <p>TAGH notes that RLC is in the process of renewing the comprehensive storm water discharge consents that it holds for the wider Utuhina catchment. To date, the application process has been approached on conservative design assumptions due to the lack of modelled data. Opportunities are being considered to enhance the discharge consent application process with modelled data and to widen the scope of the application to include the Pukehangi Heights Development Area. This will ensure that issues are addressed effectively and efficiently on a comprehensive basis across the catchment, thereby simplifying the future development consent process.</p> <p>TAGH is of the view; for the purpose of clarity and certainty – and as stated above, to simplify any future development consent process; that catchment modelling and associated planning be completed parallel to this plan change process. This will enable plan provisions for the Pukehangi Heights Development Area to be drafted based on the most up to date information; and will provide additional certainty for the development of the Pukehangi Heights Development Area and ensure that any potential environmental effects are managed effectively and efficiently on a comprehensive basis across the Utuhina catchment.</p> |
| 20.6        | Te Arawa Group Holdings Limited | Construction Effects                    |                  | Traffic                                   | <p>Residents of Matipo Avenue have raised specific concerns about the impact of development and construction traffic on Matipo Avenue from the TAGH land. Matipo Avenue is narrow and has a steep gradient where it rises from Pukehangi Road, which reduces its capacity for additional traffic to be handled safely.</p> <p>Residents in Matipo Avenue were submitters opposed to the proposed "Twin Oaks" Development Plan through the last District Plan Review. Their submissions resulted in standards being included in the District Plan to control construction access, development scale, and internal road connections. Residents want to maintain these standards as an outcome of the proposed plan change.</p> <p>A range of options have been developed and evaluated for access to the Twin Oaks land ('Area A as shown on the Proposed Structure Plan (refer Figure 1 above). As an outcome of this planning process, RLC are of the view that the concerns raised by residents have been recognised and provided for by the following provisions being included in the Plan Change:</p> <ul style="list-style-type: none"><li>- Limiting the likely number of vehicle movements on Matipo Avenue from Twin Oaks (Area A) to no more than those enabled under the current District Plan provisions;</li><li>- Restricting land development construction vehicles from using Matipo Avenue, with access instead being gained from Great Western Road, or Pukehangi Road via the Hunt Farm land.</li></ul> <p>The traffic assessment prepared by Stantec on behalf of RLC concludes that if the road network is developed as shown on the Structure Plan, the number of vehicle movements on Matipo Avenue from Twin Oaks (Area A) will be less than those enabled under the current District Plan provisions.</p> | <p>In relation to construction traffic; TAGH has taken expert traffic engineering advice. As a consequence of this advice, TAGH is of the view that Matipo Ave is still a valid option for construction traffic and should be retained as an option for such in the future; particularly given that the Hunt Farm ('Area B') to the northwest is held in private ownership and that Great West Road, while providing legal access to 'Area A', would result in significant environmental effects, primarily due to earthworks involved in the construction of a temporary access road.</p> <p>Overall, TAGH supports the proposed plan provisions insofar as transportation issues are concerned; except for construction traffic provisions. Subject to the amendments sought in relation to construction traffic; the transportation provisions will provide for a range of options in the future for both (a) construction traffic and (b) traffic generation as a result of completed development.</p>   |
| 20.7        | Te Arawa Group Holdings Limited | Residential and Rural Residential Zones | Support in part  | A5.2A.1                                   | TAGH supports the identification of the Pukehangi Heights Development Area as an appropriate area for urban growth, and the place-specific principles proposed. Consideration should be given to an amendment of the principles to provide for pre-intensification subdivision.   | Retain 'introduction' as proposed for the Pukehangi Heights Development Area. Consideration should be given to an amendment of the principles to provide for pre-intensification subdivision.  |
| 20.8        | Te Arawa Group Holdings Limited | Residential and Rural Residential Zones | Support in part  | A5.2A.2                                   | TAGH supports the proposed objectives and supporting policies for the Pukehangi Heights Development Area; except for Policy 3.1 (Flooding and Storm water) (refer below)  | Retain proposed objectives and supporting policies as proposed; except for Policy 3.1 (Flooding and Storm water) (refer below)   |
| 20.9        | Te Arawa Group Holdings Limited | Natural Hazards                         | Support in part  | Policy 3.1                                | <p>TAGH supports in part Policy 3.1 (Flooding and Storm water) as proposed; TAGH notes that RLC is in the process of renewing the comprehensive storm water discharge consents that it holds for the wider Utuhina catchment. To date, the application process has been approached on conservative design assumptions due to the lack of modelled data. Opportunities are being considered to enhance the discharge consent application process with modelled data and to widen the scope of the application to include the Pukehangi Heights Development Area. This will ensure that issues are addressed effectively and efficiently on a comprehensive basis across the catchment, thereby simplifying the future development consent process.</p> <p>TAGH is of the view; for the purpose of clarity and certainty – and as stated above, to simplify any future development consent process; that catchment modelling and associated planning be completed parallel to this plan change process. This will enable plan provisions for the Pukehangi Heights Development Area to be drafted based on the most up to date information; and will provide additional certainty for the development of the Pukehangi Heights Development Area and ensure that any potential environmental effects are managed effectively and efficiently on a comprehensive basis across the Utuhina catchment.</p>  | Review proposed wording for Policy 3.1 (Flooding and Storm water) subsequent to the completion of catchment modelling and associated planning to ensure purpose and intent of policy framework is effective and efficient.   |
| 21.0        | Utuhina Valley Farm             | General                                 |                  | Demand for Residential Land               | <p>The proposed Plan Change 2 refers to the Rotorua Housing Accord however there is no mention for the provision for low cost housing that is currently required in this District.</p> <p>The document indicates that additional demand is required however rezoning of the land will not necessarily result in vacant sites as development is determined by economic factors and the residential market. It is noted that the land has been zoned for Future Development and this has not occurred due to storm water disposal management issues. The District Plan currently has staging mechanisms for this zone to ensure that the development occurs in a systematic manner. The staging mechanisms have been removed from PC2, however it is noted that the Te Arawa Group Holdings Land is significantly affected by the development of adjoining land first.</p> <p>The caldera rim landscape is noted as being highly valued by the Rotorua community therefore if residential demand is required then it should not be located on the caldera rim. It is suggested that the development is provided in areas of the District where the caldera rim is not prominent such as Eastside or Ngongotaha.</p>   | <p>i) That additional information or Section 32 analysis is provided to justify why lost cost housing is not provided;</p> <p>ii) The staging of the development is not adequately defined and prohibits development of Te Arawa Group Holding land until the Hunt land is developed;</p> <p>iii) No development should be provided on the caldera rim.</p>  |
| 21.10       | Utuhina Valley Farm             | Residential and Rural Residential Zones |                  | Consistency with District Plan Provisions | There are performance standard anomalies between the current Residential 1 zone and the PC2 Residential 1 zone rules. For example: All yards, and outdoor living areas are reduced in PC2. This will create confusion and inconsistency within the District. Amenity and residential, character will be compromised through reduced performance standards.  | All current Residential 1 zone performance standards for setbacks, outdoor living areas should be adopted for PC2.   |

SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name           | Topic                                       | Support / Oppose | Provision   | Reasons   | Decision Sought  |
|-------------|--------------------------|---|------------------|---|---|--|
| 21.1        | Utuhina Valley Farm      | Subdivision                                 |                  | Staging of Development  | The current planning framework provides for staging of the development. As noted above, PC2 removes the staging mechanisms, although it is noted that the Te Arawa Group Holding Land is significantly affected by the development of adjoining land first.   | i) The staging of the development is not adequately defined and prohibits development of Te Arawa Group Holding land until the Hunt land is developed.   |
| 21.11       | Utuhina Valley Farm      | Reverse Sensitivity Effects                 |                  | Yard setbacks   | There is no suitable buffer between proposed structures and our land. We do not accept that the proposed structure setback distances are adequate.  | That the minimum setback from the Rural 1 zone is 10.0m for the Residential 1 and Rural 2 zone (including southern slopes).  |
| 21.12       | Utuhina Valley Farm      | Residential and Rural Residential Zones     |                  | Discretionary Activity Assessment Criteria                            | There is not any Discretionary assessment criteria therefore it is unknown to what discretion Council will have for any Discretionary activity.   |  |
| 21.13       | Utuhina Valley Farm      | Subdivision                                 |                  | Consistency with District Plan Provisions                             | The minimum lot sizes should also be consistent. PC2 proposes an average minimum lot size for Rural 2.  | Remove reference to a “minimum average area of lots in the Mid Site Escarpment Area shall be 4,000m2.” Replace with “net average area of lots in the Mid Site Escarpment Area shall be 4,000m2.”   |
| 21.14       | Utuhina Valley Farm      | Landscape and Ecological Values             |                  | Reflectivity  |   | Impose the reflectivity requirement of 37% for all land within PC2.  |
| 21.2        | Utuhina Valley Farm      | Appropriateness of Zones and Structure Plan |                  | Medium density location and Open space and rural aspect               | The Boffa Miskell report (March 2019) for proposed Plan change 2 clearly states that there will be substantial landscape and visual change with the proposed change of land use.<br>“Although the proposal does present a defined transition from a pastoral outlook, to one of a more developed nature, this is consistent with existing development patterns”.<br>i) To allow continued development consistent with previous developments will dramatically change the current rural outlook. To adopt the position that what was previously acceptable is not necessarily applicable or acceptable for the future.<br>ii) Pukehangi Southern slopes should be retained as either farm land or retired with appropriate native plantings. Production exotic forestry would not be appropriate due to contour and proximity to the Utuhina Stream.<br>iii) The existing built up nature of Matipo Avenue would allow the Mid-site Escarpment and Escarpment Transition area 2 of TGH land to be treated as Residential 1 without lowering any visual amenity effect.   | iv) Any high / medium density residential development should be confined to the areas shown on the PC2 map as Residential 1. To retain the current open spaces and rural aspect, Rural 2 areas should either be left undeveloped / planted consistent with the adjacent Parklands planting or the Lot sizes increased significantly from what is proposed, with the exception of iii) above.   |
| 21.3        | Utuhina Valley Farm      | Landscape and Ecological Values             |                  | Planting consistent with Parklands                                    | There is no supporting ecological assessment for the PC2 identifying the future ecological benefits of fauna and flora adjacent or within the residential zones.  | i) Any planting should be consistent with the Pukehangi Parklands Development.   |
| 21.4        | Utuhina Valley Farm      | Three Waters                                |                  | Wastewater  | Wastewater:<br>It is understood that the existing RDC wastewater treatment plant cannot sustain the additional dwellings.<br>It is understood that if reticulation cannot be achieved to the Rural 2 zone then a minimum of 8,000m2 will be required for on-site systems to be provided.  | Development should not be undertaken until the RDC Wastewater Treatment Plant can accommodate the additional load.   |
| 21.5        | Utuhina Valley Farm      | Natural Hazards                             |                  | Storm water   | The OPUS report memo dated January 2020 (Version 2) states that (emphasis underlined):<br>“However, and as mentioned previously, BOPRC are currently constructing a model for the Greater Utuhina Catchment in Mike Flood that will help to better understand the downstream impacts of development and the proposed mitigations.<br><u>After this model becomes available, the appropriate RPS Natural Hazard Risk assessments can then take place to further understand the potential impacts of the development and the appropriate levels of mitigation deemed acceptable for the catchment.</u><br><u>The significance of this is still an unknown item and remains a risk for the developments at Pukehāngi Heights being able to achieve the yield and urban form identified to date within the proposed Structure Plan.</u> Equally, without this tool being available, the ability to test potential mitigation approaches (over and above those presented below) is limited at this stage and remains an additional risk.<br>To address this issue, the structure plan has been developed using interim assumptions (reduction in the 1% AEP to 80% of pre-development flows).<br>The proposed Plan Change provisions include the requirement for a catchment based Storm water Management Plan to be prepared prior to subdivision and development occurring. Furthermore, to capture this risk and avoid it occurring there is a requirement in place that before development occurs, a storm water discharge consent will also need to be approved from the Bay of Plenty Regional Council. This will assess both water quality and quantity.” | That the management of storm water is undertaken prior to PC2 approval. There is no point re-zoning the land if the disposal of storm water cannot be undertaken and the assessment has not been resolved. It is not appropriate to approve this zone change in principle subject to storm water as the downstream effects cannot be determined.   |
| 21.6        | Utuhina Valley Farm      | Three Waters                                |                  | Water   | The supply of water has not been determined and should be finalised prior to development. The effects of additional aquifer drawdown has not been identified.<br>PC2 indicates that a water reservoir will be provided however the location has not been determined.  | i) That the supply and management of water is undertaken prior to PC2 approval. There is no point re-zoning the land if the supply of water cannot be undertaken and the assessment has not been resolved. It is not appropriate to approve this zone change in principle subject to water as the effects on the aquifers cannot be determined.<br>ii) The location of the water reservoir needs to be identified now as this is potentially a significant visual ‘eye-sore’ for the site. We are opposed to any reservoir placement being located adjacent to our property or located on the caldera rim.   |
| 21.7        | Utuhina Valley Farm      | Transportation and the Road Network         | Oppose           | Pukehangi Road  | The use of Pukehangi Road has become increasing busy over the last 10 years and has been assessed as being able to accommodate the additional traffic. However, it is noted in the Stantec report dated February 2019 that Pukehangi Road is under width and cannot currently support the development.<br><br>“Pukehangi Road is classified as a Minor Arterial which would indicate a desirable width of 13.0m or greater based on the above standards. The required width is directly related to parking and /or cyclist demands. The existing width of Pukehangi Road, at approximately 9.7m, provides for two traffic lanes plus a narrow flush median and narrow shoulders is not sufficient to accommodate parking.”  | Pukehangi Road needs to be widened to accommodate the additional development, on-road parking, and the proposed cycleway.  |
| 21.8        | Utuhina Valley Farm      | Construction Effects                        | Oppose           | Construction Traffic  | The use of Great West Road to serve the development is opposed. Great West Road is a single lane metalled road maintained by the landowners, not Council.<br>Use of this road for construction traffic and /or walkers will result in significant safety issue as there are blind corners, rural stock movements, rural stock trucks, rural contractors and forestry vehicles utilising the road.   | Permanent removal of the proposed walkway and cycleway from Great West Road.<br><br>The longevity of the ‘construction road’ is not known and is therefore is opposed.   |
| 21.9        | Utuhina Valley Farm      | Reverse Sensitivity Effects                 |                  | Adjoining Rural Property  | Utuhina Valley Farm operates a legitimate rural farming operation. Any proposed development cannot have any limiting effects on our current farming operation.<br><br>It is not considered that the provisions of PC2 adequately address the potential for visual amenity, noise and odour to be addressed.   | i) That a reverse sensitivity / no complaints covenant are imposed on the subject land adjoining our property. This can be facilitated through PC2, similar to those covenants actioned by other Councils through their District Plans such as Auckland City Council.<br><br>ii) A permanent and immediate vegetative screen is established on the common boundary of our property and the subject land. The vegetation selection and buffer width is to be determined by the developer, Council and Utuhina Valley Farm.  |
| 22.0        | Ngāti Kearoa Ngāti Tuarā | Culture, Archaeology and Heritage           |                  | Appendix 5, Policy 2.9<br>Appendix 5, Performance Standard 2.4.4.6.10 | Te Rūnanga o Ngāti Kearoa Ngāti Tuarā has engaged with the Rotorua Lakes Council regarding Pukehāngi: Plan Change 2 and submitted a Cultural Impact Assessment in August 2019. This report briefly describes the role that Ngāti Kearoa Ngāti Tuarā have held as mana whenua in the Tihi-o-Tonga and Pukehāngi area over several hundred years.<br><br>The proposal for the development of Pukehāngi Heights will result in the land being completely and starkly alienated with substantial adverse effects on the cultural values of Ngāti Kearoa Ngāti Tuarā and other hapū of Te Arawa. To help mitigate these effects, we recommend that Council continue ongoing consultation and collaboration with Ngāti Kearoa Ngāti Tuarā, as part of the Pukehāngi development process, to inform decisions on land use, subdivision and development and taking into account the Iwi Environmental Management Plan. We also seek that Council acknowledge the Ngāti Kearoa Ngāti Tuarā history of, and relationship with, the Pukehāngi area through the plan change and development process.<br><br>We are pleased that the Rotorua Lakes Council has now entered into discussions with Ngāti Kearoa Ngāti Tuarā to work toward a Memo of Understanding which formalises the relationship and ensures that the aspirations of both the iwi and Council are progressed in a collaborative and mutually beneficial manner.  | We note that the Plan Change 2: Pukehāngi Heights, Provisions for Notification, Appendix 5, Policy 2.9 refers only to ‘cultural sites and areas within the Development Area ...’. We recommend that this be extended to include areas downstream affected by the development, eg, cultural sites at Tarewa.<br><br>Appendix 5, Performance Standard 2.4.4.6.10 refers to Protection of Cultural Identity and Sites of Archaeological or Cultural Importance. We recommend that this include cultural sites identified by traditional stories despite no physical evidence remaining. For example, Ngāti Kea Ngāti Tuarā have identified from traditional stories the approximate location within the development area of an ancient pā, Puketapu Pā, but no physical evidence was discovered in the archaeological investigation. This raises two points:<br>1. We recommend that all sites of cultural importance be identified and protected, not just those for which there is archaeological evidence.<br>2. We are conscious that some physical evidence may be uncovered during large-scale earthworks. Although there are heritage protocols and processes in place it is unclear how or whether any development plans will be amended to take account of such finds. This performance standard needs to take such an event into account. |
| 22.1        | Ngāti Kearoa Ngāti Tuarā | Three Waters                                |                  | Karamu Takina Spring  | Water Supply<br>The closest and most likely source of water supply for the Pukehāngi development is the Central Urban Water Supply drawn from the Karamu Takina Spring. The Karamu Takina and Mawae Springs are significant sites for Ngāti Kearoa Ngāti Tuarā. The manner in which they were acquired by the council has been contentious for the iwi since 1954. We are pleased that the Rotorua Lakes Council has now entered into discussions with Ngāti Kearoa Ngāti Tuarā to work toward a mutually acceptable agreement regarding ownership of the land and ongoing management of the Karamu Takina Spring.  |  |
| 22.2        | Ngāti Kearoa Ngāti Tuarā | General                                     |                  | Housing Strategy  | Te Rūnanga o Ngāti Kearoa Ngāti Tuarā appreciate that there is an accommodation shortage in Rotorua and the Pukehāngi Heights Development is an opportunity to provide new homes. However, it is difficult to understand how this development, beyond increasing land supply for housing, will actually work towards addressing the factors that Council has identified as representing a ‘significant community need’. That is, the pressure on housing stock of properties being let as holiday rental accommodation and growing homelessness.  | As in most parts of Aotearoa, Māori whānau in Rotorua are over-represented in lower socioeconomic groups and the availability of affordable rental accommodation is a growing concern for Ngāti Kearoa Ngāti Tuarā. Home ownership is already beyond the means of many of its whānau. Ngāti Kearoa Ngāti Tuarā is unaware of any particular strategies Council will be adopting as part of this development to ensure that rental and housing affordability issues are addressed, including for example to ensure that developers make provision for affordable housing within the subdivision. Likewise, Ngāti Kearoa Ngāti Tuarā is unaware of any particular strategies Council will be adopting as part of this development to address homelessness, such as working with developers and relevant agencies to offer social housing solutions. We would like to be involved in the broader Council strategy of providing more housing for lower income families, as well as see that through this Plan Change developers are required to make provision for affordable housing within the subdivision.  |
| 22.2        | Ngāti Kearoa Ngāti Tuarā | Natural Hazards                             |                  | Storm water   | Water Management<br>The Pukehāngi Heights Development could result in the development of about 800 houses with large areas of impervious surfaces, tar-seal and/or concrete. This has severe implications for management of storm-water, waste water and sewerage. Ngāti Kearoa Ngāti Tuarā still has reservations that that these issues are not adequately addressed.   | Increased volume of storm-water flowing into the Mangakakahi and Utuhina Streams. Ngāti Kearoa Ngāti Tuarā supports the Rotorua Lakes Council undertaking of further catchment modelling, as outlined in Provisions for Notification, Appendix 5, Policy 3.1, but we want to be assured that any downstream flooding to areas including Riri Street, Sunset Road, and our kāinga at Tārewa Pounamu, will be avoided.<br>The plan change policies should clearly state that developments which do not demonstrate a reduction in flood risk and an improvement in water quality be refused consent.   |



SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name           | Topic                             | Support / Oppose | Provision                       | Reasons  | Decision Sought   |
|-------------|--------------------------|-----------------------------------|------------------|---------------------------------|--|---|
| 22.3        | Ngāti Kearoa Ngāti Tuarā | General                           |                  | Consultation                    | A good consultation process that recognises the importance of, and provides for, Māori cultural values associated with this Pukehāngi landscape can help to build an effective working relationship between Ngāti Kearoa Ngāti Tuarā and the Rotorua Lakes Council and improved outcomes for both the iwi and the Council. In relation to this process, however, Ngāti Kearoa Ngāti Tuarā is disappointed with some aspects of the consultation undertaken by Council, and raises a question about its meaningfulness.   | <ul style="list-style-type: none"><li>• The Section 32 Evaluation Report and proposed plan provisions were finalised and the plan change presented to Council for a notification decision to be made prior to our CIA being completed. It is notable that very little change has been made to the Section 32 Evaluation Report notified with the Plan Change to reflect the CIA.</li><li>• Until the CIA and Archaeological Assessment were completed it is difficult to see how Council and the Minister for the Environment, in approving the plan change for notification, could have been satisfied that all resource management issues (including those yet to have been raised as a concern by Ngāti Kearoa Ngāti Tuarā) had been appropriately addressed.</li><li>• The Section 32 Evaluation Report provided to the Council and Minister could therefore not include, as required by the RMA:<ul style="list-style-type: none"><li>⑦ all advice received from iwi authorities on the proposal, and</li><li>⑧ how the proposal responds to that advice, including reference to any proposed provisions that are intended to give effect to the advice.</li></ul></li><li>• Despite the assertion in numerous reports to Council that there have been ample opportunities provided to iwi to engage with the plan change through the District Planning Review and preparation of the Spatial Plan, this is the first time Council has invited Ngāti Kearoa Ngāti Tuarā to prepare a CIA in relation to the proposal. The Rūnanga is unaware of any other CIA reports having been prepared to date.</li><li>• All mana whenua need to be engaged with Councils at an early stage and work through the planning and development processes, which can take some years. However, Councils need to take into account that iwi get inundated with requests for consultation from government agencies, national and regional, on a wide range of issues, and they are not resourced to participate in these processes. Councils need to provide appropriate levels of funding for this iwi consultation.</li></ul> |
| 22.3        | Ngāti Kearoa Ngāti Tuarā | Three Waters                      |                  | Water quality                   | Water Management<br>The Pukehāngi Heights Development could result in the development of about 800 houses with large areas of impervious surfaces, tar-seal and/or concrete. This has severe implications for management of storm-water, waste water and sewerage. Ngāti Kearoa Ngāti Tuarā still has reservations that that these issues are not adequately addressed.  | Water quality problems with increased contamination from waste-water of streets and sumps, oils and plastics, silt and faecal coliforms from birds and animals, all washing downstream into the Mangakakahi, Otamatea, and Utuhina Streams and into Lake Rotorua. Ngāti Kearoa Ngāti Tuarā support the proposed Pukehāngi development using a low impact urban design for storm-water and recommend that all developers of each subdivision be required to use low impact design for storm water to decrease the potential impact on the Utuhina stream. We want to be assured that this development will not lead to a decrease in water quality in the Mangakakahi and Utuhina streams and further degradation of Lake Rotorua.<br>Ngāti Kearoa Ngāti Tuarā want to be assured that Rotorua Lakes Council recognises and provides for the national significance of freshwater and Te Mana o te Wai through giving effect to the National Policy Statement for Freshwater Management 2014. The Policy Statement requires Council to consult and engage with our communities, to set objectives for the state of fresh water bodies in its region and to set limits to meet these objectives. That includes requirements to: <ul style="list-style-type: none"><li>• engage with tangata whenua to identify the values they have for freshwater;</li><li>• involve iwi and hapū in decision-making and management of freshwater; and</li><li>• determine the appropriate set of methods for the objectives and limits.</li></ul>  |
| 22.4        | Ngāti Kearoa Ngāti Tuarā | General                           |                  | Streamlined Planning Process    | <ul style="list-style-type: none"><li>• Despite Ngāti Kearoa Ngāti Tuarā expressing concern in its initial feedback about the use of the Streamlined Planning Process for the plan change, Council made a decision to proceed in any event without any attempt to better understand the basis for Ngāti Kearoa Ngāti Tuarā’s position or to provide a further opportunity to explain its position.</li><li>• Many members of Te Rūnanga o Ngāti Kearoa Ngāti Tuarā expressed disappointment in the way our views had been represented to Council, and dismay and diminished trust in Council as a result of these processes, particularly the decision regarding the streamlined process.</li><li>• Ngāti Kearoa Ngāti Tuarā are concerned about how completely and accurately their position was presented to the Minister before making this decision.</li><li>• Given the significant issues that have been identified and/or substantiated, including in relation to Māori cultural interests provided for under Part 2 of the RMA, Ngāti Kearoa Ngāti Tuarā is not convinced that the use of the Streamlined Planning Process (in which there is no recourse to the Environment Court) is ‘appropriate and proportionate’ as asserted by Council.</li></ul> | The position of Te Rūnanga o Ngāti Kearoa Ngāti Tuarā as articulated in the Cultural Impact Assessment remains. We cannot support the Plan Change and rezoning of this area to enable subdivision and development unless the concerns raised in this submission and the CIA are appropriately and adequately addressed.<br>Without limiting the above relief sought, Ngāti Kearoa Ngāti Tuarā seek that: <ul style="list-style-type: none"><li>• Council further amend the plan provisions (whether that be objectives, policies, rules or other provisions) in consultation with Ngāti Kearoa Ngāti Tuarā. While some changes have been made by Council since the CIA was completed, presumably made to address Ngāti Kearoa Ngāti Tuarā concerns as set out in the CIA, we were not involved by Council in the drafting, and were given only limited opportunity to review and comment as to their adequacy prior to being incorporated in the Plan Change. Ngāti Kearoa Ngāti Tuarā considers the changes to be inadequate. Ngāti Kearoa Ngāti Tuarā is also concerned about the implications of including reference to the CIA in the plan.</li><li>• Council undertake the further landscape assessment the CIA recommended in order to take account of cultural values and amend plan provisions (whether that be objectives, policies, rules or other provisions) as a result.</li></ul> Ngāti Kearoa Ngāti Tuarā has also had the opportunity to review the submission lodged by Te Arawa Lakes Trust which further particularises amendments relevant to our interests. Ngāti Kearoa Ngāti Tuarā adopt the relief sought in that submission in addition to the above relief.   |
| 22.4        | Ngāti Kearoa Ngāti Tuarā | Three Waters                      |                  | Wastewater                      | Rotorua Lakes Council already has issues with sewerage management and an additional 700-800 houses will increase this burden.  | Ngāti Kearoa Ngāti Tuarā want to be assured that the sewerage from this development does not lead to any further degradation of Mangakakahi and Utuhina streams or Lake Rotorua.  |
| 23.0        | Renee Pureti Kiriona     | General                           | Oppose           | Housing Supply                  | Takahi te karanga me te wairua o tangata whenua: Tangata whenua have been asking Rotorua Lakes Council, and its predecessors, for generations to make changes to their district plan to remove obstacles so they can build much needed and affordable housing for them, many of whom are homeless, on their ancestral lands. The council has not given meaningful ear to our call and has instead prioritised their energies and resources toward wealthy corporate developers opening up land for those with deep pockets, most of whom are not tangata whenua.   |   |
| 23.1        | Renee Pureti Kiriona     | General                           | Oppose           | Housing Supply                  | Takahi te Tiriti o Waitangi: Any move by council and Crown (including the Minister for the Environment) to continue advancing this plan change, before making the district plan changes needed for tangata whenua housing, in my opinion is a breach of article three of the Treaty which aims to ensure that tangata whenua are not treated like second class citizens in their own land. Furthermore, while this development will increase housing supply in Rotorua, it will not reduce the gap between Māori and non-Māori home ownership. In fact, it will likely widen that gap.   |   |
| 23.2        | Renee Pureti Kiriona     | Culture, Archaeology and Heritage | Oppose           | Cultural Impact Assessment      | Takahi te mana o te iwi: The serious concerns of Ngāti Kearoa Ngāti Tuarā, outlined in their cultural impact assessment report, have not been addressed. I agree with the iwi that if this development proceeds as is then it will be to the detriment of waahi tapu, waahi tupuna and their cultural values.  |   |
| 23.3        | Renee Pureti Kiriona     | Three Waters                      | Oppose           | Karamu Takina Spring            | Takahi te mauri o te puna: More pressure will be placed on Karamu Takina Springs, which already supplies water to 60% of the city, and possibly also Mawai Springs, which is near Takina, due to more than 700 households now needing water supply; yet research on both these springs is lacking and tangata whenua still have outstanding matters yet to be addressed by the Crown over freshwater ownership and management.   |   |
| 23.4        | Renee Pureti Kiriona     | Three Waters                      | Oppose           | Water Quality                   | Takahi te mauri o te awa: The subdivision will increase the amount of contaminated storm water flowing into the already polluted Utuhina stream; and the mitigation measures to address this are based on assumptions due to the lack of catchment research and modelling.   |   |
| 23.5        | Renee Pureti Kiriona     | Three Waters                      | Oppose           | Water Quality/Lake Rotorua      | Takahi te mauri o te roto moana: Te Utuhina flows into Te Rotorua nui a Kahumatamomoe (Lake Rotorua) which is already under threat from current storm water runoff and another proposal by council to discharge 20 million litres of treated sewage every day for the next 30 years.   |   |
| 23.6        | Renee Pureti Kiriona     | General                           | Oppose           | Streamlined Plan Change Process | Takahi te tika: The streamlined process takes mana away from tangata whenua and residents and places it in the hands of a Minister in Wellington because tangata whenua and residents will not have the option, as usually the case, to appeal this proposal in the Environment Court.   |   |
| 24.0        | Ngaire Khan              | General                           | Oppose           | Housing Supply                  | Takahi te karanga me te wairua o tangata whenua: Tangata whenua have been asking Rotorua Lakes Council, and its predecessors, for generations to make changes to their district plan to remove obstacles so they can build much needed and affordable housing for them, many of whom are homeless, on their ancestral lands. The council has not given meaningful ear to our call and has instead prioritised their energies and resources toward wealthy corporate developers opening up land for those with deep pockets, most of whom are not tangata whenua.   |   |
| 24.1        | Ngaire Khan              | General                           | Oppose           | Housing Supply                  | Takahi te Tiriti o Waitangi: Any move by council and Crown (including the Minister for the Environment) to continue advancing this plan change, before making the district plan changes needed for tangata whenua housing, in my opinion is a breach of article three of the Treaty which aims to ensure that tangata whenua are not treated like second class citizens in their own land. Furthermore, while this development will increase housing supply in Rotorua, it will not reduce the gap between Māori and non-Māori home ownership. In fact, it will likely widen that gap.   |   |
| 24.2        | Ngaire Khan              | Culture, Archaeology and Heritage | Oppose           | Cultural Impact Assessment      | Takahi te mana o te iwi: The serious concerns of Ngāti Kearoa Ngāti Tuarā, outlined in their cultural impact assessment report, have not been addressed. I agree with the iwi that if this development proceeds as is then it will be to the detriment of waahi tapu, waahi tupuna and their cultural values.  |   |
| 24.3        | Ngaire Khan              | Three Waters                      | Oppose           | Karamu Takina Spring            | Takahi te mauri o te puna: More pressure will be placed on Karamu Takina Springs, which already supplies water to 60% of the city, and possibly also Mawai Springs, which is near Takina, due to more than 700 households now needing water supply; yet research on both these springs is lacking and tangata whenua still have outstanding matters yet to be addressed by the Crown over freshwater ownership and management.   |   |
| 24.4        | Ngaire Khan              | Three Waters                      | Oppose           | Water Quality                   | Takahi te mauri o te awa: The subdivision will increase the amount of contaminated storm water flowing into the already polluted Utuhina stream; and the mitigation measures to address this are based on assumptions due to the lack of catchment research and modelling.   |   |
| 24.5        | Ngaire Khan              | Three Waters                      | Oppose           | Water Quality/Lake Rotorua      | Takahi te mauri o te roto moana: Te Utuhina flows into Te Rotorua nui a Kahumatamomoe (Lake Rotorua) which is already under threat from current storm water runoff and another proposal by council to discharge 20 million litres of treated sewage every day for the next 30 years.   |   |
| 24.6        | Ngaire Khan              | General                           | Oppose           | Streamlined Plan Change Process | Takahi te tika: The streamlined process takes mana away from tangata whenua and residents and places it in the hands of a Minister in Wellington because tangata whenua and residents will not have the option, as usually the case, to appeal this proposal in the Environment Court.   |   |
| 25.0        | Huiarangī Honana         | General                           | Oppose           | Housing Supply                  | Takahi te karanga me te wairua o tangata whenua: Tangata whenua have been asking Rotorua Lakes Council, and its predecessors, for generations to make changes to their district plan to remove obstacles so they can build much needed and affordable housing for them, many of whom are homeless, on their ancestral lands. The council has not given meaningful ear to our call and has instead prioritised their energies and resources toward wealthy corporate developers opening up land for those with deep pockets, most of whom are not tangata whenua.   |   |

SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name   | Topic                                       | Support / Oppose      | Provision                       | Reasons   | Decision Sought  |
|-------------|------------------|---|-----------------------|---------------------------------|---|--|
| 25.1        | Huiarangi Honana | General                                     | Oppose                | Housing Supply                  | Takahi te Tiriti o Waitangi: Any move by council and Crown (including the Minister for the Environment) to continue advancing this plan change, before making the district plan changes needed for tangata whenua housing, in my opinion is a breach of article three of the Treaty which aims to ensure that tangata whenua are not treated like second class citizens in their own land. Furthermore, while this development will increase housing supply in Rotorua, it will not reduce the gap between Māori and non-Māori home ownership. In fact, it will likely widen that gap.  |  |
| 25.2        | Huiarangi Honana | Culture, Archaeology and Heritage           | Oppose                | Cultural Impact Assessment      | Takahi te mana o te iwi: The serious concerns of Ngāti Kearoa Ngāti Tuarā, outlined in their cultural impact assessment report, have not been addressed. I agree with the iwi that if this development proceeds as is then it will be to the detriment of waahi tapu, waahi tupuna and their cultural values.   |  |
| 25.3        | Huiarangi Honana | Three Waters                                | Oppose                | Karamu Takina Spring            | Takahi te mauri o te puna: More pressure will be placed on Karamu Takina Springs, which already supplies water to 60% of the city, and possibly also Mawai Springs, which is near Takina, due to more than 700 households now needing water supply; yet research on both these springs is lacking and tangata whenua still have outstanding matters yet to be addressed by the Crown over freshwater ownership and management.  |  |
| 25.4        | Huiarangi Honana | Three Waters                                | Oppose                | Water Quality                   | Takahi te mauri o te awa: The subdivision will increase the amount of contaminated storm water flowing into the already polluted Utuhina stream; and the mitigation measures to address this are based on assumptions due to the lack of catchment research and modelling.  |  |
| 25.5        | Huiarangi Honana | Three Waters                                | Oppose                | Water Quality/Lake Rotorua      | Takahi te mauri o te roto moana: Te Utuhina flows into Te Rotorua nui a Kahumatamomoe (Lake Rotorua) which is already under threat from current storm water runoff and another proposal by council to discharge 20 million litres of treated sewage every day for the next 30 years.  |  |
| 25.6        | Huiarangi Honana | General                                     | Oppose                | Streamlined Plan Change Process | Takahi te tika: The streamlined process takes mana away from tangata whenua and residents and places it in the hands of a Minister in Wellington because tangata whenua and residents will not have the option, as usually the case, to appeal this proposal in the Environment Court.  |  |
| 26.0        | The Hunt Family  | Subdivision                                 | Supports in principle | Subdivision Activity Status     | <p>The question as to the whether a Controlled Activity status for subdivision within the Pukehangi Heights Development Area is appropriate is largely one of certainty. In other words, how much certainty will a Controlled Activity status provide in terms of achieving the desired outcomes for development within the Pukehangi Heights Development Area?</p> <p>The Plan Change was notified with a Restricted Discretionary Activity status that would apply to any subdivision application that is consistent with the principles of the Structure Plan for the Pukehangi Heights Development Area (listed under A5.2A.1) and that complies with the Pukehangi Heights Development Area Subdivision Performance Standards.</p> <p>Generally within other areas of the District, especially for sites within the Residential 1 Zone where a subdivision application complies with the relevant zone and subdivision performance standards, the application is considered as a Controlled Activity.</p> <p>It is understood that the Restricted Discretionary rule was adopted largely because Council are concerned that there could be too much uncertainty over the potential outcomes from a design, hazards, servicing and cultural/heritage perspective to justify a controlled activity status (which cannot be declined).</p> <p>As discussed in the joint submission made by the Hunt Family, TAGH and Paul Sumner, a significant amount of this uncertainty relates to the provision of adequate infrastructure and servicing, particularly in terms of storm water management and the provision of storm water infrastructure.</p> <p>It is the Hunt Family's view that for the future urban growth aspirations of the Pukehangi Heights Structure Plan Area to be fully realised in the most efficient and effective way this uncertainty needs to be removed or reduced. This can in part be achieved by completing the modelling of the Utuhina catchment and associated planning, which has already begun, ideally in parallel to this plan change process.</p> <p>At present, given the current uncertainty regarding storm water management the proposed plan change sets a somewhat precautionary Restricted Discretionary Activity status for subdivision alongside provisions which require a catchment based Storm water Management Plan (SMP) to be prepared prior to subdivision and development occurring.</p> <p>The Hunt Family are of the opinion that should the current level of uncertainty be significantly reduced or removed by completing catchment modelling for the Utuhina and finalising a storm water management plan or system for the Pukehangi Heights Development Area in parallel with the Plan Change that a Controlled Activity rule for subdivision within the development area would be appropriate.</p>   | The Hunt Family seek a Controlled Activity status for future subdivision activities within the Pukehangi Heights Development Area.   |
| 26.1        | The Hunt Family  | Residential and Rural Residential Zones     | Supports in principle | Proposed Plan Provisions        | <p>It is acknowledged that storm water management, infrastructure and servicing are not the only areas where Council has identified that uncertainty exists. As mentioned above, Council also identified uncertainty over potential outcomes for design, hazards and cultural/heritage issues as additional reasons why a Restricted Discretionary activity status for subdivision is considered appropriate. However, it is the Hunt Family's view that PPC2 contains a very strong set of performance standards which clearly set the information requirements and expectations for any future subdivision and development within the Pukehangi Heights Development Area. In regards to design for example performance standard A5.2.3.4.2 (Minimum Lot Width for Solar Access) and A5.2.3.4 (Protection of Landscape Values in Escarpment Transition Areas 1 and 2) set very clear standards in terms of information requirements. Failure to achieve these standards would result in any subdivision application being considered as a Discretionary Activity. Performance Standard A5.2.3.4 requires a Landscape and Visual Assessment to be provided for subdivision in Escarpment Transition Areas 1 and 2, prepared by a suitably qualified landscape architect, and in doing so addresses uncertainty in terms of design outcomes. For subdivision within the proposed Rural 2 Zone of the Pukehangi Heights Development Area, the Plan Change provisions are more specific in terms of design performance standards.</p> <p>Performance Standard A5.2.4.4.1 sets a specific minimum average area for lots in the mid-site escarpment. Performance Standard A5.2.4.4.2 also requires each new lot in the Rural 2 Zone area to show the location of a suitable building platform of at least 200m2 and the alignment of future access. Furthermore, performance standard A5.2.4.4.3 also applies to all subdivisions within the Rural 2 Zone area and requires a landscape concept plan and visual assessment to be provided by a suitably qualified landscape architect to demonstrate how the objectives and policies for the maintenance and enhancement of landscape values will be met, including but not limited to the consideration of building locations, built form, ancillary structures, earthworks, vegetation, access and lighting. The following details will also be required as a condition of consent for any subdivision undertaken within the Rural 2 Zone area: A planting schedule; A planting programme; A post-planting maintenance regime including a pest plant and pest animal management programme; and Ownership and management systems to enable the planting programme and maintenance regime to be undertaken in an on-going manner. The Hunt Family are of the opinion these performance standards provide a high degree of certainty in terms of design outcomes for the Pukehangi Heights Development Area, particularly for future development within the Rural 2 Zone / mid-site escarpment area, located on the more visually prominent areas of the site. The above performance standards which have been referenced are specific to subdivision only. See submission for more re: land use performance standards.</p> |  |
| 26.2        | The Hunt Family  | Residential and Rural Residential Zones     | Support in part       | A5.2.3                          | <p>In terms of the proposed activity status for subdivision activities in the Pukehangi Heights Development Area Residential 1 Zone; the Hunt Family are of the view that subdivision activities, which are currently proposed to be classified as restricted discretionary activities, could be classified as controlled activities (e.g. subdivision). This 'shift' in activity status from restricted discretionary to controlled would be better enabled through the provision of more certainty in relation to key resource management issues, such as the provision of adequate storm water infrastructure and the addition of a section 'matters of control' which are aligned with and support the performance standards listed in A5.2. 3.4</p>  | Review restricted activity status for subdivision and consider a 'shift' from restricted discretionary to controlled; review any subsequent plan provisions (as required) (e.g. Rule A.5.2.3.1(9), A5.2.6 – restricted discretionary activities: method of assessment and replace with matters of control. |
| 26.3        | The Hunt Family  | Residential and Rural Residential Zones     | Support in part       | A5.2.4                          | <p>In terms of the proposed activity status for subdivision activities in the Pukehangi Heights Development Area Residential 1 Zone; the Hunt Family are of the view that subdivision activities, which are currently proposed to be classified as restricted discretionary activities, could be classified as controlled activities (e.g. subdivision). This 'shift' in activity status from restricted discretionary to controlled would be better enabled through the provision of more certainty in relation to key resource management issues, such as the provision of adequate storm water infrastructure and the addition of a section 'matters of control' which are aligned with and support the performance standards listed in A5.2. 3.4</p>  | Review restricted activity status for subdivision and consider a 'shift' from restricted discretionary to controlled; review any subsequent plan provisions (as required) (e.g. Rule A.5.2.4.1(6), A5.2.6 – restricted discretionary activities: method of assessment and replace with matters of control. |
| 27.0        | Wayne Derrick    | Appropriateness of Zones and Structure Plan | Oppose                | Whole plan change               | Submitter provides a background on the Parklands Estate and design context.   | The decision sought by this submitter is that Pukehangi Heights Plan Change 2 be withdrawn. In the alternative the submission may be satisfied by a decision that satisfactorily addresses the detailed areas of concern raised in this submission.  |

SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name  | Topic                                       | Support / Oppose                                       | Provision                                      | Reasons   | Decision Sought   |
|-------------|---|---|--|--|---|---|
| 27.1        | Wayne Derrick   | Landscape and Ecological Values             | Oppose   | Inconsistency with Parklands                   | Parklands is located in the same landscape as the Plan Change 2 area. However the approach taken in respecting that landscape is starkly different. This is illustrated by the table in the submission (pgs 2 - 3) which compares standards that are designed to maintain landscape quality and amenity. The plan change documentation does not clearly explain the above inconsistencies introduced by Plan Change 2, having regard to the same fundamental landscape features that apply across the Parklands and Plan Change 2 areas.<br>In this respect, the October 2012 Rotorua Caldera Rim Rural Character Design Guideline referred to in the Plan Change clearly envisages a rural, or at least rural-compatible outcome for development in this area. Parklands has achieved that aim. Plan Change 2 clearly does not – it is a substantially residential (and in parts medium density residential) plan change. The Boffa Miskell analysis of Plan Change 2 appears to rely significantly on this area's previous identification as a "Future Growth Area". This is an inadequate basis on which to consider the proposed density and location of development to be appropriate, having regard to the historically recognised landscape / character values that have led to the much more conservative controls applying at Parklands. The Boffa Miskell report concludes (without detailed analysis) that adverse landscape effects on this area (including Parklands) will be "low to moderate". The submitter disagrees. The landscape / character outcomes for the Plan Change 2 area will result in a high landscape change and contrast with Parklands, that change having high adverse effects on the consistency of the landscape, including its currently rural character. In relation to visual effects, the Boffa Miskell report expresses the view that the proposal is consistent with existing development patterns along the mid-slopes of the caldera. That is clearly not the case when compared to Parklands, which is in the middle of the plan change area. The Plan Change 2 provisions will not, as the Boffa Miskell report states, suitably integrate the area into the existing environment. The adverse visual effects will clearly be high. It is for these fundamental reasons that the submitter opposes the Residential 1 and associated provisions of the Plan Change. If there is to be a change at all that change will need to be consistent with, or complementary to, the (Parklands) development framework already part of the district plan. A different approach is necessary, including controls (including development densities) that reflect those applying to Parklands. | Pukehangi Heights Plan Change 2 be withdrawn. In the alternative the submission may be satisfied by a decision that satisfactorily addresses the detailed areas of concern raised in this submission.   |
| 27.2        | Wayne Derrick   | Appropriateness of Zones and Structure Plan | Oppose   | Structure Plan                                 | The structure plan shows a primary road and walkway immediately adjoining Parklands (and the submitter's site) alongside the north western boundary of Area B. These infrastructure elements are opposed on the basis that they will bring intensive activity close to that boundary, without an adequate buffer for amenity and security reasons. Should the Plan Change proceed the submitter seeks that the walkway and primary road be deleted. In the very least the submitter considers it essential that there be at least a 50m separation between any road or walkway and the common boundary with Parklands. That buffer should be planted out with trees, consistent with those already existing in this area.<br>The structure plan also shows a storm water / recreation area alongside the north western boundary in the Upper Terrace. It is not clear to the submitter why this location is necessary for storm water purposes. Regardless, there is no detail given as to what the "recreation" component of this area will involve. Given the passive use nature of this area currently it is not appropriate that there be potential for adverse effects arising from any active recreational use of the area. The "recreation" notation needs to be removed from the structure plan for this area.  | Pukehangi Heights Plan Change 2 be withdrawn. In the alternative the submission may be satisfied by a decision that satisfactorily addresses the detailed areas of concern raised in this submission.   |
| 28.0        | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | General                                     | Support - subject to appropriate 'checks and balances' | Strategic Planning for Urban Growth in Rotorua | The landowners concur that there is a need to provide an improved supply of land for housing; and that the Pukehangi Heights Development Area has the potential to accommodate a significant part of the projected future demand for housing in Rotorua. Please refer to the document for more.   |   |
| 28.1        | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Residential and Rural Residential Zones     |  | Proposed Plan Provisions                       | The landowners concur with the purpose behind PPC2; that being to enable residential development to occur within the Pukehangi Heights Development Area in a comprehensively planned and integrated manner.<br>The landowners generally agree with the proposed objectives, policies and place-specific principles, which seek to address landscape, urban design, cultural landscape and natural hazard risk management issues specific to the Pukehangi Heights Development area; and that supplement the general objectives and policies for the Residential 1 and Rural 2 (Rural Lifestyle) zones. The landowners agree with the establishment of a structure plan to guide future development of land in relation to:<br>▣ landscape management;<br>▣ urban design;<br>▣ protection and enhancement of cultural values;<br>▣ access and connectivity (including active transport modes); and<br>▣ storm water infrastructure.  |   |
| 28.10       | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Natural Hazards                             | Support in part  | Policy 3.1                                     | The landowners support in part Policy 3.1 (Flooding and Storm water) as proposed; the landowners note that RLC is in the process of renewing the comprehensive storm water discharge consents that it holds for the wider Utuhina catchment. To date, the application process has been approached on conservative design assumptions due to the lack of modelled data. Opportunities are being considered to enhance the discharge consent application process with modelled data and to widen the scope of the application to include the Pukehangi Heights Development Area. This will ensure that issues are addressed effectively and efficiently on a comprehensive basis across the catchment, thereby simplifying the future development consent process. The landowners are of the opinion that a comprehensive approach to storm water management should include an analysis of existing land area and infrastructure surrounding the proposed plan change area (e.g. Wright Park). The landowners are of the view; for the purpose of clarity and certainty – and as stated above, to simplify any future development consent process; that catchment modelling and associated planning be completed parallel to this plan change process. This will enable plan provisions for the Pukehangi Heights Development Area to be drafted based on the most up to date information; and will provide additional certainty for the development of the Pukehangi Heights Development Area and ensure that any potential environmental effects are managed effectively and efficiently on a comprehensive basis across the Utuhina catchment.   | Review proposed wording for Policy 3.1 (Flooding and Storm water) subsequent to the completion of catchment modelling and associated planning to ensure purpose and intent of policy framework is effective and efficient.  |
| 28.11       | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Subdivision                                 | Support in part  | A5.2.3   | In terms of the proposed activity status for activities in the Pukehangi Heights Development Area Residential 1 and Rural 2 Zones; the landowners are of the view that certain activities, which are currently proposed to be classified as restricted discretionary activities, could be classified as controlled activities (e.g. subdivision). This 'shift' in activity status from restricted discretionary to controlled would be better enabled through the provision of more certainty in relation to key resource management issues, such as the provision of adequate storm water infrastructure.  | Review restricted activity status for certain activities (e.g. subdivision) and consider a 'shift' from restricted discretionary to controlled; review any subsequent plan provisions (as required) (e.g. A5.2.6 – restricted discretionary activities: method of assessment ...) |
| 28.12       | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Subdivision                                 | Support in part  | A5.2.3   | The landowners support in part the rule framework under A5.2.3 (Residential 1 Zone); however seek the ability to be able to subdivide off development areas or blocks from the parent site to enable and facilitate development. For example, by subdividing a 5-10ha block from the parent site to then be on-sold to a developer without the need to provide detailed technical reports and assessments.  | That a rule/provisions be introduced under A5.2.3 to provide for 'pre-intensification' subdivisions without the need to provide detailed technical reports and assessments.   |
| 28.13       | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Residential Design, layout and appearance   | Support  | A5.2.3.3                                       | The landowners support the proposed performance standards for land use activities.  | Retain performance standards for land use activities as proposed.   |
| 28.14       | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Subdivision                                 | Support in part  | A5.2.3.4                                       | The landowners support the proposed performance standards for subdivision; except for A5.2.3.4(7) (Storm water Management) and A5.2.3.4 (12) (Construction Traffic) (refer below)   | Retain performance standards for land use activities as proposed; except for A5.2.3.4(7) (Storm water Management) and A5.2.3.4 (12) (Construction Traffic) (refer below)  |
| 28.15       | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Subdivision                                 | Support in part  | A5.2.3.4                                       | The landowners support the proposed performance standards for subdivision except for those mentioned elsewhere in this submission. However, the landowners are also concerned that there is no defined scope or threshold as to when detailed technical reports and assessment as referred to in A5.2.3.4(4) (Protection and Landscape Values), A5.2.3.4(7) (Storm water Management), A5.2.3.4(8) (Natural Hazard Risk Management) and A5.2.3.4(12) (Construction Traffic) are or are not required.   | That a defined scope or threshold be provided as to when detailed technical reports and assessments (i.e. landscape and visual assessments, storm water management plans, traffic management plans) are required with subdivision applications.                                   |
| 28.16       | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Natural Hazards                             | Support in part  | A5.2.3.4 (7)                                   | The landowners support in part the proposed performance standard for storm water management; however, storm water management for future subdivision and land use activities within the Pukehangi Heights Development Area should be guided and informed by the completion of catchment modelling and associated planning; this will provide for more certainty and a sustainable use of the land resource.  | Review proposed wording for A5.2.3.4 (Storm water Management) subsequent to the completion of catchment modelling and associated planning to ensure certainty and a sustainable use of the land resource.   |

SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name  | Topic                                   | Support / Oppose | Provision                        | Reasons   | Decision Sought   |
|-------------|---|---|------------------|----------------------------------|---|---|
| 28.17       | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Construction Effects                    | Support in part  | A5.2.3.4 (12)                    | <p>TAGH has taken expert traffic engineering advice. As a consequence of this advice, the landowners are of the view that Matipo Ave is still a valid option for construction traffic and should be retained as an option for such in the future; particularly given that the Hunt Farm ('Area B') to the northwest is held in private ownership and that Great West Road, while providing legal access to 'Area A', would result in significant environmental effects, primarily due to earthworks incidental to the construction of a temporary access road.</p>  | <p>A5.2.3.4 (12) to be revised with amended wording as follows:<br/>For the subdivision and development of Area A, construction traffic shall gain access via either:<br/>(a) Area B from Pukehangi Road;<br/>(b) Matipo Avenue; or<br/>(c) An access road from Great West Road.<br/>A Construction Traffic Management Plan shall be submitted, which shall include (but not be limited to):<br/>▯ Pavement rehabilitation conditions and monitoring<br/>▯ Temporary speed limits<br/>▯ Parking restrictions<br/>▯ Hours of operation<br/>▯ Details of truck wash facilities<br/>▯ Application of turning restrictions and truck routes<br/>To avoid doubt, "construction traffic" means heavy and light vehicles associated with subdivision and development, including but not limited to earthworks and the construction of infrastructure, but does not include traffic associated with construction of residential buildings and structures in the Development Area.</p> |
| 28.18       | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Subdivision                             | Support in part  | A5.2.4                           | <p>The landowners support in part the rule framework under A5.2.4 (Rural 2 Zone); however seek the ability to be able to subdivide off development areas or blocks from the parent site to enable and facilitate development. For example, by subdividing a 5-10ha block from the parent site to then be on-sold to a developer without the need to provide detailed technical reports and assessments.</p>   | <p>That a rule/provisions be introduced under A5.2.4 to provide for 'pre-intensification' subdivisions without the need to provide detailed technical reports and assessments</p>   |
| 28.19       | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Subdivision                             | Support in part  | A5.2.4.4                         | <p>The landowners support the proposed performance standards for subdivision except for those mentioned elsewhere in this submission. However, the landowners are also concerned that there is no defined scope or threshold as to when detailed technical reports and assessments as referred to in A5.2.4.4(3) (Landscape Concept Plan and Visual Assessment), A5.2.4.4(4) (Storm water Management), A5.2.4.4(5) (Natural Hazard Risk Management) and A5.2.4.4(8) (Construction Traffic) are or are not required.</p>   | <p>That a defined scope or threshold be provided as to when detailed technical reports and assessments (i.e. landscape and visual assessments, storm water management plans, traffic management plans) are required with subdivision applications.</p>  |
| 28.2        | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Residential and Rural Residential Zones |                  | Activity Status                  | <p>In terms of the proposed activity status for activities in the Pukehangi Heights Development Area Residential 1 and Rural 2 Zones; the Landowners are of the view that certain activities, which are currently proposed to be classified as restricted discretionary activities, should be classified as controlled activities. This 'shift' in activity status from restricted discretionary to controlled would provide greater certainty for the development of the Pukehangi Heights Development Area. The Landowners note that this change in activity status could be better enabled through the provision of more certainty in relation to key resource management issues, such as the provision of adequate storm water infrastructure (refer to submission).</p>  |   |
| 28.3        | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Subdivision                             |                  | Subdivision Activity Status      | <p>The landowners seek a controlled activity status for future subdivision activities within the Pukehangi Heights Development Area. The question as to whether a controlled activity status for subdivision within the Pukehangi Heights Development Area is appropriate is largely one of certainty. In other words, how much certainty will a controlled activity status provide in terms of achieving the desired outcomes for development within the Pukehangi Heights Development Area?</p> <p>The Plan Change was notified with a restricted discretionary activity status that would apply to any subdivision application that is consistent with the principles of the Structure Plan for the Pukehangi Heights Development Area and that complies with the Pukehangi Heights Development Area Subdivision Performance Standards.</p> <p>Generally, within other areas of the District, especially for sites within the Residential 1 Zone and for subdivision that complies with the relevant zone and subdivision performance standards, subdivision is classified as a controlled activity.</p> <p>It is understood that the restricted discretionary activity status was adopted largely because RLC are concerned that there could be too much uncertainty over potential outcomes from a design, natural hazard and servicing perspective to justify a controlled activity status (which cannot be declined). As discussed below (refer Infrastructure (Storm water)) a significant amount of this uncertainty relates to the provision of adequate infrastructure and servicing, particularly in terms of storm water management and the provision of storm water infrastructure.</p> <p>The landowners are of the view that for the future urban growth aspirations of the Pukehangi Heights Structure Plan Area to be fully realised in the most efficient and effective way this uncertainty needs to be removed or reduced. This can in part be achieved by completing the modelling of the Utuhina catchment and associated planning; ideally in parallel to this plan change process.</p> <p>At present, given the current uncertainty regarding storm water management the proposed plan change sets a somewhat precautionary restricted discretionary activity status for subdivision alongside provisions which require a catchment-based Storm water Management Plan (SMP) to be prepared prior to subdivision and development occurring. The landowners are of the opinion that should the current level of uncertainty be significantly reduced or removed by completing catchment modelling for the Utuhina and finalising a storm water management plan or system for the Pukehangi Heights Development Area in parallel with the Plan Change that a controlled activity status for subdivision within the development area would be appropriate.</p> |   |
| 28.4        | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Subdivision                             |                  | Pre-Intensification Subdivisions | <p>The landowners seek the ability to be able to subdivide off development areas or blocks from the parent site to enable and facilitate development. For example, by subdividing a 5-10ha block from the parent site to then be on-sold to a developer. At present the proposed provisions do not provide for such 'pre-intensification' subdivisions to occur in a simple and efficient manner. For example, the proposed performance standards require a Landscape and Visual Assessment to be provided for any subdivision in Escarpment Transition Areas 1 and 2, by a suitably qualified landscape architect.</p> <p>Furthermore, any subdivision application must provide a Storm water Management Plan (SMP) in accordance with performance standards A5.2.3.4.7 &amp; A5.2.3.5.4, a Natural Hazard Risk Assessment that complies with Regional Policy Statement Appendix L – Methodology for Risk Assessment and a Traffic Management Plan for any subdivision within Area A, as well as a Noise and Vibration Management Plan. Within the proposed Rural 2 Zone area of the site, as well as the above-mentioned requirements, each subdivision application is required to provide a Landscape Concept Plan and Visual Assessment. There are concerns that requiring an SMP for each and every subdivision (regardless of scale) may also result in ad-hoc or unintended outcomes. For example, how would RLC propose to ensure that the management of storm water from one subdivision will adequately or efficiently integrate into and have regard to other stages in order to address the issue holistically over the whole of the structure plan area?</p> <p>At present there is no threshold or scale as to when these additional supporting reports or assessments should or should not be required. Arguably, for a subdivision which is intended to 'break-up' the parent site into manageable areas for sale to developers the detailed technical reports and assessments should not be required. There is the potential that such 'pre-intensification' subdivisions could be considered inconsistent with the place-specific principles of the structure plan for the Pukehangi Heights Development Area. This would result in the subdivision being considered a discretionary activity. Consideration should be given to an amendment of the principles to provide for pre-intensification subdivision.</p>  | <p>The landowners recommend that a defined scope be put around when additional technical reports and assessments are required. Otherwise, based on the provisions as proposed future small-scale subdivisions (i.e. 2-5 lots) or 'pre-intensification' subdivisions will be required to provide such detail and assessments. The landowners also request that specific provisions be included to allow for 'pre-intensification' subdivisions as discussed above.</p>   |

SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name  | Topic                                       | Support / Oppose | Provision                    | Reasons   | Decision Sought  |
|-------------|---|---|------------------|------------------------------|---|--|
| 28.5        | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Natural Hazards                             |                  | Storm water                  | <p>The provision of adequate infrastructure and servicing is key resource management issue for any urban growth area; and in this case critical to the future urban growth aspirations within the Pukehangi Heights Development Area. Currently, there is a level of uncertainty; particularly in relation to the provision of storm water infrastructure, not only for the Pukehangi Heights Structure Plan Area, but the wider environment. The landowners agree that finalising a storm water management system for the development is constrained by incomplete information on the Utuhina catchment. An effective Catchment Management Plan (CMP) for the total catchment requires modelling that will enable a consideration of issues such as future development, current flooding risk, and climate change. The landowners note that this work is underway, but not yet complete. The landowners are of the opinion that a comprehensive approach to storm water management should include an analysis of existing land area and infrastructure surrounding the proposed plan change area (e.g. Wright Park).</p> <p>Development planning for the Pukehangi Heights Development Area has proceeded using interim assumptions about the level of attenuation to protect the proposed development and downstream areas from flooding. The preliminary design criteria set for storm water management is to reduce the 1% AEP runoff to 80% of the pre-development flows. This results in large areas that need to be set aside within the development area for storm water detention basins. These areas will eventually vest with RLC. The extent of on-site storm water mitigation and the ultimate development yield cannot be fully confirmed until the catchment modelling and planning work is complete. Given these uncertainties, the proposed plan change provisions require a catchment-based Storm water Management Plan (SMP) to be prepared prior to subdivision and development occurring. The issues to be addressed in the SMP are set out on the Performance Standards. This includes the need to address the potential effects of storm water management measures, for example, the detention areas, on land stability and liquefaction; developers will also need storm water discharge consents from the Bay of Plenty Regional Council (BOPRC) to enable development to occur. This will require an assessment of water quality and quantity effects to be undertaken, and consideration of potentially affected persons. The landowners note that RLC is in the process of renewing the comprehensive storm water discharge consents that it holds for the wider Utuhina catchment. To date, the application process has been approached on conservative design assumptions due to the lack of modelled data. Opportunities are being considered to enhance the discharge consent application process with modelled data and to widen the scope of the application to include the Pukehangi Heights Development Area. This will ensure that issues are addressed effectively and efficiently on a comprehensive basis across the catchment, thereby simplifying the future development consent process.</p> | <p>The landowners are of the view; for the purpose of clarity and certainty – and as stated above, to simplify any future development consent process; that catchment modelling and associated planning be completed parallel to this plan change process.</p> <p>This will enable plan provisions for the Pukehangi Heights Development Area to be drafted based on the most up to date information; and will provide additional certainty for the development of the Pukehangi Heights Development Area and ensure that any potential environmental effects are managed effectively and efficiently on a comprehensive basis across the Utuhina catchment.</p> |
| 28.7        | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Construction Effects                        |                  | Construction Traffic         | <p>TAGH has taken expert traffic engineering advice. As a consequence of this advice, the landowners are of the view that Matipo Ave is still a valid option for construction traffic and should be retained as an option for such in the future; particularly given that the Hunt Farm ('Area B') to the northwest is held in private ownership and that Great West Road, while providing legal access to 'Area A', would result in significant environmental effects, primarily due to earthworks involved in the construction of a temporary access road.</p> <p>Overall, the landowners support the proposed plan provisions insofar as transportation issues are concerned; except for construction traffic provisions. Subject to the amendments sought in relation to construction traffic; the transportation provisions will provide for a range of options in the future for both (a) construction traffic and (b) traffic generation as a result of completed development.</p>   |  |
| 28.8        | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Residential and Rural Residential Zones     | Support in part  | A5.2A.1                      | <p>The landowners support the identification of the Pukehangi Heights Development Area as an appropriate area for urban growth, and the place-specific principles proposed. Consideration should be given to an amendment of the principles to provide for pre-intensification subdivision.</p>   | <p>Retain 'introduction' as proposed for the Pukehangi Heights Development Area. Consideration should be given to an amendment of the principles to provide for pre-intensification subdivision.</p>   |
| 28.9        | Joint Submitters:- The Hunt Family, Te Arawa Group Holdings Limited, Paul Sumner (Sunny Downs Farm) | Residential and Rural Residential Zones     | Support in part  | A5.2A.2                      | <p>The landowners support the proposed objectives and supporting policies for the Pukehangi Heights Development Area; except for Policy 3.1 (Flooding and Storm water) (refer below)</p>  | <p>Retain proposed objectives and supporting policies as proposed; except for Policy 3.1 (Flooding and Storm water) (refer below)</p>  |
| 29.0        | Layne Harvey  | Appropriateness of Zones and Structure Plan | Oppose           | Whole plan change            | <p>Submitter provides a background on the Parklands Estate and design context.</p>  | <p>The decision sought by this submitter is that Pukehangi Heights Plan Change 2 be withdrawn. In the alternative the submission may be satisfied by a decision that satisfactorily addresses the detailed areas of concern raised in this submission.</p>   |
| 29.1        | Layne Harvey  | Landscape and Ecological Values             | Oppose           | Inconsistency with Parklands | <p>Parklands is located in the same landscape as the Plan Change 2 area. However the approach taken in respecting that landscape is starkly different. This is illustrated by the table in the submission (pgs 2 - 3) which compares standards that are designed to maintain landscape quality and amenity. The plan change documentation does not clearly explain the above inconsistencies introduced by Plan Change 2, having regard to the same fundamental landscape features that apply across the Parklands and Plan Change 2 areas.</p> <p>In this respect, the October 2012 Rotorua Caldera Rim Rural Character Design Guideline referred to in the Plan Change clearly envisages a rural, or at least rural-compatible outcome for development in this area. Parklands has achieved that aim. Plan Change 2 clearly does not – it is a substantially residential (and in parts medium density residential) plan change. The Boffa Miskell analysis of Plan Change 2 appears to rely significantly on this area's previous identification as a "Future Growth Area". This is an inadequate basis on which to consider the proposed density and location of development to be appropriate, having regard to the historically recognised landscape / character values that have led to the much more conservative controls applying at Parklands. The Boffa Miskell report concludes (without detailed analysis) that adverse landscape effects on this area (including Parklands) will be "low to moderate". The submitter disagrees. The landscape / character outcomes for the Plan Change 2 area will result in a high landscape change and contrast with Parklands, that change having high adverse effects on the consistency of the landscape, including its currently rural character. In relation to visual effects, the Boffa Miskell report expresses the view that the proposal is consistent with existing development patterns along the mid-slopes of the caldera. That is clearly not the case when compared to Parklands, which is in the middle of the plan change area. The Plan Change 2 provisions will not, as the Boffa Miskell report states, suitably integrate the area into the existing environment. The adverse visual effects will clearly be high. It is for these fundamental reasons that the submitter opposes the Residential 1 and associated provisions of the Plan Change. If there is to be a change at all that change will need to be consistent with, or complementary to, the (Parklands) development framework already part of the district plan. A different approach is necessary, including controls (including development densities) that reflect those applying to Parklands.</p>  | <p>Pukehangi Heights Plan Change 2 be withdrawn. In the alternative the submission may be satisfied by a decision that satisfactorily addresses the detailed areas of concern raised in this submission.</p>   |
| 29.2        | Layne Harvey  | Appropriateness of Zones and Structure Plan | Oppose           | Structure Plan               | <p>The structure plan shows a primary road and walkway immediately adjoining Parklands (and the submitter's site) alongside the north western boundary of Area B. These infrastructure elements are opposed on the basis that they will bring intensive activity close to that boundary, without an adequate buffer for amenity and security reasons. Should the Plan Change proceed the submitter seeks that the walkway and primary road be deleted. In the very least the submitter considers it essential that there be at least a 50m separation between any road or walkway and the common boundary with Parklands. That buffer should be planted out with trees, consistent with those already existing in this area.</p> <p>The structure plan also shows a storm water / recreation area alongside the north western boundary in the Upper Terrace. It is not clear to the submitter why this location is necessary for storm water purposes. Regardless, there is no detail given as to what the "recreation" component of this area will involve. Given the passive use nature of this area currently it is not appropriate that there be potential for adverse effects arising from any active recreational use of the area. The "recreation" notation needs to be removed from the structure plan for this area.</p>   | <p>Pukehangi Heights Plan Change 2 be withdrawn. In the alternative the submission may be satisfied by a decision that satisfactorily addresses the detailed areas of concern raised in this submission.</p>   |
| 30.0        | Mazen Shasha  | Appropriateness of Zones and Structure Plan | Oppose           | Whole plan change            | <p>Submitter provides a background on the Parklands Estate and design context.</p>  | <p>The decision sought by this submitter is that Pukehangi Heights Plan Change 2 be withdrawn. In the alternative the submission may be satisfied by a decision that satisfactorily addresses the detailed areas of concern raised in this submission.</p>   |



SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name                         | Topic                                       | Support / Oppose | Provision                    | Reasons   | Decision Sought   |
|-------------|--|---|------------------|------------------------------|---|---|
| 30.1        | Mazen Shasha                           | Landscape and Ecological Values             | Oppose           | Inconsistency with Parklands | Parklands is located in the same landscape as the Plan Change 2 area. However the approach taken in respecting that landscape is starkly different. This is illustrated by the table in the submission (pgs 2 - 3) which compares standards that are designed to maintain landscape quality and amenity. The plan change documentation does not clearly explain the above inconsistencies introduced by Plan Change 2, having regard to the same fundamental landscape features that apply across the Parklands and Plan Change 2 areas.<br>In this respect, the October 2012 Rotorua Caldera Rim Rural Character Design Guideline referred to in the Plan Change clearly envisages a rural, or at least rural-compatible outcome for development in this area. Parklands has achieved that aim. Plan Change 2 clearly does not – it is a substantially residential (and in parts medium density residential) plan change. The Boffa Miskell analysis of Plan Change 2 appears to rely significantly on this area's previous identification as a "Future Growth Area". This is an inadequate basis on which to consider the proposed density and location of development to be appropriate, having regard to the historically recognised landscape / character values that have led to the much more conservative controls applying at Parklands. The Boffa Miskell report concludes (without detailed analysis) that adverse landscape effects on this area (including Parklands) will be "low to moderate". The submitter disagrees. The landscape / character outcomes for the Plan Change 2 area will result in a high landscape change and contrast with Parklands, that change having high adverse effects on the consistency of the landscape, including its currently rural character. In relation to visual effects, the Boffa Miskell report expresses the view that the proposal is consistent with existing development patterns along the mid-slopes of the caldera. That is clearly not the case when compared to Parklands, which is in the middle of the plan change area. The Plan Change 2 provisions will not, as the Boffa Miskell report states, suitably integrate the area into the existing environment. The adverse visual effects will clearly be high. It is for these fundamental reasons that the submitter opposes the Residential 1 and associated provisions of the Plan Change. If there is to be a change at all that change will need to be consistent with, or complementary to, the (Parklands) development framework already part of the district plan. A different approach is necessary, including controls (including development densities) that reflect those applying to Parklands. | Pukehangi Heights Plan Change 2 be withdrawn. In the alternative the submission may be satisfied by a decision that satisfactorily addresses the detailed areas of concern raised in this submission.   |
| 30.2        | Mazen Shasha                           | Appropriateness of Zones and Structure Plan | Oppose           | Structure Plan               | The structure plan shows a primary road and walkway immediately adjoining Parklands (and the submitter's site) alongside the north western boundary of Area B. These infrastructure elements are opposed on the basis that they will bring intensive activity close to that boundary, without an adequate buffer for amenity and security reasons. Should the Plan Change proceed the submitter seeks that the walkway and primary road be deleted. In the very least the submitter considers it essential that there be at least a 50m separation between any road or walkway and the common boundary with Parklands. That buffer should be planted out with trees, consistent with those already existing in this area.<br>The structure plan also shows a storm water / recreation area alongside the north western boundary in the Upper Terrace. It is not clear to the submitter why this location is necessary for storm water purposes. Regardless, there is no detail given as to what the "recreation" component of this area will involve. Given the passive use nature of this area currently it is not appropriate that there be potential for adverse effects arising from any active recreational use of the area. The "recreation" notation needs to be removed from the structure plan for this area.  | Pukehangi Heights Plan Change 2 be withdrawn. In the alternative the submission may be satisfied by a decision that satisfactorily addresses the detailed areas of concern raised in this submission.   |
| 31.0        | Karen Johnston - Johnston Family Trust | Appropriateness of Zones and Structure Plan | Oppose           | Whole plan change            | Submitter provides a background on the Parklands Estate and design context.   | The decision sought by this submitter is that Pukehangi Heights Plan Change 2 be withdrawn. In the alternative the submission may be satisfied by a decision that satisfactorily addresses the detailed areas of concern raised in this submission. |
| 31.1        | Karen Johnston - Johnston Family Trust | Landscape and Ecological Values             | Oppose           | Inconsistency with Parklands | Parklands is located in the same landscape as the Plan Change 2 area. However the approach taken in respecting that landscape is starkly different. This is illustrated by the table in the submission (pgs 2 - 3) which compares standards that are designed to maintain landscape quality and amenity. The plan change documentation does not clearly explain the above inconsistencies introduced by Plan Change 2, having regard to the same fundamental landscape features that apply across the Parklands and Plan Change 2 areas.<br>In this respect, the October 2012 Rotorua Caldera Rim Rural Character Design Guideline referred to in the Plan Change clearly envisages a rural, or at least rural-compatible outcome for development in this area. Parklands has achieved that aim. Plan Change 2 clearly does not – it is a substantially residential (and in parts medium density residential) plan change. The Boffa Miskell analysis of Plan Change 2 appears to rely significantly on this area's previous identification as a "Future Growth Area". This is an inadequate basis on which to consider the proposed density and location of development to be appropriate, having regard to the historically recognised landscape / character values that have led to the much more conservative controls applying at Parklands. The Boffa Miskell report concludes (without detailed analysis) that adverse landscape effects on this area (including Parklands) will be "low to moderate". The submitter disagrees. The landscape / character outcomes for the Plan Change 2 area will result in a high landscape change and contrast with Parklands, that change having high adverse effects on the consistency of the landscape, including its currently rural character. In relation to visual effects, the Boffa Miskell report expresses the view that the proposal is consistent with existing development patterns along the mid-slopes of the caldera. That is clearly not the case when compared to Parklands, which is in the middle of the plan change area. The Plan Change 2 provisions will not, as the Boffa Miskell report states, suitably integrate the area into the existing environment. The adverse visual effects will clearly be high. It is for these fundamental reasons that the submitter opposes the Residential 1 and associated provisions of the Plan Change. If there is to be a change at all that change will need to be consistent with, or complementary to, the (Parklands) development framework already part of the district plan. A different approach is necessary, including controls (including development densities) that reflect those applying to Parklands. | Pukehangi Heights Plan Change 2 be withdrawn. In the alternative the submission may be satisfied by a decision that satisfactorily addresses the detailed areas of concern raised in this submission.   |
| 31.2        | Karen Johnston - Johnston Family Trust | Appropriateness of Zones and Structure Plan |                  | Structure Plan               | The structure plan shows a primary road and walkway immediately adjoining Parklands (and the submitter's site) alongside the north western boundary of Area B. These infrastructure elements are opposed on the basis that they will bring intensive activity close to that boundary, without an adequate buffer for amenity and security reasons. Should the Plan Change proceed the submitter seeks that the walkway and primary road be deleted. In the very least the submitter considers it essential that there be at least a 50m separation between any road or walkway and the common boundary with Parklands. That buffer should be planted out with trees, consistent with those already existing in this area.<br>The structure plan also shows a storm water / recreation area alongside the north western boundary in the Upper Terrace. It is not clear to the submitter why this location is necessary for storm water purposes. Regardless, there is no detail given as to what the "recreation" component of this area will involve. Given the passive use nature of this area currently it is not appropriate that there be potential for adverse effects arising from any active recreational use of the area. The "recreation" notation needs to be removed from the structure plan for this area.  | Pukehangi Heights Plan Change 2 be withdrawn. In the alternative the submission may be satisfied by a decision that satisfactorily addresses the detailed areas of concern raised in this submission.   |
| 32.0        | Daniel Timothy Bryce Storey            | Natural Hazards                             | Oppose           | Storm water and Flooding     | I believe that the plans for Pukehangi Heights severely underestimate the very large volume of water that runs down Hunts farm when it rains especially in storms. We are therefore scared of being flooded out and having our house ruined. Currently the natural gullies and underground streams take care of this water but the extreme landscaping changes necessary for houses and the large areas covered in buildings and concrete etc. will cause flooding and damage to all the properties and homes across from the development. We also feel that the council has not taken into account the effects of global warming and the increase in severe weather events which will increase the amount of water impacting the surrounding area which will no longer be able to be contained by the current natural environment.   | NOT to go ahead with the Pukehangi Heights development  |
| 32.1        | Daniel Timothy Bryce Storey            | Construction Effects                        | Oppose           | Dust and health effects      | We are also concerned about other adverse health effects from the construction. Due to extra dust and dirt from the construction we believe this will have an adverse effect on our child that has asthma impacting on his standard of living.  | NOT to go ahead with the Pukehangi Heights development  |
| 32.2        | Daniel Timothy Bryce Storey            | Construction Effects                        | Oppose           | Vibration                    | Due to the geological stability of the land in its present form and the road construction equipment and works and the structural damage it will cause to our home and property. Our home is already rattled and shaken when a heavy truck occasionally goes past. We therefore do not wish to have structural damage from the large volume of heavy trucks etc. all day every day while the work is carried out over a sustained period.  | NOT to go ahead with the Pukehangi Heights development  |
| 32.3        | Daniel Timothy Bryce Storey            | Transportation and the Road Network         | Oppose           | Road safety                  | We are concerned that the council has not adequately taken into account the impact on current residents and their ability to safely enter and leave our property and road as well as the safety of our children due to the increased traffic flow along Pukehangi Road not only during the construction but afterwards as well.   | NOT to go ahead with the Pukehangi Heights development  |
| 32.4        | Daniel Timothy Bryce Storey            | Three Waters                                | Oppose           | Water supply                 | We also feel that the council has not adequately taken into account the effect that this large volume of houses will have on the current fresh water supply in the immediate area, both on current residents and water table in the surrounding environment. Already during summer there are water pressure issues due to the increase in water demand and unless additional reservoirs are built there will be inadequate water supply levels resulting in an increase in health and safety issues due to water shortages which will result in an increased fire risk.   | NOT to go ahead with the Pukehangi Heights development  |
| 33.0        | Samuel Jack Neville Storey             | Natural Hazards                             | Oppose           | Storm water and Flooding     | I believe that the plans for Pukehangi Heights severely underestimate the very large volume of water that runs down Hunts farm when it rains especially in storms. We are therefore scared of being flooded out and having our house ruined. Currently the natural gullies and underground streams take care of this water but the extreme landscaping changes necessary for houses and the large areas covered in buildings and concrete etc. will cause flooding and damage to all the properties and homes across from the development. We also feel that the council has not taken into account the effects of global warming and the increase in severe weather events which will increase the amount of water impacting the surrounding area which will no longer be able to be contained by the current natural environment.   | NOT to go ahead with the Pukehangi Heights development  |



SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name                    | Topic                               | Support / Oppose | Provision                | Reasons   | Decision Sought   |
|-------------|-----------------------------------|-------------------------------------|------------------|--------------------------|---|---|
| 33.1        | Samuel Jack Neville Storey        | Construction Effects                | Oppose           | Dust and health effects  | We are also concerned about other adverse health effects from the construction. Due to extra dust and dirt from the construction we believe this will have an adverse effect on our child that has asthma impacting on his standard of living.  | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 33.2        | Samuel Jack Neville Storey        | Construction Effects                | Oppose           | Vibration                | Due to the geological stability of the land in its present form and the road construction equipment and works and the structural damage it will cause to our home and property. Our home is already rattled and shaken when a heavy truck occasionally goes past. We therefore do not wish to have structural damage from the large volume of heavy trucks etc. all day every day while the work is carried out over a sustained period.  | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 33.3        | Samuel Jack Neville Storey        | Transportation and the Road Network | Oppose           | Road safety              | We are concerned that the council has not adequately taken into account the impact on current residents and their ability to safely enter and leave our property and road as well as the safety of our children due to the increased traffic flow along Pukehangi Road not only during the construction but afterwards as well.   | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 33.4        | Samuel Jack Neville Storey        | Three Waters                        | Oppose           | Water supply             | We also feel that the council has not adequately taken into account the effect that this large volume of houses will have on the current fresh water supply in the immediate area, both on current residents and water table in the surrounding environment. Already during summer there are water pressure issues due to the increase in water demand and unless additional reservoirs are built there will be inadequate water supply levels resulting in an increase in health and safety issues due to water shortages which will result in an increased fire risk.   | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 34.0        | Valerie Edevine Susan Storey      | Natural Hazards                     | Oppose           | Storm water and Flooding | I believe that the plans for Pukehangi Heights severely underestimate the very large volume of water that runs down Hunts farm when it rains especially in storms. We are therefore scared of being flooded out and having our house ruined. Currently the natural gullies and underground streams take care of this water but the extreme landscaping changes necessary for houses and the large areas covered in buildings and concrete etc. will cause flooding and damage to all the properties and homes across from the development. We also feel that the council has not taken into account the effects of global warming and the increase in severe weather events which will increase the amount of water impacting the surrounding area which will no longer be able to be contained by the current natural environment. | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 34.1        | Valerie Edevine Susan Storey      | Construction Effects                | Oppose           | Dust and health effects  | We are also concerned about other adverse health effects from the construction. Due to extra dust and dirt from the construction we believe this will have an adverse effect on our child that has asthma impacting on his standard of living.  | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 34.2        | Valerie Edevine Susan Storey      | Construction Effects                | Oppose           | Vibration                | Due to the geological stability of the land in its present form and the road construction equipment and works and the structural damage it will cause to our home and property. Our home is already rattled and shaken when a heavy truck occasionally goes past. We therefore do not wish to have structural damage from the large volume of heavy trucks etc. all day every day while the work is carried out over a sustained period.  | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 34.3        | Valerie Edevine Susan Storey      | Transportation and the Road Network | Oppose           | Road safety              | We are concerned that the council has not adequately taken into account the impact on current residents and their ability to safely enter and leave our property and road as well as the safety of our children due to the increased traffic flow along Pukehangi Road not only during the construction but afterwards as well.   | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 34.4        | Valerie Edevine Susan Storey      | Three Waters                        | Oppose           | Water supply             | We also feel that the council has not adequately taken into account the effect that this large volume of houses will have on the current fresh water supply in the immediate area, both on current residents and water table in the surrounding environment. Already during summer there are water pressure issues due to the increase in water demand and unless additional reservoirs are built there will be inadequate water supply levels resulting in an increase in health and safety issues due to water shortages which will result in an increased fire risk.   | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 35.0        | Michael Victor Collingwood Storey | Natural Hazards                     | Oppose           | Storm water and Flooding | I believe that the plans for Pukehangi Heights severely underestimate the very large volume of water that runs down Hunts farm when it rains especially in storms. We are therefore scared of being flooded out and having our house ruined. Currently the natural gullies and underground streams take care of this water but the extreme landscaping changes necessary for houses and the large areas covered in buildings and concrete etc. will cause flooding and damage to all the properties and homes across from the development. We also feel that the council has not taken into account the effects of global warming and the increase in severe weather events which will increase the amount of water impacting the surrounding area which will no longer be able to be contained by the current natural environment. | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 35.1        | Michael Victor Collingwood Storey | Construction Effects                | Oppose           | Dust and health effects  | We are also concerned about other adverse health effects from the construction. Due to extra dust and dirt from the construction we believe this will have an adverse effect on our child that has asthma impacting on his standard of living.  | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 35.2        | Michael Victor Collingwood Storey | Construction Effects                | Oppose           | Vibration                | Due to the geological stability of the land in its present form and the road construction equipment and works and the structural damage it will cause to our home and property. Our home is already rattled and shaken when a heavy truck occasionally goes past. We therefore do not wish to have structural damage from the large volume of heavy trucks etc. all day every day while the work is carried out over a sustained period.  | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 35.3        | Michael Victor Collingwood Storey | Transportation and the Road Network | Oppose           | Road safety              | We are concerned that the council has not adequately taken into account the impact on current residents and their ability to safely enter and leave our property and road as well as the safety of our children due to the increased traffic flow along Pukehangi Road not only during the construction but afterwards as well.   | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 35.4        | Michael Victor Collingwood Storey | Three Waters                        | Oppose           | Water supply             | We also feel that the council has not adequately taken into account the effect that this large volume of houses will have on the current fresh water supply in the immediate area, both on current residents and water table in the surrounding environment. Already during summer there are water pressure issues due to the increase in water demand and unless additional reservoirs are built there will be inadequate water supply levels resulting in an increase in health and safety issues due to water shortages which will result in an increased fire risk.   | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 36.0        | Victor Collingwood Storey         | Natural Hazards                     | Oppose           | Storm water and Flooding | I believe that the plans for Pukehangi Heights severely underestimate the very large volume of water that runs down Hunts farm when it rains especially in storms. We are therefore scared of being flooded out and having our house ruined. Currently the natural gullies and underground streams take care of this water but the extreme landscaping changes necessary for houses and the large areas covered in buildings and concrete etc. will cause flooding and damage to all the properties and homes across from the development. We also feel that the council has not taken into account the effects of global warming and the increase in severe weather events which will increase the amount of water impacting the surrounding area which will no longer be able to be contained by the current natural environment. | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 36.1        | Victor Collingwood Storey         | Construction Effects                | Oppose           | Dust and health effects  | We are also concerned about other adverse health effects from the construction. Due to extra dust and dirt from the construction we believe this will have an adverse effect on our child that has asthma impacting on his standard of living.  | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 36.2        | Victor Collingwood Storey         | Construction Effects                | Oppose           | Vibration                | Due to the geological stability of the land in its present form and the road construction equipment and works and the structural damage it will cause to our home and property. Our home is already rattled and shaken when a heavy truck occasionally goes past. We therefore do not wish to have structural damage from the large volume of heavy trucks etc. all day every day while the work is carried out over a sustained period.  | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 36.3        | Victor Collingwood Storey         | Transportation and the Road Network | Oppose           | Road safety              | We are concerned that the council has not adequately taken into account the impact on current residents and their ability to safely enter and leave our property and road as well as the safety of our children due to the increased traffic flow along Pukehangi Road not only during the construction but afterwards as well.   | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 36.4        | Victor Collingwood Storey         | Three Waters                        | Oppose           | Water supply             | We also feel that the council has not adequately taken into account the effect that this large volume of houses will have on the current fresh water supply in the immediate area, both on current residents and water table in the surrounding environment. Already during summer there are water pressure issues due to the increase in water demand and unless additional reservoirs are built there will be inadequate water supply levels resulting in an increase in health and safety issues due to water shortages which will result in an increased fire risk.   | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 37.0        | Susan Marie Storey                | Natural Hazards                     | Oppose           | Storm water and Flooding | I believe that the plans for Pukehangi Heights severely underestimate the very large volume of water that runs down Hunts farm when it rains especially in storms. We are therefore scared of being flooded out and having our house ruined. Currently the natural gullies and underground streams take care of this water but the extreme landscaping changes necessary for houses and the large areas covered in buildings and concrete etc. will cause flooding and damage to all the properties and homes across from the development. We also feel that the council has not taken into account the effects of global warming and the increase in severe weather events which will increase the amount of water impacting the surrounding area which will no longer be able to be contained by the current natural environment. | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 37.1        | Susan Marie Storey                | Construction Effects                | Oppose           | Dust and health effects  | We are also concerned about other adverse health effects from the construction. Due to extra dust and dirt from the construction we believe this will have an adverse effect on our child that has asthma impacting on his standard of living.  | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 37.2        | Susan Marie Storey                | Construction Effects                | Oppose           | Vibration                | Due to the geological stability of the land in its present form and the road construction equipment and works and the structural damage it will cause to our home and property. Our home is already rattled and shaken when a heavy truck occasionally goes past. We therefore do not wish to have structural damage from the large volume of heavy trucks etc. all day every day while the work is carried out over a sustained period.  | <u>NOT</u> to go ahead with the Pukehangi Heights development |
| 37.3        | Susan Marie Storey                | Transportation and the Road Network | Oppose           | Road safety              | We are concerned that the council has not adequately taken into account the impact on current residents and their ability to safely enter and leave our property and road as well as the safety of our children due to the increased traffic flow along Pukehangi Road not only during the construction but afterwards as well.   | <u>NOT</u> to go ahead with the Pukehangi Heights development |

SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name                        | Topic                                   | Support / Oppose       | Provision  | Reasons   | Decision Sought  |
|-------------|---------------------------------------|---|------------------------|--|---|--|
| 37.4        | Susan Marie Storey                    | Three Waters                            | Oppose                 | Water supply   | We also feel that the council has not adequately taken into account the effect that this large volume of houses will have on the current fresh water supply in the immediate area, both on current residents and water table in the surrounding environment. Already during summer there are water pressure issues due to the increase in water demand and unless additional reservoirs are built there will be inadequate water supply levels resulting in an increase in health and safety issues due to water shortages which will result in an increased fire risk.   | NOT to go ahead with the Pukehangi Heights development   |
| 38.0        | Rotorua and BOP Hunting               | Natural Hazards                         | Oppose                 | Storm water and Flooding   | The Rotorua & BOP Hunt is the owner of 130 Riri St and as a result of several incidents of heavy rain the Mangakakahi stream floods and overflows and enters the building causing considerable damage. The water level from the flood approx. 2 years ago (same one that caused major damage at Ngongotaha) rose to almost 4 metres and carpet and doors required replacement. As a result of the heavy rain on Christmas evening the flooding again entered the building and completely covered the parking area with muddy silt.  | The state of the Mangakakahi stream is disgusting and is completely overgrown by shrubs and grass and is the council's duty to both clean and keep the streams clean. THIS IS NOT HAPPENING. Before this plan change can go ahead any size of pipe reticulation must be of a size that will service the whole area for 100 years. Both the Mangakakahi and the Utuhina streams should be widened and deepened as well as stop banks, otherwise they will not have any chance of coping with the additional water from this development and Rotorua will experience continual flooding. |
| 39.0        | Rachel Mischewski                     | Transportation and the Road Network     | Support with amendment | Noise and speed  | Road extremely noisy as is, speeding and road noise big issue. Speed humps make more noise when cars race over them.  | No excess road noise. Would need to reduce speed limit. Use seal that absorbs sound or similar material. Put in islands to slow traffic and allow pedestrians to cross.  |
| 40.0        | W L Gracie and Associates Ltd         | Natural Hazards                         | Oppose                 | Storm water and Flooding   | Objects to the plan change on the basis of the flooding in the lower Mangakakahi stream. The area of concern is from Linton Park to the Utuhina Stream. The area of concern requires clearing of undergrowth and trees which haven't been cleared by Council for a number of years. Without this work being carried out we have had serious flooding through our commercial buildings causing damage to customer's property and our own property. We have operated from these sites for 35 years and have had many serious floods costing us thousands of dollars and ignored by Council staff. The history of flooding goes back over 60 years. It starts from the Utuhina Stream up the Mangakakahi Stream through the Matawhero Street and Depot Street, Old Taupo Road through to Shorlands and Macaulay Metals, Hyundai car depot, milk treatment depot and Sunset Road. This area has had no planning for this period of time. Plans of bunds in Linton Park have been a waste of money and failed. The engineering staff need to plan this area for 50 - 100 year flooding before any further planning is done on from Linton Park. Floods carry disease. I have picked up a cellulitis disease from flood water. This disease is fatal if you have any broken skin. I have had this disease for about 9 years. There are many other owners in the area that had serious damage done to clients property including stored furniture, legal documents and parked cars damaged. There have been a number of units where tenants have bailed out. I consider the District Council should be responsible for what has happened and carry out their responsibility. Driving around Rotorua there have been many other streams lacking maintenance and could cause flooding. Please do the necessary job. Oppose the plan because there is no flood protection at the lower end of the Mangakakahi stream connecting to the Utahina streams. Pond built on Linton Park have not worked in the past so don't waste our ratepayers money. Clean and widen the flood plain from Linton Park and start from Utahina stream. This would give the area 50-100 year protection.   | My answer to discuss with those affected it can be fixed easily otherwise we will be requiring compensation for each flood and it won't be cheap   |
| 41.0        | Jill Margaret Revell                  | Landscape and Ecological Values         | Support with amendment | Landscape values   | I am the owner of 217A Pukehangi Road and the Sunnybrook proposal is adjacent to my western boundary. I am in general agreement with the proposal and in particular the green belts separating the residential areas. As a rule I believe Rotorua's high caldera areas should be read as vegetation areas with the housing meeting the 37% reflectivity provisions as in Lakes A Rural Zones. The end of Matipo Avenue is a bad example of this and Parklands a good example.   | I am in agreement if housing lots follow this plan but would be very worried if housing lots were allowed against my boundary as there would be no way of controlling the storm water leading to flooding of those lots.   |
| 41.1        | Jill Margaret Revell                  | Natural Hazards                         | Support with amendment | Storm water  | The present Sunnybrook Farm area adjacent to my property is a flood plane. I have witnessed on several occasions flooding which runs across Sunnybrook which can be 300mm deep x 30m across. Sunnybrook Farm land adjacent to my property is lower than my land so flood waters can affect my property but are generally dissipated down the boundary on Sunnybrook land. I notice that in the storm water masterplan options that two detention basins are proposed in Figure 2 Plan against my boundary which I am fully in agreement with so long as they are at the same level or lower than existing ground level. I am in agreement if housing lots follow this plan but would be very worried if housing lots were allowed against my boundary as there would be no way of controlling the storm water leading to flooding of those lots. I have had Council Engineers inspect my boundary and have shown them the lower levels of Sunnybrook and given them photos of a flood. Although checking with environmental lawyers and surveyors that it is illegal to alter land to deviate flood water on to my land I am still worried that it may happen.  | I am in agreement if housing lots follow this plan but would be very worried if housing lots were allowed against my boundary as there would be no way of controlling the storm water leading to flooding of those lots.   |
| 42.0        | Ngāti Whakaue -Te Kōmiro o te Utuhina | Culture, Archaeology and Heritage       | Support with amendment | Introduction Policy 2.9  | The Pukehangi Development Area Structure Plan refers to the Ngāti Kea Ngāti Tuara Cultural Impact Assessment when discussing the cultural impacts of the development on tangata whenua. However, the cultural impacts of the Pukehangi Development Area Structure Plan on Ngāti Whakaue are not covered within the Ngāti Kea Ngāti Tuara Cultural Impact Assessment. Therefore, the Pukehangi Development Area Structure Plan must be amended to include reference to the cultural resources, sites, values and practices of Ngāti Whakaue; and the impacts of the plan change on these.  | Retain recognition of the Cultural Impact Assessment prepared by Te Rūnanga o Ngāti Kearoa Ngāti Tuarā and add to the introduction and policy 2.9 a recognition of the potential for cultural impacts on other iwi and hapū and the wider cultural landscape including downstream sites and values   |
| 42.1        | Ngāti Whakaue -Te Kōmiro o te Utuhina | Culture, Archaeology and Heritage       | Support with amendment | Performance Standards for Subdivision A5.2.3.4.10 and A5.2.4.4.6<br>Performance Standards for Land Use A5.2.3.3 and A5.2.4.3<br>Structure Plan Key |   | Retain and expand performance standards to include reference to potential cultural impacts on other iwi and hapū and introduce similar performance standards to be applied to land use applications. Label identified sites on structure plan as both Cultural and Archaeological sites.   |
| 42.2        | Ngāti Whakaue -Te Kōmiro o te Utuhina | Culture, Archaeology and Heritage       | Support with amendment | Policy 2.9   |   | Retain and amend to include reference to potential cultural impacts on other iwi and hapū, their associations to the area and the wider cultural landscape including downstream sites. Add to the policy a process for altering subdivision and development plans to accommodate the discovery of culturally significant sites within the area. This could be achieved by amending the last bullet point of Policy 2.9 to refer to mitigating, remedying or avoiding adverse effects on discovered, as well as already identified, cultural sites and areas.                           |
| 42.3        | Ngāti Whakaue -Te Kōmiro o te Utuhina | Residential and Rural Residential Zones | Support with amendment | Non-Notification   | The current provisions outlined within the Pukehangi Development Area Structure Plan to enable non-notification of any application for resource consent to develop are:<br><i>A5.2.4.2 Non-Notification: Any application for resource consent for the activities listed in Table 5.2.4.1 a 5-7 shall be considered without public or limited notification or the need to obtain the written approval from affected parties if the Land Use and/or Subdivision are consistent with the principles of the Pukehangi Development Area Structure Plan.</i><br><i>A5.2.5.2 Non-Notification: An application for resource consent for the activity listed as 3 Table A5.2.5.1 shall be considered without public or limited notification or the need to obtain the written approval from affected parties if the Land Use and/or Subdivision are consistent with the principles of the Pukehangi Development Area Structure Plan.</i><br><i>A5.2A.1 Introduction: The general principles are:</i> <ul style="list-style-type: none"><li>• <i>Development that responds to the landscape values of the Caldera Rim and the topography of the area;</i></li><li>• <i>Development that recognises, protects and provides for the expression of the cultural and archaeological values of the area;</i></li><li>• <i>Roads, walkways and cycleway connections throughout the area and connecting with adjoining sites;</i></li><li>• <i>Comprehensively designed low impact storm water management integrated with development;</i></li><li>• <i>Enhancement of ecological values by including indigenous vegetation plantings; and</i></li><li>• <i>Excellent urban design outcomes for solar access and passive surveillance of public spaces.</i></li></ul> Absolutely nothing within the provisions and in particular the general principles outlined within the plan require applicants to ensure their developments will enhance the mauri of our tupuna awa and associated taonga species; or recognise and protect the cultural resources, sites, values and practices of our whānau, hapū and iwi downstream. In effect this means Rotorua Lakes Council has determined Ngāti Whakaue to be a non-affected party; and has written policy to enable developers to apply for non-notified resource consents without having to take into account the impacts of their development plans on the iwi. Furthermore Rotorua Lakes Council is doing this through a process that has removed any right for Ngāti Whakaue to appeal these provisions to the Environment Court. The provisions for non-notification must be amended now to enable tangata whenua to be considered affected parties. | Reword the structure plan principles to ensure it is tangata whenua who determine if the recognition and protection of cultural values is appropriate and the expression of those values provided for; and revise the non-notification provisions to provide for tangata whenua as affected parties.   |
| 42.4        | Ngāti Whakaue -Te Kōmiro o te Utuhina | Natural Hazards                         | Support with amendment | Objective 2<br>Policy 2.3<br>Objective 3<br>Policy 3.1   | Rotorua Lakes Council has made Ngāti Whakaue aware of a number of storm water reports that have been undertaken on water quantity and flood risk, but has produced no actual storm water modelling or designs that could give the iwi any confidence that our lands and homes will be safe from increased risk of flooding due to the Pukehangi Development Area Structure Plan. Policy within the plan needs to ensure that resource consent applications which do not reduce flood risk to our whānau, hapū and iwi living downstream from the development are rejected.  | Retain Objective 2 and expand to include surrounding areas and downstream water quality improvements. Retain Policy 2.3 and low impact design principles throughout the Structure Plan. Retain Objective 3 and Policy 3.1. Add a policy stating that applications which do not demonstrate that they will avoid an increase in downstream flood risk and negative impact on water quality will be refused consent.   |
| 42.5        | Ngāti Whakaue -Te Kōmiro o te Utuhina | Three Waters                            | Support with amendment | Lake Rotorua Water Quality   | The Pukehangi Development Area Structure Plan contains no objectives or policies aimed at ensuring the protection and/or enhancement of Lake Rotorua water quality. Lake Rotorua is a taonga to Ngāti Whakaue.  | The plan change should not proceed without robust modelling which demonstrates that nutrient flows within the Rotorua Lake catchment will be reduced.  |

SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

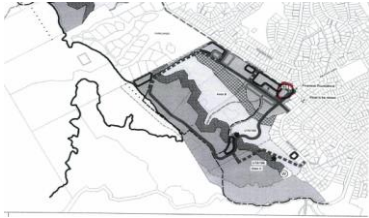
| Submitter # | Submitter Name                           | Topic                                     | Support / Oppose   | Provision                       | Reasons  | Decision Sought  |
|-------------|--|---|--|---------------------------------|--|--|
| 42.6        | Ngāti Whakaue -Te Kōmiro o te Utuhina    | Three Waters                              |  |                                 | After a century of local councils supporting works and developments along the Utuhina that have directly resulted in the loss of water and food security for Ngāti Whakaue; the devastation of our cultural resources and sites; and impacts on our cultural practices to the point where the intergenerational bonds between our whānau and tupuna awa have been severed, it is time that Rotorua Lakes Council takes responsibility for ensuring the protection of the rights of mana whenua to restore and protect our wai, taonga species, cultural resources, sites, values and practices. This can only be done with objectives and policies that explicitly state that the mauri of our tupuna awa and associated taonga species must be enhanced, and our cultural resources, sites, values and practices recognised and protected by any upstream developments.   | To ensure this, the Pukehangi Development Area Structure Plan must <u>require</u> development incorporating green infrastructure and water sensitive design to the highest possible standard to ensure no flooding or negative impacts on water quality occur downstream as part of any development plan i.e: <ul style="list-style-type: none"><li>• <u>Require</u> integrated management of land use and storm water.</li><li>• <u>Require</u> the management of water quality and quantity through the application of low impact design including the development of “treatment trains” using measures that distribute storm water management across the development sites including:<ul style="list-style-type: none"><li>o Source Control – individual lot level storm water management including soak holes for capturing roof runoff, rain gardens, rainwater harvesting;</li><li>o Site Control – collecting and conveying runoff from a collection of lots through to smaller storm water management facilities including dry attenuation zones and swales;</li><li>o Regional Control – larger dedicated catchment facilities, such as detention basins, ponds and wetlands</li></ul></li><li>• <u>Require</u> storm water infiltration measures based on a geotechnical assessment to achieve and maintain a low level of risk of landslip or liquefaction within the Development Area without increasing risk elsewhere;</li><li>• <u>Require</u> the minimising of the formed width of roads to reduce storm water run-off while ensuring that road function and safety are maintained;</li><li>• <u>Require</u> the integrated use of open space for storm water management and recreation including<ul style="list-style-type: none"><li>o the provision and protection of adequate space to safely accommodate detention ponds</li><li>o and overland flow paths; and</li><li>o ensuring that appropriate storm water infrastructure is provided at the right time and that costs are shared on an equitable basis.</li></ul></li></ul>  |
| 42.7        | Ngāti Whakaue -Te Kōmiro o te Utuhina    | Three Waters                              | Support with amendment                                       |                                 | Ngāti Whakaue want to be assured that Rotorua Lakes Council takes into effect the national significance of freshwater and Te Mana o te Wai through the National Policy Statement for Freshwater Management 2014. The Policy Statement requires Council to consult and engage with our communities, to set objectives for the state of freshwater bodies in its region and to set limits to meet these objectives. That includes requirements to: <ul style="list-style-type: none"><li>• engage with tangata whenua to identify the values they have for freshwater;</li><li>• involve iwi and hapū in decision-making and management of freshwater; and</li><li>• determine the appropriate set of methods for the objectives and limits.</li></ul> Ngāti Whakaue supports the Cultural Impact Assessment prepared by Ngāti Kearoa Ngāti Tuarā, and the submissions by Ngāti Kearoa Ngāti Tuarā and Te Arawa Lakes Trust.   | We seek amendments to the Plan Change to address the issues raised in the submissions of Ngāti Kearoa Ngāti Tuarā, Te Arawa Lakes Trust and Ngāti Whakaue including: <ul style="list-style-type: none"><li>• Recognition and protection of cultural values, sites and associations;</li><li>• Status of tangata whenua as affected parties;</li><li>• Water quality and quantity within the Utuhina catchment including the Otamatea and Mangakakahi;</li><li>• Lake Rotorua Water Quality</li></ul>   |
| 43.0        | Rotorua Lakes Council                    | Residential and Rural Residential Zones   | Support with amendment                                       | Yield                           | The Minister for the Environments direction on PC2: Pukehangi Heights includes the following Statement of Expectations: <i>The recommended Plan Change 2: Pukehangi Heights should provide sufficient development capacity for a minimum housing yield of approximately 790 dwellings, comprising a mix of densities and typologies that will meet demand, while recognising the constraints that apply to the land that is subject to the rezoning.</i>   | That consideration is given to ways to achieve the Ministers Direction   |
| 43.1        | Rotorua Lakes Council                    | Residential Design, Layout and Appearance | Support with amendment                                       | A5.2.3.3.4                      | Consider providing for a higher percentage of impermeable area for semi-detached units and medium density development to reflect likely site coverage for these forms of development.  | Amend Performance Standard A5.2.3.3 to read: The maximum site coverage for impermeable surfaces shall be 55%, <u>except for: semi-detached units and medium density residential development where the site coverage for impermeable surfaces shall be 80%.</u>   |
| 43.2        | Rotorua Lakes Council                    | Residential Design, Layout and Appearance | Support with amendment                                       | A5.2.3.3.6a                     | Consider including a definition of Semi Detached Unit to provide clarity to the performance standard, and to differentiate between detached (stand-alone) dwellings and terraced dwellings.  | That a definition is included within the Part 17: Definitions of the District Plan:  |
| 43.3        | Rotorua Lakes Council                    | Residential Design, Layout and Appearance | Support with amendment                                       | A5.2.3.3.9                      | Would be useful to clarify the difference between: c. Minimum net site area: 1500m2 d. Minimum net site area per dwelling: 200m2   | A reference to a 'parent site' is used elsewhere in the District Plan (Rule 4.5.17), or any other amendment with like effect.  |
| 44.0        | Bay of Plenty Regional Council Toi Moana | Culture, Archaeology and Heritage         | Support; subject to any relevant issues raised subsequently. | Consultation                    | Ngāti Whakaue Iwi and Hapū have cultural associations with the Utuhina River.  | RLC to engage with Te Kōmiti Nui o Ngāti Whakaue to ensure they endorse the Cultural Impact Assessment prepared by Ngāti Kea Ngāti Tuarā for the plan change.  |
| 44.1        | Bay of Plenty Regional Council Toi Moana | General                                   | Support; subject to any relevant issues raised subsequently. | Consultation                    | Consultation has not yet occurred with Te Arawa Lakes Trust who have an interest in the effects of development on the surrounding catchments around Rotorua.   | RLC to consider engagement with the Te Arawa Lakes Trust to take into account the, 'Te Arawa Lakes Trust Environmental Management Plan', in particular, Section 5 (Waiora: Lake Health & Wellbeing (pg. 44 ). <a href="https://tearawa.iwi.nz/wp-content/uploads/2019/12/TeArawa_LT_CFEF_Brox_2019_V6REVISED.pdf">https://tearawa.iwi.nz/wp-content/uploads/2019/12/TeArawa_LT_CFEF_Brox_2019_V6REVISED.pdf</a>  |
| 44.10       | Bay of Plenty Regional Council Toi Moana | Three Waters                              | Amend to proposed Rural 2 zoning.                            | Water Quality                   | The section 32 evaluation and plan change wording A5.2A.1 appears to indicate the intention is 'large lot residential' rather than 'rural/residential lifestyle' lots, however, the plan change is seeking a Rural 2 zoning. The proposed zoning may be more appropriately aligned to the intended purpose. The intention appears to be more akin to Residential 4 or Residential 5.   | (i) Amending the proposed Rural 2 zoning to suitable large lot residential zoning would align more closely with the intent of the plan change thereby removing potentially inappropriate activities on steep escarpments listed in Table 9.5 such as ‘farming activities’ and their associated nutrients. It may also reduce potential reverse sensitivity issues.<br>If the intention is to retain farming activities and similar activities in Rural 2 - Table 9.5 these will need to be worked into the land suitability, nutrient management and water quality assessment;<br>(ii) Other approaches that would appropriately address the matters raised above and, other relevant part of this submission; and<br>(iii) Any consequential amendments as required.  |
| 44.11       | Bay of Plenty Regional Council Toi Moana | Three Waters                              | Amend A5.2.6.  | Nutrients and Lake Rotorua      | The Restricted Discretionary Assessment criteria currently does not consider the impact of significant reductions in nutrient losses.  | (i) Amend to the extent to which the proposed land use and/or subdivision will contribute to water quality improvement in the lake, promote good management practices and result in significant reductions in nutrient losses or at least no net increase in nutrients to Lake Rotorua (based on 2032 NDA);<br>(ii) Other amendments that would appropriately address the matters raised above and in this submission; and/or<br>(iii) Any consequential amendments as required.   |
| 44.12       | Bay of Plenty Regional Council Toi Moana | Three Waters                              | Amend as appropriate.  | Water Quality                   | The proposed provisions do not sufficiently reflect Objectives 13.3.2 and 13.3.5 and Policies 13.3.2.1 and 13.3.5.10 of the RLC District Plan which seek to ensure subdivision layout of boundaries, considers land use capability and good management practice to avoid water quality issues to future land use of the lots result in good management practices.  | (i) Strengthen the proposed planning provisions throughout to reflect objectives 13.3.2 and 13.3.5 of RLC District Plan) and policies (to reflect 13.3.2.1 and 13.3.5.10 of the RLC District Plan) to ensure subdivision layout of boundaries, considers land use capability and good management practice to avoid water quality issues to future land use of the lots result in good management practices;<br>(ii) Other approaches that would appropriately address the matters raised above and, other relevant part of this submission; and<br>(iii) Any consequential amendments as required.   |
| 44.2        | Bay of Plenty Regional Council Toi Moana | Natural Hazards                           | Support/Oppose   | Integrated catchment management | The flood protection assets owned and managed by BOPRC in the lower Utuhina catchment have been the subject of engineering assessments which have identified they are at capacity. Flooding frequently occurs in the lower part of the catchment. BOPRC’s 2014 Lower Utuhina flood model outputs for the 1% AEP event identify that flooding affects, private residential, commercial and industrial land, cultural and social buildings (such as Te Roro O Te Rangī Marae, Bethlehem College Chapman, Living Well Church) and infrastructure such as roads and bridges. The flood protection assets are also subject to residual risk, for instance, the risk to the community during an event that exceeds the capacity of the system (an over-design event). Storm water assessments have been undertaken as part of the plan change investigation for the immediate downstream environments, RLC storm water catchment 14 (Mangakakahi) and catchments 15 (Otamatea), not the entire receiving catchment. These isolated storm water assessments show that peak discharge levels in the individual tributaries can be managed by introducing detention and release the increased runoff from the development over time. However, they do not consider the cumulative effects of the proposal as a whole on the receiving Utuhina catchment, in particular, the lower Utuhina part of the catchment. Flood maps for the existing developed areas for these catchments have been provided with the Plan Change documentation, and quantitative assessment of pre and post-development values has been undertaken. However, both of these catchments are flowing into the Utuhina Stream, which has been identified as being at capacity. The additional volume could create adverse effects in the Lower Utuhina (Appendix 2). The effects of the development on the downstream environment (Utuhina Stream and its tributary) therefore need to be considered in a comprehensive manner. Considerable uncertainty still exists on how the lower Utuhina catchment will be impacted by the proposed storm water management approach. And specifically, as to whether the flood risk in this location (outside the development sites) will be increased. A comprehensive approach to resource management is encapsulated by Policies IR 3B (adopt an integrated approach) and IR 5B (assessing cumulative effects). Therefore, BOPRC consider the proposed provisions (performance standards and policies in particular) relating storm water and natural hazard risk requiring assessment at subdivision stage and, relying on future storm water consents would not comprehensively manage the cumulative adverse storm water effects on the Greater Utuhina Catchment in an integrated manner..... (continues in adjoining cell) | ... (continues from previous cell) Further, given the known existing risk and further potential impact on the lower catchment, BOPRC consider that a precautionary approach (Pol IR 1B) to avoid further widespread flooding and damage to private properties and/or infrastructure assets is an appropriate planning response. The council’s Hazards Advisor and Storm water Engineer note that the submitted documentation recognises that a risk assessment and comprehensive storm water assessment cannot be undertaken until the modelling work for the greater Utuhina Catchment is complete. At which time, a comprehensive risk assessment and a comprehensive storm water assessment can be undertaken to inform future development in an integrated manner appropriately. BOPRC consider that further advances in the modelling for the Greater Utuhina Catchment may provide greater certainty to ascertain whether the storm water effects can be mitigated prior to the scheduled hearing in June 2020. However, this will be subject to the successful calibration of the Greater Utuhina Catchment Model within a short time period.<br><br>Planning provisions - Storm water and natural hazard risk):<br>Objectives 3, 4, Policy 3.1 and 4.1, Performance Standards 7 and 8 of A5.2.3.4 (subdivision) and, 4 and 5 of A5.2.4.4 (subdivision) and, others related provisions to give effect to the relief sought.<br><br>Support: The intent of the provisions to manage cumulative effects arising from storm water and flooding in an integrated manner on the receiving Utuhina Catchment.<br>Oppose: To the extent that the provisions do not require a comprehensive assessment and appropriate of potential cumulative natural hazard risk and stormwater effects across the Development Site and impact on the receiving environment prior to any subdivision and/or development.<br><br>Therefore, BOPRC consider that the proposed provisions are not the most appropriate way to achieve the integrated management of cumulative stormwater effects and natural hazards for plan changes (includingstructure plans) as set out in Policies IR 1B, IR 3B and IR 5B of the BOPRC RPS and relevant future growth provisions of the RL DP (Chapter 12) including Obj 12.3.2 and Policy 12.3.2.1 which seeks to ensure growth takes into account infrastructue constraints.<br><br>Integrated catchment management<br>(i) Amend the provisions and any other consequential amendments to provide for a comprehensive risk assessment and storm water assessment on a catchment-wide basis to be undertaken prior to the commencement of any subdivision, use or development in the Development Site;<br>(ii) Amend the provisions and any other consequential amendments to explicitly provide for mitigation if required following the above catchment-wide assessments; and/or<br>(iii) As updated following further information prior to pre-hearing mediation (mid-April) or thereafter. |

SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name                           | Topic           | Support / Oppose | Provision   | Reasons   | Decision Sought  |
|-------------|--|-----------------|------------------|---|---|--|
| 44.3        | Bay of Plenty Regional Council Toi Moana | Natural Hazards | Oppose:          | Planning provisions - Storm water and natural hazard risk): | <p>BoPRC opposes to the extent that the provisions do not require a comprehensive assessment and appropriate of potential cumulative natural hazard risk and storm water effects across the Development Site and impact on the receiving environment prior to any subdivision and/or development. BOPRC consider that the proposed provisions are not the most appropriate way to achieve the integrated management of cumulative storm water effects and natural hazards for plan changes as set out in Pol IR 1B,IR 3B and IR 5B of the BOPRC RPS and relevant future growth provisions of the RL DP incl Obj 12.3.2 and Pol 12.3.2.1 which seeks to ensure growth takes into account infrastructure constraints. The flood protection assets owned &amp; managed by BOPRC in the lower Utuhina catchment have been the subject of assessments which have identified they are at capacity. Flooding frequently occurs in the lower part of the catchment. BOPRC's 2014 Lower Utuhina flood model outputs for the 1% AEP event identify that flooding affects, private residential, commercial and industrial land, cultural and social buildings and infrastructure such as roads and bridges. The flood protection assets are also subject to residual risk, for instance, the risk to the community during an event that exceeds the capacity of the system. Storm water assessments have been undertaken as part of the plan change investigation for the immediate downstream environments, catchment 14 (Mangakakahi) &amp; catchment 15 (Otamatea), not the entire receiving catchment. These isolated storm water assessments show that peak discharge levels in the individual tributaries can be managed by introducing detention and release the increased runoff from the development over time. However, they do not consider the cumulative effects of the proposal as a whole on the receiving Utuhina catchment, in particular, the lower Utuhina part of the catchment. Flood maps for the existing developed areas for these catchments have been provided with the Plan Change documentation, &amp; quantitative assessment of pre &amp; post-development values has been undertaken. However, both of these catchments are flowing into the Utuhina Stream, which has been identified as being at capacity. The additional volume could create adverse effects in the Lower Utuhina. The effects of the development on the downstream environment need to be considered in a comprehensive manner. Uncertainty exists on how the lower Utuhina catchment will be impacted by the proposed approach. And as to whether the flood risk in this location will be increased. A comprehensive approach to resource management is encapsulated by Pol IR 3B and IR 5B. BOPRC consider the proposed provisions relating storm water &amp; natural hazard risk requiring assessment at subdivision stage and, relying on future storm water consents would not comprehensively manage the cumulative adverse storm water effects on the Greater Utuhina Catchment in an integrated manner..... (continues in adjoining cell)</p> | <p>...(continues from previous cell) Given the known existing risk and further potential impact on the lower catchment, BOPRC consider that a precautionary approach (Pol IR 1B) to avoid further widespread flooding and damage to private properties and/or infrastructure assets is an appropriate planning response. The council's Hazards Advisor and Storm water Engineer note that the submitted documentation (OPUS Reports) recognises that a risk assessment and comprehensive storm water assessment cannot be undertaken until the modelling work for the greater Utuhina Catchment is complete. At which time, a comprehensive risk assessment (App L of RPS) and a comprehensive storm water assessment can be undertaken to inform future development in an integrated manner appropriately. BOPRC consider that further advances in the modelling for the Greater Utuhina Catchment may provide greater certainty to ascertain whether the storm water effects can be mitigated prior to the scheduled hearing in June 2020. However, this will be subject to the successful calibration of the Greater Utuhina Catchment Model within a short time period.</p> <p>Objectives 3, 4, Policy 3.1 and 4.1, Performance Standards 7 and 8 of A5.2.3.4 (subdivision) and, 4 and 5 of A5.2.4.4 (subdivision) and, others related provisions to give effect to the relief sought.</p> <p>(i) Amend the provisions and any other consequential amendments to provide for a comprehensive risk assessment and storm water assessment on a catchment-wide basis to be undertaken prior to the commencement of any subdivision, use or development in the Development Site;</p> <p>(ii) Amend the provisions and any other consequential amendments to explicitly provide for mitigation if required following the above catchment-wide assessments; and/or</p> <p>(iii) As updated following further information prior to pre-hearing mediation (mid-April) or thereafter.</p> |
| 44.4        | Bay of Plenty Regional Council Toi Moana | Natural Hazards | Support:         | Natural Hazard Risk   | <p>Further technical feedback</p> <p>BoPRC supports subject to a comprehensive assessment of natural hazard risk under Appendix L of the RPS as required by Policy NH 9B of the RPS.</p> <p>Reasons: Risk Assessments for hazards to are required (Policy (NH 9B)) in line with Appendix L (Risk Assessment) of the RPS (natural hazards) and to achieve a low level of risk without increasing risk outside of the development site as required by Policy NH 4B (managing natural hazard risk)</p> <p>The council's Hazard advisor confirms the following:</p> <ul style="list-style-type: none"><li>• Although not conclusive in the s.32 report, BOPRC consider that the hazards relevant to the proposal are land instability, faults, flooding, liquefaction and volcanic activity;</li><li>• However, the submitted Risk Assessments for all identified hazards do not fully comply with Appendix L (Risk Assessment) of the RPS and further work is required to understand where a low level of risk can be achieved.</li></ul>  | <p>Refer to the above Relief for Submission Point 3.</p>   |
| 44.5        | Bay of Plenty Regional Council Toi Moana | Natural Hazards | Support/Oppose   | Stormwater and Flooding                                     | <p>Further technical feedback</p> <p>BoPRC supports the intent of the provisions to manage cumulative effects arising from natural hazard risk and storm water in an integrated manner on the receiving Utuhina Catchment.</p> <p>BoPRC opposes to the extent that the provisions do not require a comprehensive assessment and appropriate mitigation of potential cumulative stormwater effects and natural hazard risk across the Development Site (Sunny Downs, Hunts Farm, Twin Oaks) and impact on the receiving environment prior to any subdivision and/or development.</p> <p>Therefore, BOPRC consider that the proposed provisions are not the most appropriate way to achieve the integrated management of cumulative stormwater effects and natural hazards for plan changes (including structure plans) as set out in Policies IR 1B, IR 2B, IR 3B and IR 5B of the BOPRC RPS and relevant future growth provisions of the RL DP (Chapter 12) including Objective 12.3.2 and Policy 12.3.2.1 which seeks to ensure growth takes into account infrastructure constraints.</p> <ul style="list-style-type: none"><li>• The council's stormwater engineer considers that the provision of a catchment-wide stormwater assessment and appropriate mitigation measures such as stormwater detention ponds are essential to mitigate the stormwater effects on the downstream receiving environment.</li><li>• While the use of a catchment-wide Storm water Management Plan (SMP) is outlined in the s.32 as well as the potential to include the plan change area in RLC's comprehensive storm water discharge consents following further modelling, the planning provisions requires an SMP at subdivision stage, which may not consider the cumulative effects of the generated storm water from the entire plan change area.</li><li>• Any storm water discharge and associated mitigation works must not compromise the design and/or function of the flood protection scheme assets or any other infrastructure, such as bridges/culverts and any associated level of service with the community.</li><li>• BOPRC as scheme operator and affected party requests the opportunity to comment on mitigation measures.</li></ul> <p>Note: The stop bank and drainage scheme design standards (technical levels of service) can be found in 2018-2068 Rivers and Drainage Asset Management Plan, Table 11 (<a href="https://cdn.boprc.govt.nz/media/786843/rivers-and-drainage-asset-management-plan-2018_2068-final-print.pdf">https://cdn.boprc.govt.nz/media/786843/rivers-and-drainage-asset-management-plan-2018_2068-final-print.pdf</a>).</p>   | <p>(i) Refer to the above Relief for Submission Point 3; and</p> <p>(ii) Amend the provisions (notification) to include BOPRC as scheme operator and affected party with the opportunity to comment on mitigation measures for the comprehensive assessment and on individual developments.</p>  |
| 44.6        | Bay of Plenty Regional Council Toi Moana | Natural Hazards | Oppose:          | Storm water   | <p>Further technical feedback</p> <p>BoPRC opposes to the extent that the provisions do not require a comprehensive assessment and appropriate mitigation of potential cumulative storm water effects and natural hazard risk across the Development Site (Sunny Downs, Hunts Farm, Twin Oaks) and impact on the receiving environment prior to any subdivision and/or development.</p> <p>Therefore, BOPRC consider that the proposed provisions are not the most appropriate way to achieve the integrated management of cumulative storm water effects and natural hazards for plan changes (including structure plans) as set out in Policies IR 1B, IR 2B, IR 3B and IR 5B of the BOPRC RPS and relevant future growth provisions of the RL DP (Chapter 12) including Objective 12.3.2 and Policy 12.3.2.1 which seeks to ensure growth takes into account infrastructure constraints.</p> <p>The council's storm water engineer confirms the following:</p> <ul style="list-style-type: none"><li>• The council's storm water engineer considers that the provision of a catchment-wide storm water assessment and appropriate mitigation measures such as storm water detention ponds are essential to mitigate the storm water effects on the downstream receiving environment.</li><li>• While the use of a catchment-wide Storm water Management Plan (SMP) is outlined in the s.32 as well as the potential to include the plan change area in RLC's comprehensive storm water discharge consents following further modelling, the planning provisions requires an SMP at subdivision stage, which may not consider the cumulative effects of the generated storm water from the entire plan change area.</li><li>• Any storm water discharge and associated mitigation works must not compromise the design and/or function of the flood protection scheme assets or any other infrastructure, such as bridges/culverts and any associated level of service with the community.</li><li>• BOPRC as scheme operator and affected party requests the opportunity to comment on mitigation measures.</li></ul> <p>Note: The stop bank and drainage scheme design standards (technical levels of service) can be found in 2018-2068 Rivers and Drainage Asset Management Plan, Table 11 (<a href="https://cdn.boprc.govt.nz/media/786843/rivers-and-drainage-asset-management-plan-2018_2068-final-print.pdf">https://cdn.boprc.govt.nz/media/786843/rivers-and-drainage-asset-management-plan-2018_2068-final-print.pdf</a>).</p>  | <p>(i) Refer to the above Relief for Submission Point 3; and</p> <p>(ii) Amend the provisions (notification) to include BOPRC as scheme operator and affected party with the opportunity to comment on mitigation measures for the comprehensive assessment and on individual developments.</p>  |



SUBMISSIONS TO ROTORUA DISTRICT PLAN - PLAN CHANGE 2: PUKEHANGI HEIGHTS

| Submitter # | Submitter Name                           | Topic                                       | Support / Oppose   | Provision                         | Reasons   | Decision Sought   |
|-------------|--|---|--|-----------------------------------|---|---|
| 44.7        | Bay of Plenty Regional Council Toi Moana | Three Waters                                | Seek further information and likely amendment to address nutrient management, water quality and land use suitability matters raised. | Water Quality                     | The section 32 analysis provides a very brief statement about nutrient management in Section 4.15 and within the high level options evaluation. Section 4.15 states: "When landowners subdivide and develop their sites they will need to ensure that the change in land use is within the limits established in their Nitrogen Management Plans, including an allowance for the additional load on the Council's wastewater treatment plant. The proposed urbanisation at Pukehangi is likely to be within the defined Nitrogen Discharge Allocations. If not land owners have options available to them, for example, reducing stock numbers where farming operations are present, revegetation or reduction the number of dwellings." This statement is not substantiated by any assessment – and in any event is unlikely to be correct given the number of lots and potential development intensities being considered. A comprehensive assessment – including potential mitigation options - is needed in this respect. The options evaluation against DP Objective 13.3.1 is also very brief and assigns a green traffic light colouring against all options stating: "Nutrients are controlled by the Regional Natural Resources Plan". While this is true for the 'Retain current future growth area' and 'Rural zone' options which are effectively the status quo, the other options result in residential and small rural lots under 5ha which will be permitted in terms of nutrient management under the RNRP which haven't been designed to meet DP Objective 13.3.1. Proposed Plan Change 10 provisions apply to rural properties in the Lake Rotorua groundwater catchment where land is held in large parcels (>5ha) and existing rural land uses continue. Once subdivided and developed, there will effectively be no management of nutrient discharges under Proposed Plan Change 10 as all resulting lots will be reticulated and expected to be well under the LR R3 permitted 5ha property size (unless small rural lots are used for commercial cropping, horticulture or dairying in which case a resource consent would be required). DP Objective 13.3.1 states: 'Subdivision enables definitive land use change which results in significant reductions in nutrient losses, thereby contributing to water quality improvements in the lakes, rivers, streams, wetlands and other water bodies within the District. The Regional Natural Resources Plan provisions within Proposed Plan Change 10 are designed to achieve the rural properties contribution to achieve a reduction of nitrogen to Lake Rotorua of 435 tonnes per annum. It hasn't been designed to achieve the District Plan stated objective which requires 'significant reductions in nutrient losses' in return for definitive land use change. This requires below the line reductions not achievement of the NDA's by 2032. See submission for more. | (i) Revisit the options evaluation with respect to the Regional Natural Resources Plan and nutrient management. Consider including other relevant objectives and policies, for example DP Objective 9.3.1 and associated policies; (ii) An assessment of land use suitability, water quality and nutrient management effects should be undertaken by a suitably qualified person/s in enough detail to confirm the proposed lot yield and potential household units can be accommodated within the NDA for the parent land and demonstrate that the resulting subdivision and development enabled is designed to achieve water quality and nutrient management objectives and policies in the District Plan, appropriately gives effect to the RPS and is consistent with the RNRP nutrient management provisions for this catchment; (iii) Refine the proposed plan change to ensure subdivision and subsequent development is designed within nutrient management limits, land use suitability best practice and water quality and nutrient management outcomes demonstrate significant reductions in nutrient losses - DP policy, or at least no net increase in nitrogen entering Lake Rotorua – based on parent properties 2032 NDA's; (iv) Amend plan change provisions to ensure the assessment inform the provisions and if necessary set parameters for stock numbers, numbers of houses per site etc. in an integrated way rather than leaving these for each of the developers to consider and impose limitations on particular lots or land uses for future owners; (v) The plan change provisions should be informed by advice from an assessment from a suitably qualified land use capability and nutrient advisor to confirm the suitability or otherwise for the proposed land uses on the escarpments; (vi) Amend plan change provisions to be clear whether rural land uses such as farming are permitted or otherwise. If so the plan change should set up an integrated set of parameters for the plan change area rather than leave it up to each of the developers to impose limitations on particular lots or land uses for future owners in an ad hoc way. These may include setting appropriate parameters such as stock numbers, limiting horticulture, numbers of houses per site. Alternatively, the proposed zoning could be amended to align more closely with the intended large lot residential – similar to Residential 4 or 5; (vii) Add appropriate policies to deliver water quality and land suitability outcomes and direction alongside the landscape objectives and policies to give effect to the relevant RPS Water quality objectives and policies as well as district plan policy framework – refer Objective 13.3.1 and associated policies, Objective 9.3.1 and associated policies as examples; (viii) Add appropriate performance standards to A5.2.4.4. including what applications shall include A5.2.4.4.6; (ix) Other approaches that would appropriately address the matters raised above and, other relevant part of this submission; and (x) Any consequential amendments as required. The assessment mentioned above will need to clarify potential numbers of houses for each of the structure plan areas and amendments made to provisions if necessary. |
| 44.8        | Bay of Plenty Regional Council Toi Moana | Three Waters                                | Further information to inform plan change.   | Water Quality                     | The proposed plan change could be clearer as to whether the resulting land use is residential in nature or a mix of residential and rural/residential. The plan change description and s32 analysis describes large lot residential, however the proposed zoning sought is Rural 2. Rural 2 provides for lots with a minimum lot size of 4000m2, if reticulated and farming activities, forestry etc. The plan change described 'partially re-vegetated native bush and specimen tree network', land use in areas not re-vegetated will need to be factored into land use suitability and nutrient management advice. A desktop analysis indicates much of proposed RR2 land is Class 6e and are escarpment areas with a very steep contour. Careful subdivision layout, boundary placement and land management is likely to be required to maintain land cover on steep pumice slopes at the densities proposed. Soil retention / prevention of erosion are key requirements to maintaining and enhance lake water quality and positive outcomes for ecosystem health. Similar slopes within the Parklands estate were revegetated and effectively excluded from development which has been very effective. A similar approach was taken with the steep RR2 slopes within Brunswick Park. Information was provided with the Twin Oaks proposal about the suitability or otherwise of southern steep slopes which may be useful to inform this plan change. At present the proposed plan change has this slope zoned Rural 2 which allows a minimum site area of 4000m2 and farming which may not be appropriate.   | (i) The plan change provisions should be informed by advice from an assessment from a suitably qualified land use capability and nutrient advisor to confirm the suitability or otherwise for the proposed land uses on the escarpments. (ii) Amend plan change provisions to be clear whether rural land uses such as farming are permitted or otherwise. If so the plan change should set up an integrated set of parameters for the plan change area rather than leave it up to each of the developers to impose limitations on particular lots or land uses for future owners in an ad hoc way. These may include setting appropriate parameters such as stock numbers, limiting horticulture, numbers of houses per site. Alternatively, the proposed zoning could be amended to align more closely with the intended large lot residential – similar to Residential 4 or 5; (iii) Add appropriate policies to deliver water quality and land suitability outcomes and direction alongside the landscape objectives and policies to give effect to the relevant RPS Water quality objectives and policies as well as district plan policy framework – refer Objective 13.3.1 and associated policies, Objective 9.3.1 and associated policies as examples; (iv) Add appropriate performance standards to A5.2.4.4. including what applications shall include A5.2.4.4.6. (The assessment mentioned above will need to clarify potential numbers of houses for each of the structure plan areas and amendments made to provisions if necessary); (v) Other approaches that would appropriately address the matters raised above and, other relevant part of this submission and/or (vi) Any consequential amendments as required.   |
| 44.9        | Bay of Plenty Regional Council Toi Moana | Three Waters                                |  | Water Quality                     | The plan change places significant weight on being 'consistent with the principles of the Pukehangi Development Area Structure Plan'. Non notification decisions outlined in A5.2.3.2, A5.2.4.2 and A5.2.5.2 appear to be based on a judgement as to whether Land Use and/or Subdivision are consistent with the principles of the Pukehangi Development Area Structure Plan. General and place specific principles outlined in A5.2A.1 should have more prominence within the plan change structure and could be more clearly headed as such. They are currently sitting within the introduction. Guiding principles also need to be strengthened to include principles relevant to land use suitability and water quality guidance.   | Provide suitable heading for general and place specific principles such as heading rather than within the introduction. Strengthen principles to include land use suitability and water quality. Amended principles could be worded as follows: (i) Subdivision layout, alignment of boundaries, lots sizes and future land uses that ensure best management practice outcomes for water quality, protection of highly erodible steep slopes, maintains suitable ground cover, and enhances ecosystem health; (ii) Subdivision and future land use is designed within nutrient management limits, demonstrates significant nutrient losses (to achieve Objective 13.3.1, or at least no net increase in nitrogen entering Lake Rotorua – based on parent properties 2032 NDA's to meet PC10); (iii) Staging of proposed subdivision and development demonstrates nutrient management requirements to be met throughout the various stages of development; (iv) Other approaches that would appropriately address the matters raised above and, other relevant part of this submission; and (v) Any consequential amendments as required.  |
| 45.0        | Jacqueline Gail van der Waals            | Culture, Archaeology and Heritage           | Oppose   | Protection of trees and buildings | Proposed structure plan 20/07/19 revision J. See marked area on attached plan. Current area is occupied by Phoenix palm where original homestead (built in 1919) was situated. Shearing shed and other outbuildings along with London plan tree and row of Lawson cypress trees opposite Malfroy/Pukehangi Road intersection. London plane tree provided shade for working in the stockyards.   | I would like all the trees listed to be protected and/or incorporated into the new development. The shearing shed and surround outbuildings are iconic and need saving to preserve the heritage and history of this area for current and future generations.  |
| 45.0        | Jacqueline Gail van der Waals            | Culture, Archaeology and Heritage           | Oppose   | Protection of trees and buildings |   | I would like all the trees listed to be protected and/or incorporated into the new development. The shearing shed and surround outbuildings are iconic and need saving to preserve the heritage and history of this area for current and future generations.  |
| 46.0        | Greg and Heather Bell                    | Residential and Rural Residential Zones     |  | Privacy and security              | • We are concerned about the intensive housing being proposed under initial draft plans.  | • We want to see significant planting undertaken to protect our privacy, visual outlook and screening from neighbouring houses.   |
| 46.1        | Greg and Heather Bell                    | Construction Effects                        |  | Noise and dust                    | • Noise/Dust: should the change go through we will be subjected to years of dust, construction noise etc.   | • Noise/Dust: we require some form of compensation for this.  |
| 46.2        | Greg and Heather Bell                    | Appropriateness of Zones and Structure Plan |  | Walking Tracks                    | • We do not want walking tracks in the vicinity of our property and as past experience in Rotorua shows this allows access to less desirable elements   |   |
| 46.3        | Greg and Heather Bell                    | Residential and Rural Residential Zones     |  | Amenity                           | • Because of the visual impact of a massive subdivision as proposed,  | • We would like to see special amenity values placed around the subdivision such as wider roads, dimmed street lighting etc. to make the subdivision aesthetically pleasing, and less impact of glare on our property views.  |
| 46.3        | Greg and Heather Bell                    | Landscape and Ecological Values             |  | Revegetation                      | • Because of the visual impact of a massive subdivision as proposed,  | • We also want some control of planted areas in front of our home with regard to species, tree heights and an understanding of how the maintenance of these areas will be undertaken.   |
| 46.4        | Greg and Heather Bell                    | Culture, Archaeology and Heritage           |  | Heritage Building                 |   | • We feel that the current woolshed should remain as a historical building as it is a big part of the beautiful farmscape we look down on.  |
| 46.4        | Greg and Heather Bell                    | Landscape and Ecological Values             |  | Caldera Rim                       | • Because of the unique natural landscape that the farm currently provides to the backdrop of Rotorua it is important that the natural vista of the caldera rim is protected.   | We need to know that the aesthetics from a distance still remain- e.g. natural house colours and roofs, streetlight glare is minimized, car headlights are hidden at night and not shining directly into our property.  |
| 46.5        | Greg and Heather Bell                    | Transportation and the Road Network         |  | Roading upgrades                  | • There will be a massive increase in traffic trying to access town via Pukehangi Rd at peak times, and we need to know that the council has appropriate upgrades planned at the key intersection points.   | • We need to know that the council has appropriate upgrades planned at the key intersection points.   |
| 46.6        | Greg and Heather Bell                    | Natural Hazards                             |  | Water control                     | • Currently the surrounding Hunt Farm absorbs the runoff from the shared driveway.  | • We need to know that the plan has accounted for this, and appropriate measures put in place to take this water once houses are all around us. We do not want to be liable for water runoff through private properties within the subdivision.   |
| 46.7        | Greg and Heather Bell                    | Three Waters                                |  | Domestic water supply             | • Currently our home domestic water supply runs in from a spring at the head of the Utuhina stream and we have unlimited fresh clear water from this.<br>• We also have concerns that a new water reservoir/water supply scheme has not been finalized by the council   | • The subdivision will impact on our ability to maintain this supply and any subdivision plan needs to allow for hooking our house up to the new water supply and not at our expense.<br>• We need to know its location and effects on our property prior to the subdivision going ahead.   |

| Submitter # | Submitter Name          | Topic   | Support / Oppose | Provision            | Reasons   | Decision Sought |
|-------------|-------------------------|---------|------------------|----------------------|---|-----------------|
| 47.0        | Unison Networks Limited | General |                  | Electricity Networks | <p>Unison Networks is the electricity network business supplying Rotorua and would be involved with supplying the Pukehangi Heights Development area. Although Unison does not have any specific comments on the proposed District Plan change, we wanted to alert interested parties to the electrical implications of the development. Unison's network in that area of Rotorua is approaching its capacity limit. Accordingly, to supply the development would require Unison to provide a new feeder from Transpower's Malfroy Road Grid Exit Point and for Transpower to invest in a new circuit breaker. We estimate that this would cost approximately \$1.4 million and depending on the nature of the development and expected electrical requirements may require a capital contribution. Depending on Transpower's requirements, it may be a two year period before the new supply would be available. In the interim, depending on the speed of development, Unison may be able to provide some limited supply. It should be noted the costs of reticulation of the development itself would be additional to the cost estimate above. In addition, Unison notes the proposed new round-about at the intersection of Malfroy Road and Pukehangi Road. Depending on the final design and lay-out, this may require Unison to relocate or make adjustments some of its assets.</p> <p>In order to facilitate timely supply of electricity to the development, Unison encourages the Rotorua Lakes Council and developers to engage with Unison early to ensure that we have a full understanding of the development's requirements and desired timeframes, so that we can incorporate it into Unison's asset development plans and come to appropriate commercial arrangements for the supply. Given the capacity available in the area, early engagement with Unison is preferred.</p> |                 |