

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / General point on Subdivision / General point on Subdivision	Tyers Stream Group	221.66	Amend	Considers that the RMA definition of river applies to streams. There are also waterways in Wellington with an annual flow bed width that is more than 3m wide, including Tyers Stream downstream from approximately the junction of Delhi and Karachi Crescents.  [Refer to original submission for full reason]	Seeks that appropriate esplanade provision be made along the margins of Tyers Stream, and other waterways, whenever subdivision occurs (as is required by the RMA) to create better linkages and facilitate more liveable spaces and lower energy/runoff intensity use of areas,
Subdivision chapter / General point on Subdivision / General point on Subdivision	Waka Kotahi	370.189	Amend	Subdivision close to the state highway corridor should be at least restricted discretionary, and (as noted elsewhere), if there is a blanket distance from the state highway, it should be 100m. At subdivision stage there can be better options available to manage noise exposure rather than leaving it to treating individual houses, which does not protect outdoor amenity and can constrain residents to having to use mechanical ventilation.	Seeks to amend to require consent (at least restricted discretionary) for subdivision within 100m of a state highway.
Subdivision chapter / General point on Subdivision / General point on Subdivision	Taranaki Whānui ki te Upoko o te Ika	389.83	Oppose	Opposes the zoning and extent of overlays proposed over Te Motu Kairangi / Miramar Peninsula, Mount Crawford.  Submitter supports the protection of areas of significant indigenous vegetation as well as landscapes that have cultural, historical, spiritual and traditional significance to Taranaki Whānui, the identification and protection of environmental overlays in previously developed areas is of concern to Taranaki Whānui.  Concerns there is potential for these overlays to significantly restrict future development and opportunities for Taranaki Whānui to exercise tino rangatiratanga over their ancestral lands.	Seeks that the zoning and extent of overlays proposed over Te Motu Kairangi / Miramar Peninsula, Mount Crawford is removed; specifically at Part Lot 1 DP 4741, Section 4 SO 477035, PT LOT 1 DP 4741 - WELLINGTON PRISON, Section 1 SO 477035, Part Section 20 Watts Peninsula DIST.
Subdivision chapter / General point on Subdivision / General point on Subdivision	Taranaki Whānui ki te Upoko o te Ika	389.84	Amend	Considers that overlays to significantly restrict future development and opportunities for Taranaki Whānui to exercise tino rangatiratanga over our ancestral lands.	Seeks that any other relief to enable Taranaki Whānui to exercise tino rangatiratanga over our RFR properties in Te Motu Kairangi.
Subdivision chapter / General point on Subdivision / General point on Subdivision	Taranaki Whānui ki te Upoko o te Ika	389.85	Oppose	Opposes the zoning and extent of overlays proposed over Te Motu Kairangi / Miramar Peninsula, Mount Crawford.  Submitter supports the protection of areas of significant indigenous vegetation as well as landscapes that have cultural, historical, spiritual and traditional significance to Taranaki Whānui, the identification and protection of environmental overlays in previously developed areas is of concern to Taranaki Whānui.  Concerns there is potential for these overlays to significantly restrict future development and opportunities for Taranaki Whānui to exercise tino rangatiratanga over their ancestral lands.	Seeks that the zoning and extent of overlays proposed over Te Motu Kairangi / Miramar Peninsula, Mount Crawford is removed; specifically at Part Lot 1 DP 4741, Section 4 SO 477035, PT LOT 1 DP 4741 - WELLINGTON PRISON, Section 1 SO 477035, Part Section 20 Watts Peninsula DIST.
Subdivision chapter / General point on Subdivision / General point on Subdivision	Taranaki Whānui ki te Upoko o te Ika	389.86	Amend	Considers that overlays to significantly restrict future development and opportunities for Taranaki Whānui to exercise tino rangatiratanga over our ancestral lands.	Seeks that any other relief to enable Taranaki Whānui to exercise tino rangatiratanga over our RFR properties in Te Motu Kairangi.
Subdivision chapter / General point on Subdivision / General point on Subdivision	Wellington International Airport Ltd	406.255	Amend	[No specific reason given beyond decision requested - see original submission]	Seeks that the subdivision chapter is amended to align with the decisions requested in submission points found in paragraph 4.68.1 to 4.68.3 of the original submission.  [Refer to paragraphs 4.68.1 to 4.68.3 of the original submission]
Subdivision chapter / General point on Subdivision / General point on Subdivision	Wellington International Airport Ltd	406.256	Amend	[No specific reason given beyond decision requested - see original submission]	Seeks that the subdivision chapter is amended to discourage intensification of noise-sensitive activities through subdivision within the Air Noise Boundary or Outer Air Noise Overlay.
Subdivision chapter / General point on Subdivision / General point on Subdivision	Wellington International Airport Ltd	406.257	Amend	A number of the objectives and policies restrict or limit subdivision activities in certain overlays. None of these provisions however reflect the ANB or 60dB Ldn Boundary for the Airport.	Seeks that objectives and policies in the subdivision are amended to ensure that Air Noise Boundary and the Outer Air Noise Overlay is sufficient to manage aircraft noise and reverse sensitivity effects.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / General point on Subdivision / General point on Subdivision	Wellington International Airport Ltd	406.258	Amend	A number of the objectives and policies restrict or limit subdivision activities in certain overlays. None of these provisions however reflect the ANB or 60dB Ldn Boundary for the Airport.	Seeks that subdivision activities are restricted within the 60dB Ldn Boundary.
Subdivision chapter / General point on Subdivision / General point on Subdivision	Wellington International Airport Ltd	406.259	Amend	[No specific reason given beyond decision requested - see original submission]	Seeks that the subdivision chapter is amended to simplify rules and remove repetition.
Subdivision chapter / General point on Subdivision / General point on Subdivision	Wellington International Airport Ltd	406.260	Amend	[No specific reason given beyond decision requested - see original submission]	Seeks that further guidance is added with regards to where it is necessary for building platforms to be identified as a part of subdivision activity.
Subdivision chapter / General point on Subdivision / General point on Subdivision	Wellington International Airport Ltd	406.261	Amend	[No specific reason given beyond decision requested - see original submission]	Seeks that there is no requirement for building platforms to be identified within the Airport Zone.
Subdivision chapter / Subdivision / General SUB	Wellington City Council	266.95	Oppose in part	Considers provisions relating to the consideration of 'any consent notices, covenants, easements or other legal instruments necessary' gives too much discretion to the assessment of controlled and restricted discretionary activities.	Seeks to delete matter of control / discretion below from the rules listed:  <del>Any consent notices, covenants, easements or other legal instruments necessary.</del>  Relevant rules: SUB-R1.1.7 SUB-R2.2.4 SUB-R3.2.5 SUB-R3.3.8 SUB-R4.1.3 SUB-R4.2.4 SUB-R5.1.3 SUB-R5.2.7 SUB-R5.3.4 SUB-R17.1.3 SUB-R17.2.3 SUB-R18.1.1c SUB-R19.1.3 SUB-R22.1.3 SUB-R23.1.3 SUB-R26.1.3
Subdivision chapter / Subdivision / General SUB	Wellington City Council	266.96	Amend	Considers provisions relating to the consideration of 'any consent notices, covenants, easements or other legal instruments necessary' gives too much discretion to the assessment of controlled and restricted discretionary activities.	Seeks to delete matter of control / discretion below from the rules listed:  <del>Any consent notices, covenants, easements or other legal instruments necessary.</del>  Relevant rules: SUB-R1.1.7 SUB-R2.2.4 SUB-R3.2.5 SUB-R3.3.8 SUB-R4.1.3 SUB-R4.2.4 SUB-R5.1.3 SUB-R5.2.7 SUB-R5.3.4 SUB-R17.1.3 SUB-R17.2.3 SUB-R18.1.1c SUB-R19.1.3 SUB-R22.1.3 SUB-R23.1.3 SUB-R26.1.3
Subdivision chapter / Subdivision / General SUB	Transpower New Zealand Limited	315.166	Amend	Considers that in order to assist with plan interpretation and application, reference to the National Grid as a qualifying matter within the introductory/plan relationship text of the subdivision chapter of the PDP should be included.	Amend the introduction to the Subdivision Chapter as follows:  Other relevant District Plan provisions  It is important to note that in addition to the provisions in this chapter, subdivision must comply with all applicable rules and standards for qualifying matter areas and a number of other Part 2: District-Wide chapters also contain provisions that may be relevant, including:  ...  - Infrastructure - the subdivision chapter includes rules to implement objectives and policies in the Infrastructure Chapter where certain types of subdivision are in close proximity to some network utilities. <u>The National Grid is a qualifying matter with its rules to be applied.</u>  ...  Resource consent may therefore be required under rules in this chapter as well as other chapters. Unless specifically stated in a rule or in this chapter, resource consent is required under each relevant rule. The steps to determine the status of an activity are set out in the General Approach chapter.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / General SUB	Transpower New Zealand Limited	315.167	Support	Considers the introductory text to the Subdivision Chapter provides guidance as to the applicability of the rule and policy provisions. Supports this guidance, in particular the reference that the area specific and topic specific provisions apply. A minor amendment is sought to amend the reference 'topic specific' to 'district wide' as it is considered the term 'topic specific' is not otherwise used in the plan and therefore it may be unclear to plan users to which provisions the term applies.	Retain the Introductory text to the Subdivision Chapter, subject to a minor amendment.
Subdivision chapter / Subdivision / General SUB	Transpower New Zealand Limited	315.168	Amend	Considers the introductory text to the Subdivision Chapter provides guidance as to the applicability of the rule and policy provisions. Supports this guidance, in particular the reference that the area specific and topic specific provisions apply. A minor amendment is sought to amend the reference 'topic specific' to 'district wide' as it is considered the term 'topic specific' is not otherwise used in the plan and therefore it may be unclear to plan users to which provisions the term applies.	Amend the introductory text to the Subdivision Chapter as follows: ... Rule SUB-R1 relates specifically to subdivision of land for the purpose of the construction and use of residential units in the Medium Density Residential Zone and the High Density Residential Zone. Subdivisions under Rule SUB-R1 are not subject to Rules SUB-R2 – SUB-R5, but are subject to the area specific and topic-specific district wide rules where the land also contains a corresponding planning notation or overlay. .....
Subdivision chapter / Subdivision / General SUB	Transpower New Zealand Limited	315.169	Support	Supports guidance provided within the introduction to the PDP that clarifies for plan users that the objectives and policies relating to subdivision within the National Grid Yard are provided within the INF Chapter. Considers such direction is necessary given the PDP chapters separates the rules from the supporting policy framework.	Seeks to retain the text within the 'Other relevant District Plan provisions' section of the Introduction to the Subdivision chapter.
Subdivision chapter / Subdivision / General SUB	Greater Wellington Regional Council	351.178	Amend	Considers that in riparian margins landward of the coastal environment, the first step to assessing the potential effects of an activity (such as subdivision) on natural character requires determining the natural character rating, both at the site and area scales. Therefore, including a new policy to direct natural character ratings to be identified in riparian margins landward of the coastal environment will ensure that potential effects can be managed as part of the assessment of environmental effects in accordance with the natural character rating.	Seeks to include a new process policy as requested in the Natural Character chapter, for WCC to identify natural character ratings in riparian margins landward of the coastal environment and, in the interim, for WCC officers to work with applicants for resource consent to determine as to whether a natural character assessment is required as part of a resource consent process.
Subdivision chapter / Subdivision / General SUB	Kāinga Ora Homes and Communities	391.187	Support in part	The Introduction to the Subdivision chapter is generally supported, but amendments are sought to clarify the effects of poorly designed subdivisions are related to vacant lot subdivisions where the land use activities have not been designed.	Retain the Introduction to the Subdivision chapter with amendments.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / General SUB	Kāinga Ora Homes and Communities	391.188	Amend	<p>Considers that the Introduction to the Subdivision chapter should be amended to clarify how the effects of poorly designed subdivisions are related to vacant lot subdivisions where the land use activities have not been designed. Further amendments are sought to clarify that the District Plan seeks to provide a more enabling framework for combined land use and subdivision resource consents. Further amendments are sought for clarity as it is considered that the explanation of the application of the objectives, policies and rules is confusing and does not provide further clarity, and that the objectives, policies and rules themselves should clearly describe how they apply.</p>	<p>Amend the Introduction to the Subdivision chapter as follows:</p> <p>...</p> <p>In addition to facilitating increased housing supply and choice, subdivision is related to the Council's aims for a more sustainable and resilient future for Wellington. For example, poorly designed <u>vacant lot</u> subdivisions can limit neighbourhood connectivity and cohesion, entailing also longer travel times, greater reliance on private vehicle transport and associated increases in greenhouse gas emissions.</p> <p>...</p> <p>Poorly-designed <u>vacant lot</u> subdivisions can also lead to greater energy consumption an associated costs for home heating, relative to designs that make better use of solar aspect another renewable energy opportunities. <u>Objectives, policies, rules and standards included in the subdivision chapter seek to manage the effects of vacant lot subdivision.</u></p> <p>When subdivision and related land use activities are assessed concurrently, it enables a comprehensive understanding of the resulting pattern, scale and density of development. For this reason, the Council prefers combined subdivision and land use resource consent applications to be made wherever possible <u>and therefore the District Plan provides a more enabling framework for combined subdivision and land use application. However, it is understood that such an integrated approach is not always practicable or preferable for applicants, for a variety of reasons.</u></p> <p>...</p> <p>Subdivisions commonly lead to in an increase in intensity of land use activity, and <u>additional</u> steps may need to be taken <u>for vacant lot at subdivisions stage</u> to ensure existing and future activities can be serviced for access, water supply, wastewater disposal, stormwater management, telecommunications and power supply.</p> <p>....</p>
Subdivision chapter / Subdivision / General SUB	Kāinga Ora Homes and Communities	391.189	Amend	<p>Considers that the Introduction to the Subdivision chapter should be amended to clarify the effects of poorly designed subdivisions are related to vacant lot subdivisions where the land use activities have not been designed. Further amendments are sought to clarify that the District Plan seeks to provide a more enabling framework for combined land use and subdivision resource consents. Further amendments are sought for clarity as it is considered that the explanation of the application of the objectives, policies and rules is confusing and does not provide further clarity, and that the objectives, policies and rules themselves should clearly describe how they apply.</p>	<p>Amend the Introduction to the Subdivision chapter as follows:</p> <p>...</p> <p>Subdivision is only permitted in limited circumstances. <u>Under</u> Section 223 of the RMA, <u>a requires that a survey plan for such subdivisions may be submitted to Council for approval provided that a certificate of compliance has been obtained for the subdivision and that certificate has not lapsed.</u></p> <p>...</p> <p><del>Rule SUB R1 relates specifically to subdivision of land for the purpose of the construction and use of residential units in the Medium Density Residential Zone and the High Density Residential Zone. Subdivisions under Rule SUB R1 are not subject to Rules SUB R2 – SUB R5, but are subject to the area specific and topic specific rules where the land also contains a corresponding planning notation or overlay.</del></p> <p><del>With the exception of Rule SUB R1, the general subdivision objectives, policies and rules apply to all subdivision proposals, including those that affect land subject to other planning map notations, areas, or overlays. To the extent relevant, this includes Objectives SUB O1 and SUB O2, Policies SUB P1 – SUB P8, and Rules SUB R2 – SUB R5.</del></p> <p><del>In addition to those general provisions, the area specific and topic specific policies and rules apply to subdivisions affecting land subject to the applicable planning notation or overlay. This includes Policies SUB P9 – SUB P26, and Rules SUB R6 – SUB R21.</del></p>
Subdivision chapter / Subdivision / General SUB	Kāinga Ora Homes and Communities	391.190	Support in part	<p>Headings in the Subdivision chapter are partially supported and some additional heading are proposed.</p>	<p>Retain the Subdivision chapter with amendments.</p>

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Subdivision chapter / Subdivision / General SUB	Kāinga Ora Homes and Communities	391.191	Amend	Considers that the Subdivision chapter should be amended to have additional headings are added to the chapter to categorise the policies to help with plan legibility and usability.	Amend the Subdivision chapter to add new policy headings as follows:  <u>Historic Heritage and Cultural Values:</u> SUB-P8 – SUB-P13  <u>Natural Environment:</u> SUB-P14 – SUB-P19  <u>Coastal Environment:</u> SUB-P20 – SUB-P24  <u>Natural Hazards:</u> SUB-P25 – SUB-P26
Subdivision chapter / Subdivision / General SUB	Kāinga Ora Homes and Communities	391.192	Support in part	The introduction of notification preclusion statement (for both public and limited notification) for restricted discretionary activities is supported. It is sought that this is applied to all restricted discretionary activities.	Retain the Introduction to the Subdivision chapter as notified, with chapter subject to amendments.
Subdivision chapter / Subdivision / General SUB	Kāinga Ora Homes and Communities	391.193	Amend	Considers that all rules in the Subdivision chapter should have a notification preclusion statement (for both public and limited notification) for restricted discretionary activities. The technical nature of these breaches requires technical and/or engineering assessments, and public participation by way of limited or public notification will unlikely add anything to the consideration of the effects of these breaches. Particularly, the notification statuses for SUB-R1 generally relate to the land use activity and associated standards, and the subdivision itself is not generating additional effects that should trigger notification.	Amend all Rules in the Subdivision chapter to include a notification preclusion statement for activities under Restricted Discretionary as follows:  <u>Notification:</u> <u>Applications under this rule are precluded from being publicly or limited notified in accordance with section 95A or section 95B of the RMA.</u>
Subdivision chapter / Subdivision / General SUB	Kāinga Ora Homes and Communities	391.194	Oppose in part	Opposes the matter of control and matter of discretion to 'any consent notices, covenants, easements or other legal instructed necessary' with all controlled and restricted discretion activities are opposed. An amendment is sought for all Rules in the Subdivision chapter.	Opposes the matter of control and matter of discretion to 'any consent notices, covenants, easements or other legal instructed necessary' with all controlled and restricted discretion activities and requests amendments.
Subdivision chapter / Subdivision / General SUB	Kāinga Ora Homes and Communities	391.195	Amend	Considers that all Rules in the Subdivision chapter should be amended to remove matters of discretion for activities with controlled and restricted discretionary status referring to 'any consent notices, covenants, easements or other legal instructed necessary'. This should not be a determining matter for discretion when granting consent. Anticipated development is provided for within the framework of the underlying zone and relevant district plan provisions, and covenants and consent notices are tools that are currently provided for when necessary and appropriate under current legislation. Deletion is sought in all rules.	Amend all Rules in the Subdivision chapter to remove reference of "Any consent notices, covenants, easements or other legal instruments necessary".
Subdivision chapter / Subdivision / General SUB	Kāinga Ora Homes and Communities	391.196	Oppose in part	The inclusion of design guides as a statutory document and matter of discretion with the Subdivision chapter Rules is opposed. Design guides should act as a tool to give effect to the outcomes in the objectives and policies of the chapter. Deletion is sought in all rules.	Opposes all references to design guides throughout all rules in the plan.
Subdivision chapter / Subdivision / General SUB	Kāinga Ora Homes and Communities	391.197	Amend	Considers that all Rules in the Subdivision chapter should be amended to remove Design Guides. Design guides should act as a tool to give effect to the outcomes in the objectives and policies of the chapter and should not be considered as statutory documents in matters of discretion. Deletion is sought in all rules.	Amend all Rules in the Subdivision chapter to remove references of Design Guides.
Subdivision chapter / Subdivision / General SUB	Wellington International Airport Ltd	406.262	Amend	Considers that amendments are required to other provisions within the subdivision chapter to remove the complex and duplicating consenting requirements for activities withing the Airport Zone.  [See paragraphs 4.76 to 4.80 in original submission for full reason]	Seeks that the subdivision chapter is amended to delete subdivision methods other than SUB-R4 insofar as they relate to infrastructure and/or provide clarification that the other provisions are not applicable to infrastructure.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / New SUB	Trelissick Park Group	168.17	Amend	Considers that subdivision should not be allowed in significant natural areas.	Add a new provision to the Subdivision chapter to prevent subdivision in significant natural areas.  [Inferred decision requested].
Subdivision chapter / Subdivision / New SUB	Waka Kotahi	370.190	Amend	<p>The Submitter seeks an additional standard which subdivision activities shall be assessed against when located within specified distances of the state highway network. Notes that it is widely accepted nationally and internationally that noise from transport networks have the potential to cause adverse health and amenity effects on people living nearby. That potential has been documented by authoritative bodies such as the World Health Organisation (WHO), including the Publication Environmental Noise Guidelines for the European region in October 2018 (WHO Europe Guidelines).</p> <p>State highways pass through both urban and rural areas throughout the Wellington City District and most have sufficient traffic volumes to generate sound above WHO Europe Guideline levels, indicating there will be impacts on human health and amenity where noise sensitive activities locate nearby.</p> <p>Applying the metric setback approach is a moderately efficient and effective method of managing noise effects on human health when compared to alternatives such as do nothing, modelling a setback, or creating a 'no build' yard zone. In the future, the submitter may seek a change to this standard to reflect modelling data which is a highly efficient and effective method of management.</p> <p>[See original submission for further details]</p>	<p>Add a new Standard to the Subdivision chapter as follows:</p> <p><u>SUB-SX</u> <u>Subdivision resulting in the creation of new sites 100m of a State Highway (measured from the nearest painted edge of the carriageway).</u></p> <p><u>Assessment criteria where the standard is infringed:</u></p> <ol style="list-style-type: none"> <li><u>1. The potential adverse effects of noise generated from the road network.</u></li> <li><u>2. The potential adverse effects of site development on the efficient use and operation of the state highway network and the suitability of any mitigation measures relating to noise and vibration to enable the continued operation of the network.</u></li> <li><u>3. Whether any consultation with Waka Kotahi NZ Transport Agency has occurred and the outcome of that consultation.</u></li> <li><u>4. Whether a consent notice with regard to reverse sensitivity effects on the State Highway network is proposed.</u></li> <li><u>5. Whether any proposed building platform or development should be restricted to parts of the site.</u></li> <li><u>6. Whether there are any special topographical features or ground conditions which may mitigate effects on the operation of the State Highway network.</u></li> </ol>
Subdivision chapter / Subdivision / New SUB	Kāinga Ora Homes and Communities	391.198	Amend	Considers that the Subdivision chapter should have an additional objective added to the subdivision chapter which speaks directly to the outcomes sought for subdivision within or on land identified as having historical values, natural environmental values and coastal values. This addition is sought to set a clear overarching objective to the policies concerned with these environments which are more sensitive to change.	Add a new Objective to the Subdivision chapter as follows:  <u>SUB-O[number]</u>  <u>Subdivision is managed in areas with identified historical values, natural environmental and coastal values, where subdivision can have adverse effects on the values that the District Plan seeks to manage or protect.</u>
Subdivision chapter / Subdivision / New SUB	Wellington International Airport Ltd	406.263	Amend	Considers that a new policy is required to address subdivision within the Air Noise Boundary and 60dB Ldn Noise Boundary.	Add a new policy to SUB chapter as follows:  <u>SUB-P27 Subdivision of land affected by the Air Noise Boundary or 60dB Ldn Noise Boundary</u>  <u>Avoid subdivision within the Air Noise Boundary or 60dB Ldn Noise Boundary where the potential future permitted density of noise sensitive activities will give rise to adverse reverse sensitivity effects on Wellington International Airport.</u>
Subdivision chapter / Subdivision / New SUB	Wellington Heritage Professionals	412.57	Support	Considers that the policy from the operative district plan should be added  [see original submission for full reasons]	Add a new policy as follows:  <i>"Protect the heritage values of listed buildings, objects, areas and scheduled archaeological sites by ensuring that the effects of subdivision and development on the same site as any listed building or object are avoided, remedied and mitigated"</i>
Subdivision chapter / Subdivision / SUB-O1	John Tiley	142.13	Amend	Considers that the focus of SUB-O1 is on efficient development but is silent on preservation of landscape amenity values. The objective is unbalanced should be rewritten.	Seeks that SUB-O1 (Efficient pattern of development) is rewritten to provide greater balance between efficient development and the preservation of landscape amenity values.  [Inferred decision requested].

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-O1	Churton Park Community Association	189.13	Amend	Considers that the focus of SUB-O1 is on efficient development but is silent on preservation of landscape amenity values. The objective is unbalanced should be rewritten.	Seeks that SUB-O1 (Efficient pattern of development) is rewritten to provide greater balance between efficient development and the preservation of landscape amenity values.  [Inferred decision requested].
Subdivision chapter / Subdivision / SUB-O1	Fire and Emergency New Zealand	273.105	Support	Supports the objective as it promotes adequate servicing of new subdivisions, including for water supply.	Retain SUB-O1 (Efficient pattern of development) as notified.
Subdivision chapter / Subdivision / SUB-O1	Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.20	Amend	Considers that Marshall's Ridge should be given protection through the strengthening of the objective.	Amend SUB-O1 (Efficient pattern of development) to give further protection to Marshall's Ridge and other ridgelines within the area.
Subdivision chapter / Subdivision / SUB-O1	Wellington Electricity Lines Limited	355.50	Not specified	Submitter is 'neutral' on provision.  SUB-O1 is supported in that the electricity distribution network is clearly identified as being associated with efficient development. However, the need for a separate definition for development infrastructure is still reflected in SUB-O1. It is because of this concern that position remains neutral to the objective as currently worded.	Not specified.
Subdivision chapter / Subdivision / SUB-O1	Waka Kotahi	370.191	Support in part	Supports with amendment.	Supports SUB-O1 (Efficient pattern of development) with amendment.
Subdivision chapter / Subdivision / SUB-O1	Waka Kotahi	370.192	Amend	Considers an additional outcome sought for subdivision activities to ensure that development considers land use and transport in an integrated manner throughout both the urban and rural areas as all development should consider the connections to the movement of people.	Amend Objective SUB-O1 (Efficient pattern of development) as follows: ... 6. The provision of electricity connections to the legal boundary or each allotment; and 7. Any consent notices, covenants, easements or other legal instruments necessary; and 8. Any potential adverse effects of site development on the efficient use and operation of the <u>roading and state highway network.</u>
Subdivision chapter / Subdivision / SUB-O1	WCC Environmental Reference Group	377.162	Support	This objective is in line with the overall strategic objectives of the plan, spatial plan and proposed Regional Policy Statement.	Retain SUB-O1 (Efficient pattern of development) as notified.
Subdivision chapter / Subdivision / SUB-O1	Kāinga Ora Homes and Communities	391.199	Support in part	Objective SUB-O1 is generally supported, but minor amendments are sought to recognise that the zone purpose, form and function along with amenity values will change overtime.	Retain Objective SUB-O1 (Efficient pattern of development) with amendment.
Subdivision chapter / Subdivision / SUB-O1	Kāinga Ora Homes and Communities	391.200	Amend	Considers that Objective SUB-O1 should be amended to recognise that the zone purpose, form and function along with amenity values will change overtime. This objective should align with Policy-5 that recognises the scale and intensity anticipated for the underlying zone.	Amend Objective SUB-O1 (Efficient pattern of development) as follows:  Subdivision achieves an efficient development pattern that:  1. Maintains or enhances Wellington's compact urban form; 2. Is compatible with the nature, scale and intensity anticipated for the underlying zone <del>and local context</del> ; 3. Enables flexibility, innovation and choice for appropriate future development and use of resulting land or buildings; and 4. Is supported by development infrastructure and additional infrastructure for existing and anticipated future activities.
Subdivision chapter / Subdivision / SUB-O1	Wellington International Airport Ltd	406.264	Oppose in part	Opposes SUB-O1.  [see paragraph 4.76 to 4.80 in original submission for full reason]	Opposes SUB-O1 (Efficient pattern of development) and seeks amendment.
Subdivision chapter / Subdivision / SUB-O1	Wellington International Airport Ltd	406.265	Amend	Opposes SUB-O1.  [see paragraph 4.76 to 4.80 in original submission for full reason]	Amend SUB-O1 (Efficient pattern of development) as follows:  ...  <u>5. Avoids development that is incompatible with regionally significant infrastructure.</u>

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Subdivision chapter / Subdivision / SUB-O1	KiwiRail Holdings Limited	408.97	Amend	Considers that subdivision, and associated land use development that subdivision enables, can compromise public safety and the safe operation of the rail network if inappropriately designed. KiwiRail seek amendment to SUB-O1 to recognise the value of the transport network, and the need to maintain the safety and efficiency of this network.	Amend SUB-O1 (Efficient pattern of development) as follows:  Subdivision achieves an efficient development pattern that: 1 Maintains or enhances Wellington's compact urban form; 2. Is compatible with the zone purpose, local context and associated amenity values; 3 Enables appropriate future development and use of resulting land or buildings; and 4 Is supported by development infrastructure and additional infrastructure for existing and anticipated future activities. <b>5. Maintains the safety and efficiency of the transport network.</b>
Subdivision chapter / Subdivision / SUB-O2	WCC Environmental Reference Group	377.163	Support	This objective recognises the importance of residents being able to access coastal and freshwater margins, and that in many areas such access doesn't exist, or is difficult.	Retain SUB-O2 (Esplanades) as notified.
Subdivision chapter / Subdivision / SUB-P1	Royal Forest and Bird Protection Society	345.256	Support	Supports the policy.	Retain SUB-P1 (Recognising and providing for subdivision) as notified.
Subdivision chapter / Subdivision / SUB-P1	WCC Environmental Reference Group	377.164	Support	SUB-S1 is supported as it helps give effect to the Subdivision objectives.	Retain SUB-P1 (Recognising and providing for subdivision) as notified.
Subdivision chapter / Subdivision / SUB-P1	Kāinga Ora Homes and Communities	391.201	Support	SUB-P1 is generally supported.	Retain SUB-P1 (Recognising and providing for subdivision) as notified.
Subdivision chapter / Subdivision / SUB-P2	Royal Forest and Bird Protection Society	345.257	Support	Supports the policy.	Retain SUB-P2 (Boundary adjustments and amalgamation) as notified.
Subdivision chapter / Subdivision / SUB-P2	WCC Environmental Reference Group	377.165	Support	SUB-P2 is important as it will help reduce barriers in situations where such re-adjustments can provide cost-effective ways of achieving better development patterns in the city.	Retain SUB-P2 (Boundary adjustments and amalgamation) as notified.
Subdivision chapter / Subdivision / SUB-P2	Kāinga Ora Homes and Communities	391.202	Support in part	SUB-P2 is generally supported with a minor amendment.	Retain SUB-P2 (Boundary adjustments and amalgamation) with amendment.
Subdivision chapter / Subdivision / SUB-P2	Kāinga Ora Homes and Communities	391.203	Amend	Considers SUB-P2 should be amended to recognise what is anticipated by the underlying zone.	Amend SUB-P2 (Boundary adjustments and amalgamation) as follows:  Enable boundary adjustments and site amalgamation to enhance the efficient use of land, provided that the nature and scale of resulting development potential is compatible with the <u>underlying zone</u> <del>local context</del> .
Subdivision chapter / Subdivision / SUB-P3	Trelissick Park Group	168.18	Support	Supports that SUB-P3 (Sustainable design) covers stormwater hydraulic neutrality and water sensitive design.	Retain SUB-P3 (Sustainable design) as notified.
Subdivision chapter / Subdivision / SUB-P3	Royal Forest and Bird Protection Society	345.258	Support	Supports the policy.	Retain SUB-P3 (Sustainable design) as notified.
Subdivision chapter / Subdivision / SUB-P3	Greater Wellington Regional Council	351.179	Support in part	Supports the direction in this policy, and its role as a matter of discretion throughout the subdivision chapter.	Retain SUB-P3 (Sustainable design), subject to amendments.



Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-P3	Greater Wellington Regional Council	351.180	Amend	<p>Considers that proposed RPS Change 1 (policy FW.2) seeks for District Plans to address water demand and include provisions to improve water efficiency. An additional subclause to SUB-P3 regarding encouraging efficient water use would have regard to this policy.</p> <p>The Wellington Regional Public Transport Plan 2021 states Greater Wellington will work with its regional partners to ensure new subdivisions can accommodate public transport.</p> <p>The policy wording can be strengthened for public transport to signal that subdivisions should be designed to ensure public transport routes can be provided for, and vehicles can access those routes.</p> <p>Proposed RPS Change 1 (Policies CC.3 and CC.9 in particular) seeks for District Plans to contribute to reduction in transport-related greenhouse gas emissions. Subdivision design can aid in reducing greenhouse gas emission through actions such as the use of renewable energy, providing infrastructure to enable the use of non-fossil fuel transport and reducing urban sprawl. Policy SUB-P3 should include the need for subdivision design to support greenhouse gas emission reductions</p>	<p>Amend wording in SUB-P3 (Sustainable design) to include 'provide for' public transport, encourage efficient water use and support greenhouse gas emission reductions as follows:</p> <p>...</p> <p><u>2a. Encourage the efficient use of water;</u></p> <p>...</p> <p>5. Support walking and cycling <u>opportunities</u>, and <u>provide for</u> public transport opportunities, and enhance neighbourhood and network connectivity and safety; <del>and</del></p> <p>6. Are adaptive to the effects of climate change. <del>And</del></p> <p><u>7. Support greenhouse gas emission reductions</u></p>
Subdivision chapter / Subdivision / SUB-P3	Waka Kotahi	370.193	Amend	<p>The submitter requests that an additional clause be added, providing for local and other centres in proposed subdivisions to support reduced reliance on private vehicle travel &amp; reduced emissions.</p> <p>Most large-scale subdivisions, whether it be brownfield or greenfield development, will still contribute to the vitality of the nearest commercial centre. As such, the proximity of the nearest centre should be considered across the board not just in new development areas.</p>	<p>Amend SUB-P3 (Sustainable design) as follows:</p> <p>...<u>7. Considers the ability of future residents to meet their day-today needs within the immediate area.</u></p>
Subdivision chapter / Subdivision / SUB-P3	WCC Environmental Reference Group	377.166	Support	<p>SUB-P3 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.</p>	<p>Retain SUB-P3 (Sustainable design) as notified.</p>
Subdivision chapter / Subdivision / SUB-P3	Kāinga Ora Homes and Communities	391.204	Support in part	<p>SUB-P3 is generally supported</p>	<p>Retain SUB-P3 (Sustainable design) with amendment.</p>
Subdivision chapter / Subdivision / SUB-P3	Kāinga Ora Homes and Communities	391.205	Amend	<p>Considers that SUB-P3 should be amended to provide the flexibility where practicable to achieve such outcomes as not all developments can achieve and attain all aspects in design and layout. Amendments also sought to remove reference to renewable energy as it is already captured under 'natural and physical resources.'</p>	<p>Amend SUB-P3 (Sustainable design) as follows:</p> <p><del>Provide Encourage and promote</del> <u>for</u> subdivision design and layout that makes efficient use of <del>renewable energy and other</del> natural and physical resources, and delivers well-connected, resilient communities including development patterns that:</p> <ol style="list-style-type: none"> <li>1. Maximise solar gain;</li> <li>2. Incorporate effective water sensitive design <u>where practicable</u>;</li> <li>3. <del>Achieve</del> <u>Provide for</u> hydraulic neutrality;</li> <li>4. Provide for safe vehicle access;</li> <li>5. Support walking, cycling and public transport opportunities and enhance neighbourhood and network connectivity and safety; and</li> <li>6. Are adaptive to the effects of climate change.</li> </ol>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-P3	KiwiRail Holdings Limited	408.98	Amend	<p>Considers that effective subdivision design can enable development that provides for the health and well-being of people and communities by managing reverse sensitivity effects on established uses. KiwiRail seek amendment to SUB-P3 to address the potential for adverse effects on the infrastructure, including the rail corridor. The addition of clause 7 ensures adverse effects of activities are rightfully considered at subdivision design stage. This also provides for consistency with Policy INF-P7 in the Infrastructure Chapter and ensures this policy is given effect to as intended.</p> <p>KiwiRail support policy for subdivision design to incorporate water sensitive design and to achieve hydraulic neutrality as provided in clause 2 and 3. KiwiRail seek to ensure neighbouring development does not result in stormwater discharge onto the rail corridor which can compromise the safe and efficient operation of the rail network.</p> <p>KiwiRail further support clause 4 that provides for subdivision with safe vehicle access. KiwiRail seek to ensure safety at rail level crossings is maintained.</p>	<p>Amend SUB-P3 (Sustainable design) as follows:</p> <p>Provide for subdivision design and layout that makes efficient use of renewable energy and other natural and physical resources, and delivers well-connected, resilient communities including development patterns that:</p> <ol style="list-style-type: none"> <li>1. Maximise solar gain;</li> <li>2. Incorporate effective water sensitive design;</li> <li>3. Achieve hydraulic neutrality;</li> <li>4. Provide for safe vehicle access;</li> <li>5. Support walking, cycling and public transport opportunities and enhance neighbourhood and network connectivity and safety; <del>and</del></li> <li>6. Are adaptive to the effects of climate change; <u>and</u></li> <li>7. <u>Manage adverse effects of activities through setbacks and design controls to achieve appropriate protection of infrastructure.</u></li> </ol>
Subdivision chapter / Subdivision / SUB-P4	Royal Forest and Bird Protection Society	345.259	Support	Supports the policy.	Retain SUB-P4 (Integration and layout of subdivision and development) as notified.
Subdivision chapter / Subdivision / SUB-P4	WCC Environmental Reference Group	377.167	Support	SUB-P4 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P4 (Integration and layout of subdivision and development) as notified.
Subdivision chapter / Subdivision / SUB-P4	Kāinga Ora Homes and Communities	391.206	Support	SUB-P4 is generally supported.	Retain SUB-P4 (Integration and layout of subdivision and development) as notified.
Subdivision chapter / Subdivision / SUB-P5	Peter Kelly	16.5	Amend	<p>Councillors have a democratic mandate to balance the interests of WCC residents against the important natural environment values represented by significant natural areas (SNAs). The Proposed Rules are essentially the Officer Draft Rules, but with the SNA designation removed from all residential zoned land.</p> <p>Requests that if SNAs are returned to residentially zoned land, the provisions in the draft District Plan are reinstated and fine-tuned.</p>	<p>If the Proposed District Plan is amended to allow Significant Natural Areas on residentially zoned land:</p> <p>Seeks that changes are made to SUB (Subdivision) to give effect to the following provision:</p> <p>Amend Draft District Plan SUB-P5 as follows: Provide for... "<u>and minimises vegetation clearance within Significant Natural Areas until 1 July 2027.</u>"</p>
Subdivision chapter / Subdivision / SUB-P5	Royal Forest and Bird Protection Society	345.260	Support	Supports the policy.	Retain SUB-P5 (Subdivision for residential activities) as notified.
Subdivision chapter / Subdivision / SUB-P5	WCC Environmental Reference Group	377.168	Support	SUB-P5 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P5 (Subdivision for residential activities) as notified.
Subdivision chapter / Subdivision / SUB-P5	Kāinga Ora Homes and Communities	391.207	Support	SUB-P5 is generally supported.	Retain SUB-P5 (Subdivision for residential activities) as notified.
Subdivision chapter / Subdivision / SUB-P6	Royal Forest and Bird Protection Society	345.261	Support	Supports the policy.	Retain SUB-P6 (Subdivision in the General Rural Zone) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-P6	Wellington Electricity Lines Limited	355.51	Support	Supports SUB-P6 to the extent that recognition and protection of lawfully established activities is provided for.  Regionally Significant Infrastructure (RSI) located within the Rural and future urban zones provides a critical service and is required to operate safely and efficiently. To ensure the efficient operation of RSI the adverse effects of reverse sensitivity need to be suitably recognised and provided for in the PDP, which this provision does.	Retain SUB-P6 (Subdivision in the General Rural Zone) as notified.
Subdivision chapter / Subdivision / SUB-P6	Waka Kotahi	370.194	Support	Supports matter 3. "Do not increase the risk of reverse sensitivity effects arising on existing lawfully established activities".	Retain SUB-P6 (Subdivision in the General Rural Zone) as notified.
Subdivision chapter / Subdivision / SUB-P6	WCC Environmental Reference Group	377.169	Support	SUB-P6 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P6 (Subdivision in the General Rural Zone) as notified.
Subdivision chapter / Subdivision / SUB-P6	Kāinga Ora Homes and Communities	391.208	Support	SUB-P6 is generally supported.	Retain SUB-P6 (Subdivision in the General Rural Zone) as notified.
Subdivision chapter / Subdivision / SUB-P7	Fire and Emergency New Zealand	273.106	Support	Supports the policy as it promotes suitable access and connections to the reticulated water supply. Where this is not possible, SUB-P7 expects allotments to accommodate on-site water supply for firefighting purposes. However, in order to ensure that the on-site location, capacity and access to such supply is adequate for FENZ to respond to a fire, it is necessary for the supply to be provided in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. It is acknowledged however that existing standard SUB-S2 requires all new allotments, created through subdivision, to comply with the Code so this policy, and associated standards, are fully supported	Retain SUB-P7 (Servicing) as notified.
Subdivision chapter / Subdivision / SUB-P7	Royal Forest and Bird Protection Society	345.262	Support	Supports the policy.	Retain SUB-P7 (Servicing) as notified.
Subdivision chapter / Subdivision / SUB-P7	Greater Wellington Regional Council	351.181	Support in part	Supports this requirement to connect to reticulated networks where available.	Retain SUB-P7 (Servicing), subject to amendments.
Subdivision chapter / Subdivision / SUB-P7	Greater Wellington Regional Council	351.182	Amend	Considers the PDP should provide for approved alternative wastewater systems anywhere where there are constraints on the existing network capacity, as well as where connections are not available. Septic tanks are excluded from this recommendation due to their known issues with leakage of untreated wastewater and nitrates, particularly when poorly maintained.  Providing for alternative wastewater treatment options aligns with recommendation 35 of Te Mahere Wai and gives effect to Te Mana o Te Wai. Alternative wastewater treatment options often reduce potable water use significantly. Reducing pressure of new development on the wastewater network may also make intensification in some areas with existing network capacity constraints more feasible.  Relevant direction from the operative RPS includes policies 16 and 45. Relevant direction from Proposed RPS Change 1 includes policies FW.2, FW.3 and FW.5, CC.14 and 42(r), FW.5 and 58. Regional plan rules would apply to discharges from all wastewater systems to manage potential impacts on groundwater and surface water quality, aquatic ecosystems and soil health. These requirements could feasibly be met by approved alternative wastewater systems in both brownfield development and greenfield development.	Amend SUB-P7 (Servicing) to include direction in the Subdivision chapter to provide for decentralised wastewater re-use and treatment (of grey and black water) and disposal using alternative wastewater systems (but not septic tanks due to their existing issues with contamination and leaching) anywhere where there are constraints on the existing network capacity, as well as where connections are not available. Where connections are available and there is network capacity, a connection to the wastewater network would still be required.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-P7	Greater Wellington Regional Council	351.183	Amend	<p>Considers the PDP should provide for approved alternative wastewater systems anywhere where there are constraints on the existing network capacity, as well as where connections are not available. Septic tanks are excluded from this recommendation due to their known issues with leakage of untreated wastewater and nitrates, particularly when poorly maintained.</p> <p>Providing for alternative wastewater treatment options aligns with recommendation 35 of Te Mahere Wai and gives effect to Te Mana o Te Wai. Alternative wastewater treatment options often reduce potable water use significantly. Reducing pressure of new development on the wastewater network may also make intensification in some areas with existing network capacity constraints more feasible.</p> <p>Relevant direction from the operative RPS includes policies 16 and 45. Relevant direction from Proposed RPS Change 1 includes policies FW.2, FW.3 and FW.5, CC.14 and 42(r), FW.5 and 58. Regional plan rules would apply to discharges from all wastewater systems to manage potential impacts on groundwater and surface water quality, aquatic ecosystems and soil health. These requirements could feasibly be met by approved alternative wastewater systems in both brownfield development and greenfield development.</p>	Seeks to include any necessary consequential amendments to provide this direction.
Subdivision chapter / Subdivision / SUB-P7	Wellington Electricity Lines Limited	355.52	Support in part	<p>Supports SUB-P7 to the extent that it is clear in that 'all allotments' (urban and rural) are to be adequately serviced by an electricity supply.</p> <p>Considers that the policy should be amended as infrastructure connectivity for 'Additional Infrastructure' should be recognised to the same extent of defined 'Development Infrastructure' at the policy level of the PDP.</p>	Retain SUB-P7 (Servicing) with amendment.
Subdivision chapter / Subdivision / SUB-P7	Wellington Electricity Lines Limited	355.53	Amend	<p>Considers that SUB-P7 should be amended so that infrastructure connectivity for 'Additional Infrastructure' is recognised to the same extent of defined 'Development Infrastructure' at the policy level of the PDP.</p>	<p>Amend SUB-P7 (Servicing) as follows:</p> <p>Require all allotments created by any subdivision to be adequately serviced such that:</p> <p>...                      3. <u>Suitable connections to telecommunications and electricity</u> are supplied.</p>
Subdivision chapter / Subdivision / SUB-P7	WCC Environmental Reference Group	377.170	Support	<p>SUB-P7 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.</p>	Retain SUB-P7 (Servicing) as notified.
Subdivision chapter / Subdivision / SUB-P7	Kāinga Ora Homes and Communities	391.209	Support	<p>SUB-P7 is generally supported.</p>	Retain SUB-P7 (Servicing) as notified.
Subdivision chapter / Subdivision / SUB-P8	Royal Forest and Bird Protection Society	345.263	Support	<p>Supports the policy.</p>	Retain SUB-P8 (Esplanade requirements) as notified.
Subdivision chapter / Subdivision / SUB-P8	WCC Environmental Reference Group	377.171	Support	<p>SUB-P8 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.</p>	Retain SUB-P8 (Esplanade requirements) as notified.
Subdivision chapter / Subdivision / SUB-P8	Kāinga Ora Homes and Communities	391.210	Support	<p>SUB-P8 is generally supported.</p>	Retain SUB-P8 (Esplanade requirements) as notified.
Subdivision chapter / Subdivision / SUB-P9	Royal Forest and Bird Protection Society	345.264	Support	<p>Supports the policy.</p>	Retain SUB-P9 (Subdivision of land within a site or area of significance to Māori Category A or B ) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-P9	WCC Environmental Reference Group	377.172	Support	SUB-P9 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P9 (Subdivision of land within a site or area of significance to Māori Category A or B) as notified.
Subdivision chapter / Subdivision / SUB-P9	Kāinga Ora Homes and Communities	391.211	Support	SUB-P9 is generally supported.	Retain SUB-P9 (Subdivision of land within a site or area of significance to Māori Category A or B) as notified.
Subdivision chapter / Subdivision / SUB-P9	Te Rūnanga o Toa Rangatira	488.55	Support in part	Supports the policy managing subdivision within Category A and B Sites and Areas of Significance to Maori.  [Inferred reason]	Retain SUB-P9 (Subdivision of land within a site or area of significance to Māori Category A or B) with amendments.
Subdivision chapter / Subdivision / SUB-P9	Te Rūnanga o Toa Rangatira	488.56	Amend	Considers that the policy could go further than presently drafted.  [Inferred reason]	Amend SUB-P9 (Subdivision of land within a site or area of significance to Māori Category A or B) by requiring partnership and engagement with mana whenua rather than just having regard to the extent of consultation with mana whenua.
Subdivision chapter / Subdivision / SUB-P10	Wellington City Council	266.97	Amend	Considers an additional matter should be included in SUB-P10 (Subdivision of land on which a heritage building or heritage structure is located) for consistency with SUB-P11 (Subdivision within heritage areas).	Amend SUB-P10 (Subdivision of land on which a heritage building or heritage structure is located) as follows:  Provide for the subdivision of land on which heritage buildings and heritage structures are located, having regard to: <u>a. The extent to which the subdivision and any anticipated development would detract from the identified heritage values;</u> <del>1-b.</del> The identified relationship and contribution of the setting and surroundings of the site to the values of the heritage building or heritage structure; <del>2-c.</del> The extent to which the subdivision would retain an appropriate setting for the heritage building or heritage structure; and <del>3-d.</del> Whether covenants or consent notices can be imposed on any new allotment to manage any anticipated development.
Subdivision chapter / Subdivision / SUB-P10	Royal Forest and Bird Protection Society	345.265	Support	Supports the policy.	Retain SUB-P10 (Subdivision of land on which a heritage building or heritage structure is located) as notified.
Subdivision chapter / Subdivision / SUB-P10	WCC Environmental Reference Group	377.173	Support	SUB-P10 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P10 (Subdivision of land on which a heritage building or heritage structure is located) as notified.
Subdivision chapter / Subdivision / SUB-P10	Kāinga Ora Homes and Communities	391.212	Support in part	SUB-P10 is generally supported, but an amendment is sought to remove reference to whether covenants or consent notices can be imposed on new allotment to manage any anticipated development.	Retain SUB-P10 (Subdivision of land on which a heritage building or heritage structure is located) with amendment.
Subdivision chapter / Subdivision / SUB-P10	Kāinga Ora Homes and Communities	391.213	Amend	Considers that SUB-P10 should be amended to remove reference to whether covenants or consent notices can be imposed on new allotment to manage any anticipated development. Anticipated development is provided for within the framework of the underlying zone and relevant district plan provisions, and covenants and consent notices are tools that are currently provided for when necessary and appropriate under current legislation.	Amend SUB-P10 (Subdivision of land on which a heritage building or heritage structure is located) as follows:  Provide for the subdivision of land on which heritage buildings and heritage structures are located, having regard to:  1. The identified relationship and contribution of the setting and surroundings of the site to the values of the heritage building or heritage structure; 2. The extent to which the subdivision would retain an appropriate setting for the heritage building or heritage structure; and <del>3. Whether covenants or consent notices can be imposed on any new allotment to manage any anticipated development.</del>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-P10	Wellington Heritage Professionals	412.58	Amend	Considers that advice from a qualified heritage professional, included in SUB-P12 (subdivision in archaeological sites), is also important to include as a point under the policies for sub-divisions involving heritage buildings and areas to ensure adverse effects are avoided or mitigated.	Amend policy SUB-P10 (Subdivision of land on which a heritage building or heritage structure is located) as follows:  Provide for the subdivision of land on which heritage buildings and heritage structures are located, having regard to:  1. The identified relationship and contribution of the setting and surroundings of the site to the values of the heritage building or heritage structure; 2. The extent to which the subdivision would retain an appropriate setting for the heritage building or heritage structure; <del>and</del> 3. Whether covenants or consent notices can be imposed on any new allotment to manage any anticipated development <del>and</del> ; 4. <u>The findings of any advice by a suitably qualified heritage professional;</u>
Subdivision chapter / Subdivision / SUB-P10	Wellington Heritage Professionals	412.59	Amend	Considers that consideration of any buildings and structures associated with the heritage values of the heritage building or structure should be considered.	Amend policy SUB-P10 (Subdivision of land on which a heritage building or heritage structure is located) as follows:  Provide for the subdivision of land on which heritage buildings and heritage structures are located, having regard to:  1. The identified relationship and contribution of <u>associated buildings and structures, of and</u> the setting and surroundings of the site to the values of the heritage building or heritage structure; 2. The extent to which the subdivision would retain an appropriate setting for the heritage building or heritage structure; and 3. Whether covenants or consent notices can be imposed on any new allotment to manage any anticipated development.
Subdivision chapter / Subdivision / SUB-P10	Wellington Heritage Professionals	412.60	Amend	Considers that there are no rules or standards to achieve the outcomes in SUB-P10 to 12.  [See original submission for full reasons]	Seeks that SUB-P10 (Subdivision of land on which a heritage building or heritage structure is located) be added as a restricted discretionary rule.
Subdivision chapter / Subdivision / SUB-P11	Royal Forest and Bird Protection Society	345.266	Support	Supports the policy.	Retain SUB-P11 (Subdivision within heritage areas) as notified.
Subdivision chapter / Subdivision / SUB-P11	WCC Environmental Reference Group	377.174	Support	SUB-P11 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P11 (Subdivision within heritage areas) as notified.
Subdivision chapter / Subdivision / SUB-P11	Kāinga Ora Homes and Communities	391.214	Support in part	SUB-P11 is generally supported, but an amendment is sought to remove reference to whether covenants or consent notices can be imposed on new allotment to manage any anticipated development, as consistent with the relief sought within this submission.	Retain SUB-P11 (Subdivision within heritage areas) with amendment.
Subdivision chapter / Subdivision / SUB-P11	Kāinga Ora Homes and Communities	391.215	Amend	Considers that SUB-P11 should be amended to remove reference to whether covenants or consent notices can be imposed on new allotment to manage any anticipated development, as consistent with the relief sought within this submission.	Amend SUB-P11 (Subdivision within heritage areas) as follows:  Provide for the subdivision of land within heritage areas, having regard to:  1. The extent to which the subdivision and any anticipated development would detract from the identified heritage values; and <del>2. Whether covenants or consent notices can be imposed on any new allotment to manage any anticipated development.</del>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-P11	Wellington Heritage Professionals	412.61	Amend	Considers that advice from a qualified heritage professional, included in SUB-P12 (subdivision in archaeological sites), is also important to include as a point under the policies for sub-divisions involving heritage buildings and areas to ensure adverse effects are avoided or mitigated.	Amend HH-P11 (Subdivision within heritage areas) as follows:  Provide for the subdivision of land within heritage areas, having regard to:  1. The extent to which the subdivision and any anticipated development would detract from the identified heritage values; <del>and</del> 2. Whether covenants or consent notices can be imposed on any new allotment to manage any anticipated development; <del>and</del> 3. <u>The findings of any advice by a suitably qualified heritage professional.</u>
Subdivision chapter / Subdivision / SUB-P11	Wellington Heritage Professionals	412.62	Amend	Considers that there are no rules or standards to achieve the outcomes in SUB-P10 to 12.  [See original submission for full reasons]	Seeks that SUB-P11 (Subdivision within heritage areas) be added as a restricted discretionary rule.
Subdivision chapter / Subdivision / SUB-P12	Royal Forest and Bird Protection Society	345.267	Support	Supports the policy.	Retain SUB-P12 (Subdivision of land containing a scheduled archaeological site) as notified.
Subdivision chapter / Subdivision / SUB-P12	WCC Environmental Reference Group	377.175	Support	SUB-P12 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P12 (Subdivision of land containing a scheduled archaeological site) as notified.
Subdivision chapter / Subdivision / SUB-P12	Kāinga Ora Homes and Communities	391.216	Support in part	SUB-P12 is generally supported, but an amendment is sought to remove reference to whether covenants or consent notices can be imposed on new allotment to manage any anticipated development, as consistent with the relief sought within this submission.	Retain SUB-P12 (Subdivision of land containing a scheduled archaeological site) with amendment.
Subdivision chapter / Subdivision / SUB-P12	Kāinga Ora Homes and Communities	391.217	Amend	Considers that SUB-P12 should be amended to remove reference to whether covenants or consent notices can be imposed on new allotment to manage any anticipated development, as consistent with the relief sought within this submission.	Amend SUB-P12 (Subdivision of land containing a scheduled archaeological site) as follows:  Provide for the subdivision of land containing a scheduled archaeological site, having regard to: ... 4. The outcomes of any consultation with Heritage New Zealand Pouhere Taonga; and <del>5. Whether controls such as covenants or consent notices can be imposed on any new allotment to manage anticipated development.</del>
Subdivision chapter / Subdivision / SUB-P12	Wellington Heritage Professionals	412.63	Support	Supports the inclusion of the outcomes of consultation with Heritage New Zealand Pouhere Taonga to ensure that any archaeological authority provisions are recognised.	Retain SUB-P12 (Subdivision of land containing a scheduled archaeological site) as notified.
Subdivision chapter / Subdivision / SUB-P12	Wellington Heritage Professionals	412.64	Amend	Considers that there are no rules or standards to achieve the outcomes in SUB-P10 to 12.  [See original submission for full reasons]	Seeks that SUB-P12 (Subdivision of land containing a scheduled archaeological site) be added as a restricted discretionary rule.
Subdivision chapter / Subdivision / SUB-P13	Royal Forest and Bird Protection Society	345.268	Support	Supports the policy.	Retain SUB-P13 (Subdivision of land containing a notable tree) as notified.
Subdivision chapter / Subdivision / SUB-P13	WCC Environmental Reference Group	377.176	Support	SUB-P13 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P13 (Subdivision of land containing a notable tree) as notified.
Subdivision chapter / Subdivision / SUB-P13	Kāinga Ora Homes and Communities	391.218	Support in part	SUB-P13 is generally supported, but an amendment is sought to remove reference to whether covenants or consent notices can be imposed on new allotment to manage any anticipated development, as consistent with the relief sought within this submission.	Retain SUB-P13 (Subdivision of land containing a notable tree) with amendment.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-P13	Kāinga Ora Homes and Communities	391.219	Amend	Considers that SUB-P13 should be amended to remove reference to whether covenants or consent notices can be imposed on new allotment to manage any anticipated development, as consistent with the relief sought within this submission.	Amend SUB-P13 (Subdivision of land containing a notable tree) as follows:  Require subdivision of land containing notable trees to support the maintenance of tree health and minimise the potential for interference, having regard to:  1. The extent to which the location of new boundaries relative to the notable tree and any anticipated development will increase the risk of the interference with property; <del>2. Whether controls such as consent notices or covenants can be imposed on any new allotment;</del> and <del>3. Whether site access and new utilities can be located outside of the root protection area of the notable tree.</del>
Subdivision chapter / Subdivision / SUB-P14	Royal Forest and Bird Protection Society	345.269	Support	Supports the policy.	Retain SUB-P14 (Subdivision within riparian margins) as notified.
Subdivision chapter / Subdivision / SUB-P14	Greater Wellington Regional Council	351.184	Oppose in part	Opposes the use of 'provide for' relating to subdivision in riparian margins. The proposed policy does not contribute to NATC-O1 to preserve and protect natural character within riparian margins from inappropriate subdivision.	Opposes SUB-P14 (Subdivision within riparian margins) and seeks amendment.
Subdivision chapter / Subdivision / SUB-P14	Greater Wellington Regional Council	351.185	Amend	Opposes the use of 'provide for' relating to subdivision in riparian margins. The proposed policy does not contribute to NATC-O1 to preserve and protect natural character within riparian margins from inappropriate subdivision.	Amend SUB-P14 (Subdivision within riparian margins) as follows:  <del>Provide for subdivision within riparian margins where:</del>  <del>1. The natural character is protected; and The subdivisions is designed to minimise the adverse effects of future use and development enabled by the subdivision on the natural character. Only allow for subdivision in riparian margins where adverse effect on natural character are avoided, and other adverse effects on natural character are avoided, remedied or mitigated.</del>
Subdivision chapter / Subdivision / SUB-P14	WCC Environmental Reference Group	377.177	Support	SUB-P14 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P14 (Subdivision within riparian margins) as notified.
Subdivision chapter / Subdivision / SUB-P15	Trelissick Park Group	168.19	Oppose	Considers that subdivision should not be allowed in significant natural areas.	Delete SUB-P15 (Protection of significant natural areas) as notified (as subdivision should not be allowed in significant natural areas).
Subdivision chapter / Subdivision / SUB-P15	Tyers Stream Group	221.67	Not specified	Considers that the main issue with the provision is that this has no effect in the absence of any SNAs on private residential land.	Not specified.
Subdivision chapter / Subdivision / SUB-P15	Tyers Stream Group	221.68	Not specified	Considers that avoid is a high bar for subdivision to cross, except for the 'where practicable'. The effects management hierarchy is very similar to that proposed in the NPSIB.	Seeks that accounting mechanism be developed if offsetting and compensation is contemplated and suggests this could be a fund to deliver more or better biodiversity elsewhere, on a 'net gain' basis.
Subdivision chapter / Subdivision / SUB-P15	Royal Forest and Bird Protection Society	345.270	Support in part	e introduction to this chapter states that it contains policies and rules that implement the objectives in the ECO chapter, where subdivision affects an SNA. We note that this chapter has taken the approach of replicating (although not exactly) some of the policies from the ECO chapter. An alternative approach would be to cross reference the EC policies in this chapter. Either can work, however, care needs to be taken to be clear which policies apply to subdivision, and to ensure that all relevant policies are included in the subdivision chapter. Because the ECO policies already apply to subdivision (e.g. ECO P1, P3) it may be simpler to cross reference the ECO policies in this subdivision chapter.	Amend SUB-P15 (Protection of significant natural areas) to refer to ECO policies to avoid repetition.  <u>Protect significant natural areas by applying ECO-P1, ECO-P3, ECO XX (re maintenance of biodiversity) and ECO P5.</u>



Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-P15	Royal Forest and Bird Protection Society	345.271	Support in part	If the replication approach is retained, there will also need to be replication of ECO P5, to ensure that the NZCPS is given effect to.	Amend SUB-P15 (Protection of significant natural areas) to align with relief sought on ECO policies:  Protect the biodiversity values of the identified significant natural areas within SCHED8 by requiring subdivision, use and development to: <ol style="list-style-type: none"> <li>1. Avoid adverse effects on indigenous biodiversity in the coastal environment to the extent stated in ECO P5 (or reference the replicated SUB policy);</li> <li>2. Avoid the following adverse effects on indigenous biodiversity values:                             <ol style="list-style-type: none"> <li>a. Loss of ecosystem representation and extent;</li> <li>b. Disruption to sequences, mosaics or ecosystem function;</li> <li>c. Fragmentation or loss of buffering or connectivity within the SNA and between other indigenous habitats and ecosystems; and</li> <li>d. A reduction in population size or occupancy of threatened species using the SNA for any part of their life cycle.</li> </ol> </li> <li>3. Avoid other adverse effects on indigenous biodiversity values where practicable;</li> <li>4. Minimise Mitigate adverse effects on the biodiversity values where avoidance is not practicable;</li> <li>5. Remedy adverse effects on the biodiversity values where they cannot be avoided or mitigated minimised;</li> <li>6. Only consider biodiversity offsetting for any residual adverse effects that cannot otherwise be avoided, mitigated minimised or remedied and where the principles of APP2 – Biodiversity Offsetting are met; and</li> <li>7. Only consider biodiversity compensation after first considering biodiversity offsetting and where the principles of APP2 – Biodiversity Compensation are met</li> </ol>
Subdivision chapter / Subdivision / SUB-P15	WCC Environmental Reference Group	377.178	Support	SUB-P15 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P15 (Protection of significant natural areas) as notified.
Subdivision chapter / Subdivision / SUB-P15	Director-General of Conservation	385.50	Support	Supports proposed Policy SUB-P15 (Protection of significant natural areas).	Retain policy SUB-P15 (Protection of significant natural areas) as notified.
Subdivision chapter / Subdivision / SUB-P16	Trelissick Park Group	168.20	Oppose	Considers that subdivision should not be allowed in significant natural areas.	Delete SUB-P16 (Subdivision in significant natural areas) as notified (as subdivision should not be allowed in significant natural areas).
Subdivision chapter / Subdivision / SUB-P16	Tyers Stream Group	221.69	Not specified	Considers that the main issue with the provision is that this has no effect in the absence of any SNAs on private residential land.	Not specified.
Subdivision chapter / Subdivision / SUB-P16	Royal Forest and Bird Protection Society	345.272	Support in part	Seeks to delete this policy, and include the following policy as a replacement for SUB P15 and P16: SUB P-15 Protection of, and subdivision in significant natural areas Protect significant natural areas by applying ECO-P1, ECO-P3, ECO XX (re maintenance of biodiversity) and ECO P5.	Delete SUB-P16 (Subdivision in significant natural areas) if cross reference policy relief is accepted for SUB-P15 (Protection of significant natural areas):  <u>Protect significant natural areas by applying ECO-P1, ECO-P3, ECO XX (re maintenance of biodiversity) and ECO P5.</u>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-P16	Royal Forest and Bird Protection Society	345.273	Support in part	If the replication approach is retained, we seek amendments as per our submission points on ECO P3. We also note that this policy is slightly different from ECO-P3. It is not clear why this is. While this policy includes considerations absent from ECO-P3 (which are supported), arguably this policy applies a lesser standard, in that all that is required is that certain things are taken into account – typically the extent to which something is provided. ECO- P3 in contrast requires e.g. ‘ensures that the ecological processes’ (ECO-P3.4). As such, we prefer the formulation from ECO-P3, and have added the relevant additional requirements parts from SUB P16 below. We would also accept different wording, as long as the wording is clear that certain things must be achieved, not simply taken into account, or required to an extent.	Amend SUB-P16 (Subdivision in significant natural areas):  Only allow for subdivision, use and development in significant natural areas listed in SCHED8 where it: 1. Applies the effects management hierarchy approach in SUB P15; and 2. Demonstrates that it is appropriate, including by taking into account the findings of an ecological assessment for the activity in accordance with APP15; and 3. Provides protective covenants of the significant natural area; 4. Minimises fragmentation of the significant natural area; 5. Locates building platforms and vehicle accessways within the new lots outside the significant natural area; and 6. Ensures the activities effects on biodiversity values are appropriately managed in accordance with the effects management hierarchy, and where residual effects remain after avoiding, remedying or mitigating, to achieve no net loss of biodiversity values of the identified significant natural area; and 7. Ensures that the ecological processes, functions and integrity of the significant natural area are maintained.
Subdivision chapter / Subdivision / SUB-P16	WCC Environmental Reference Group	377.179	Support	SUB-P16 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P16 (Subdivision in significant natural areas) as notified.
Subdivision chapter / Subdivision / SUB-P16	Director-General of Conservation	385.51	Support	Supports proposed Policy SUB-P16 (Subdivision in significant natural areas).	Retain policy SUB-P16 (Subdivision in significant natural areas) as notified.
Subdivision chapter / Subdivision / SUB-P17	John Tiley	142.14	Oppose	Oppose SUB-P17 (Subdivision of land within ridgeline and hilltops) as the concept of subdividing on ridgelines does a disservice to the city’s landscape values, expressed in other plans and policies over the last twenty years.	Not specified.
Subdivision chapter / Subdivision / SUB-P17	Churton Park Community Association	189.14	Oppose	Oppose SUB-17 as the concept of subdividing on ridgelines does a disservice to the city’s landscape values, expressed in other plans and policies over the last twenty years.	Not specified.
Subdivision chapter / Subdivision / SUB-P17	Heidi Snelson, Aman Hunt, Chia Hunt, Ela Hunt	276.21	Amend	Considers that Marshall's Ridge should be given protection through the strengthening of the policy.	Amend SUB-P17 (Subdivision of land within ridgeline and hilltops) to give further protection to Marshall's Ridge and other ridgelines within the area.
Subdivision chapter / Subdivision / SUB-P17	Royal Forest and Bird Protection Society	345.274	Support in part	Considers the policy broadly replicates NFL P2. We seek the same amendments sought for that policy here.	Amend SUB-P17 (Subdivision of land within ridgeline and hilltops) to align with relief sought on NFL-P2.
Subdivision chapter / Subdivision / SUB-P17	WCC Environmental Reference Group	377.180	Support	SUB-P17 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P17 (Subdivision of land within ridgeline and hilltops) as notified.
Subdivision chapter / Subdivision / SUB-P18	Royal Forest and Bird Protection Society	345.275	Support in part	Considers the policy broadly replicates NFL P3 and P4. We seek the same amendments sought for those policies here.	Amend SUB-P18 (Subdivision of land within special amenity landscapes) to align with relief sought on NFL-P3 and NFL-P4.
Subdivision chapter / Subdivision / SUB-P18	WCC Environmental Reference Group	377.181	Support	SUB-P18 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P18 (Subdivision of land within special amenity landscapes) as notified.
Subdivision chapter / Subdivision / SUB-P19	Royal Forest and Bird Protection Society	345.276	Support in part	Supports the intent of this policy but have concerns regarding “Only allow” wording in ONFLs. As per the submission points on SCHED10 and NFL-P5, opposes the use of “identified” given the shortcomings of SCHED10. Seeks the same amendments sought for that policy here.	Amend SUB-P19 (Subdivision of land within outstanding natural features and landscapes located outside of the coastal environment) to align with relief sought on NFL-P5.
Subdivision chapter / Subdivision / SUB-P19	WCC Environmental Reference Group	377.182	Support	SUB-P19 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P19 (Subdivision of land within outstanding natural features and landscapes located outside of the coastal environment) as notified.

# Subdivision

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-P20	Royal Forest and Bird Protection Society	345.277	Support in part	Considers the policy broadly replicates NFL P5. Seeks the same amendments sought for that policy here.	Amend SUB-P20 (Subdivision of land within outstanding natural features and landscapes located within the coastal environment) to align with relief sought on NFL-P5.
Subdivision chapter / Subdivision / SUB-P20	WCC Environmental Reference Group	377.183	Support	SUB-P20 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P20 (Subdivision of land within outstanding natural features and landscapes located within the coastal environment) as notified.
Subdivision chapter / Subdivision / SUB-P20	Director-General of Conservation	385.52	Support	Supports proposed Policy SUB-P20 (Subdivision of land within outstanding natural features and landscapes located within the coastal environment).	Retain policy SUB-P20 (Subdivision of land within outstanding natural features and landscapes located within the coastal environment) as notified.
Subdivision chapter / Subdivision / SUB-P21	Royal Forest and Bird Protection Society	345.278	Support in part	Considers the policy broadly replicates NFL P6. Seeks the same amendments sought for that policy here.	Amend SUB-P21 (Subdivision of land within the landward extent of the coastal environment) to align with relief sought on NFL-P6.
Subdivision chapter / Subdivision / SUB-P21	WCC Environmental Reference Group	377.184	Support	SUB-P21 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P21 (Subdivision of land within the landward extent of the coastal environment) as notified.
Subdivision chapter / Subdivision / SUB-P21	Director-General of Conservation	385.53	Support	Supports proposed Policy SUB-P21 (Subdivision of land within the landward extent of the coastal environment).	Retain policy SUB-P21 (Subdivision of land within the landward extent of the coastal environment) as notified.
Subdivision chapter / Subdivision / SUB-P22	Royal Forest and Bird Protection Society	345.279	Support in part	Considers the policy appears to replicate policy CE P5. Seeks the same amendments sought in relation to CE P5 to this policy.	Amend SUB-P22 (Subdivision of land within high coastal natural character areas) to align with relief sought on CE-P5.
Subdivision chapter / Subdivision / SUB-P22	WCC Environmental Reference Group	377.185	Support	SUB-P22 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P22 (Subdivision of land within high coastal natural character areas) as notified.
Subdivision chapter / Subdivision / SUB-P22	Director-General of Conservation	385.54	Support	Supports proposed Policy SUB-P22 (Subdivision of land within high coastal natural character areas).	Retain policy SUB-P22 (Subdivision of land within high coastal natural character areas) as notified.
Subdivision chapter / Subdivision / SUB-P23	Royal Forest and Bird Protection Society	345.280	Support in part	Considers the policy broadly replicates CE P6. Seeks the same amendments sought for that policy here.	Amend SUB-P23 (Subdivision of land within coastal margins and riparian margins in the coastal environment located inside the Port Zone, Airport Zone, Stadium Zone, Waterfront Zone or City Centre Zone) to align with relief sought on CE-P6.
Subdivision chapter / Subdivision / SUB-P23	WCC Environmental Reference Group	377.186	Support	SUB-P23 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P23 (Subdivision of land within coastal margins and riparian margins in the coastal environment located inside the Port Zone, Airport Zone, Stadium Zone, Waterfront Zone or City Centre Zone) as notified.
Subdivision chapter / Subdivision / SUB-P24	Royal Forest and Bird Protection Society	345.281	Support in part	Considers the policy broadly replicates CE P7. Seeks the same amendments sought for that policy here.	Amend SUB-P24 (Subdivision of land within coastal margins and riparian margins in the coastal environment located outside the Port Zone, Airport Zone, Stadium Zone, Waterfront Zone and City Centre Zone) to align with relief sought on CE-P7.
Subdivision chapter / Subdivision / SUB-P24	WCC Environmental Reference Group	377.187	Support	SUB-P24 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P24 (Subdivision of land within coastal margins and riparian margins in the coastal environment located outside the Port Zone, Airport Zone, Stadium Zone, Waterfront Zone and City Centre Zone) as notified.
Subdivision chapter / Subdivision / SUB-P25	Fire and Emergency New Zealand	273.107	Support	Supports the policy as it seeks to take a risk-based approach to the management of subdivision of land in locations where there is significant risk from natural hazards. This objective achieves the purpose of the RMA by providing for the safety and wellbeing of people and communities and addresses the risk to property across the city.	Retain SUB-P25 (Subdivision of land affected by natural hazards) as notified.
Subdivision chapter / Subdivision / SUB-P25	Toka Tū Ake EQC	282.13	Support	Supports this policy and the risk based approach to reducing natural hazard risk.	Retain SUB-P25 (Subdivision of land affected by natural hazards) as notified.
Subdivision chapter / Subdivision / SUB-P25	Royal Forest and Bird Protection Society	345.282	Support in part	Considers the policy broadly replicates CE P11. Seeks the same amendments sought for that policy here.	Amend SUB-P25 (Subdivision of land affected by natural hazards) to align with relief sought on CE-P11.
Subdivision chapter / Subdivision / SUB-P25	Greater Wellington Regional Council	351.186	Support	Considers this approach is appropriate.	Retain SUB-P25 (Subdivision of land affected by natural hazards) as notified.
Subdivision chapter / Subdivision / SUB-P25	WCC Environmental Reference Group	377.188	Support	SUB-P25 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P25 (Subdivision of land affected by natural hazards) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-P25	Kāinga Ora Homes and Communities	391.220	Support	SUB-P25 is generally supported.	Retain SUB-P25 (Subdivision that creates building platforms for hazard sensitive activities within the stream corridor of the Flood Hazard Overlay, the Wellington Fault Overlay, the Ohariu Fault Overlay or the high hazard area of the Coastal Hazard Overlays) as notified.
Subdivision chapter / Subdivision / SUB-P26	Toka Tū Ake EQC	282.14	Support	Supports this policy and the risk reduction measures being planned for in and around the port and railway areas of the Wellington Fault Overlay.	Retain SUB-26 (Subdivision of land within the port and railway yards within the Wellington Fault Overlay) as notified.
Subdivision chapter / Subdivision / SUB-P26	Royal Forest and Bird Protection Society	345.283	Support	Supports the policy.	Retain SUB-P26 (Subdivision of land within the port and railway yards within the Wellington Fault Overlay ) as notified.
Subdivision chapter / Subdivision / SUB-P26	Greater Wellington Regional Council	351.187	Amend	Considers it appropriate to make amendments to bring the policy in line with the Objectives 19 and 20 and Policies 51 and 52 in Proposed RPS Change 1. Minimise is defined as “as low as reasonably practicable (ALARP)” and is in line with standard risk-based hazard management approaches. This leaves room for reduction as far as practicable but is a clearer signal than reduce or do not increase, to actively look to bring down the risk in the design and planning of the development.	Amend SUB-P26 (Subdivision of land within the port and railway yards within the Wellington Fault Overlay) as follows: Require subdivision of land within the port and railway yards within the Wellington Fault Overlay to incorporate mitigation measures that minimise the <del>reduce or avoid an increase in</del> risk to people, property and infrastructure from the ground shaking and fault rupture on the Wellington Fault.
Subdivision chapter / Subdivision / SUB-P26	WCC Environmental Reference Group	377.189	Support	SUB-P26 is important as it signals the type of subdivision the city needs to improve its sustainability and liveability in support of subdivision objectives and policies.	Retain SUB-P26 (Subdivision of land within the port and railway yards within the Wellington Fault Overlay) as notified.
Subdivision chapter / Subdivision / SUB-P26	CentrePort Limited	402.110	Oppose	Opposes SUB-P26 because the policy doesn’t equate the process of subdivision per se which is not the land use or any structure which may be at increased risk from the Wellington Fault. This is included in the Natural Hazards chapter.	Delete SUB-P26 (Subdivision of land within the port and railway yards within the Wellington Fault Overlay) in its entirety.
Subdivision chapter / Subdivision / SUB-R1	Peter Kelly	16.6	Amend	Councillors have a democratic mandate to balance the interests of WCC residents against the important natural environment values represented by significant natural areas (SNAs). The Proposed Rules are essentially the Officer Draft Rules, but with the SNA designation removed from all residential zoned land.  Requests that if SNAs are returned to residentially zoned land, the provisions in the draft District Plan are reinstated and fine-tuned.	If the Proposed District Plan is amended to allow Significant Natural Areas on residentially zoned land:  Seeks that changes are made to SUB (Subdivision) to give effect to the following provision:  Amend Draft District Plan SUB-R1 as follows:  ... <b>8. Minimising vegetation loss within a Significant Natural Area.</b>
Subdivision chapter / Subdivision / SUB-R1	Chorus New Zealand Limited	88.1	Support	The SUB-R1 is supported as it ensures populations in the Medium Density Residential Zone and High Density Residential Zone have provision for fibre optic cables and continue to have access to world-class connectivity. If not provided at the time of subdivision, retroactively providing fibre optic cable connections can result in unnecessary and disruptive works and increased costs to the end user.	Retain SUB-R1 (Subdivision for the purpose of the construction and use of residential units in the Medium Density Residential Zone or High Density Residential Zone) as notified.
Subdivision chapter / Subdivision / SUB-R1	Rachel Marr	89.1	Oppose	Opposes the non-notification clauses under SUB-R1 on the basis that subdivision can cause problems and judicial review is often too late to rectify the issue.  Considers that an open policy that allows for the public to voice any concerns before the subdevelopment begins, would make it a smoother process during the subdevelopment and manage expectations.  [See original submission for further detail]	Seeks an amendment to SUB-R1 (Subdivision for the purpose of the construction and use of residential units in the Medium Density Residential Zone or High Density Residential Zone) for a more open process for consents with notification when neighbours will obviously be adversely affected by the work.
Subdivision chapter / Subdivision / SUB-R1	Design Network Architecture Limited	259.1	Amend	This rule has a notification preclusion relating to certain situations where there are 4 or more units complying with certain standards. For example, MRZ-S7 is a standard which specifically states it does not apply to multi-unit housing listed as a provision to be complied with for the notification preclusion for 4 or more units in SUB-R1, despite MRZ-S7 saying that it doesn't apply to multi-unit housing. This wording needs to be made clearer.	Seeks that SUB-R1 (Subdivision for the purpose of the construction and use of residential units in the Medium Density Residential Zone or High Density Residential Zone) is amended so that where a standard does not apply to multi-unit housing, it is not highlighted as being necessary to consider under a notification preclusion.
Subdivision chapter / Subdivision / SUB-R1	Wellington City Council	266.98	Oppose in part	Considers the rule does not have legal effect.	Remove the gavel for SUB-R1 (Subdivision for the purpose of the construction and use of residential units in the Medium Density Residential Zone or High Density Residential Zone)

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R1	Wellington City Council	266.99	Amend	Considers provisions relating to the consideration of 'any consent notices, covenants, easements or other legal instruments necessary' gives too much discretion to the assessment of controlled and restricted discretionary activities.	Delete below matter of control from rule SUB-R1.1.7 (Subdivision for the purpose of the construction and use of residential units in the Medium Density Residential Zone or High Density Residential Zone) as follows:  <del>Any consent notices, covenants, easements or other legal instruments necessary</del>
Subdivision chapter / Subdivision / SUB-R1	Fire and Emergency New Zealand	273.108	Support	Supports the rule as it controls the provision of water supply for subdivision for the purpose of establishing residential units in the Medium and High Density Residential zones. The matters of control include the provision of a water supply connection for each allotment that meets the requirements of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008, this is strongly supported by FENZ.	Retain SUB-R1 (Subdivision for the purpose of the construction and use of residential units in the Medium Density Residential Zone or High Density Residential Zone) as notified.
Subdivision chapter / Subdivision / SUB-R1	Retirement Villages Association of New Zealand Incorporated	350.65	Support	Supports SUB-R1 to the extent it reflects MDRS clause 3.	Retain SUB-R1 (Subdivision for the purpose of the construction and use of residential units in the Medium Density Residential Zone or High Density Residential Zone) as notified.
Subdivision chapter / Subdivision / SUB-R1	Greater Wellington Regional Council	350.66	Support in part	Supports permitted activity status for signs P-1's provisions for appropriate signs, but opposes signs being required to meet all of the matters contained in the list. For example, an entrance sign for a retirement village is required but it is not to meet a regulatory or statutory requirement.	Amend Sign-P1 so signs are not required to comply with all of the listed matters, particularly (4) and (7).
Subdivision chapter / Subdivision / SUB-R1	Wellington Electricity Lines Limited	355.54	Support in part	Supports SUB-R1 as the subdivision of land associated with medium and high density land use development is required to be a controlled activity.  Consideration of the NPSUD requirements is supported, with new records of title being certified under 223 and 224 of the RMA in conjunction with permitted development being controlled to the extent that a suitable connection to an electricity supply is provided.	Retain SUB-R1 (Subdivision for the purpose of the construction and use of residential units in the Medium Density Residential Zone or High Density Residential Zone) with amendment.
Subdivision chapter / Subdivision / SUB-R1	Wellington Electricity Lines Limited	355.55	Amend	Considers that SUB-R1 should be amended to be more robust regarding the degree of connection. As currently worded the Rule the "provision of electricity" does not instil an expectation that a safe and secure supply to an electricity supply network; but rather, merely that any given development has provision to the network. It is also noted that equipment is likely to also be required, which should be considered to facilitate the connection, not the development to an electricity supply.	Amend SUB-R1 (Subdivision for the purpose of the construction and use of residential units in the Medium Density Residential Zone or High Density Residential Zone) as follows: ... 6. <del>The provision of</del> <u>That connections to a safe and secure electricity supply network are provided</u> connections to the legal boundary <del>or</del> <u>of</u> each allotment; and ...
Subdivision chapter / Subdivision / SUB-R1	Waka Kotahi	370.195	Amend	Seeks an additional matter of control relating to the management of adverse effects on noise.	Amend SUB-R1 (Subdivision for the purpose of the construction and use of residential units in the Medium Density Residential Zone or High Density Residential Zone) as follows: ... 6. The provision of electricity connections to the legal boundary or each allotment; and 7. Any consent notices, covenants, easements or other legal instruments necessary.; and 8. Any potential adverse effects of site development on the efficient use and operation of the roading and state highway network.
Subdivision chapter / Subdivision / SUB-R1	WCC Environmental Reference Group	377.190	Support	SUB-R1 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R1 (Subdivision for the purpose of the construction and use of residential units in the Medium Density Residential Zone or High Density Residential Zone) as notified.
Subdivision chapter / Subdivision / SUB-R1	Kāinga Ora Homes and Communities	391.221	Support in part	SUB-R1 is generally supported, but amendments are sought in matters of control.	Retain SUB-R1 (Subdivision for the purpose of the construction and use of residential units in the Medium Density Residential Zone or High Density Residential Zone) with amendment.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R1	Kāinga Ora Homes and Communities	391.222	Amend	Considers that SUB-R1 should be amended so that its matters of control are more consistent with other rules and standards in the Subdivision chapter. This would also be more appropriate with standards that are required to be complied with.	Amend SUB-R1 (Subdivision for the purpose of the construction and use of residential units in the Medium Density Residential Zone or High Density Residential Zone) as follows:  1. Activity status: Controlled  Matters of control are: 1. The provision of practical, physical and legal access from each allotment directly to a formed legal road or by registered right of way; <u>2. Whether the subdivision necessitates a joint land use application.</u> <u>3. Compliance with SUB-S1, SUB-S2, SUB-S3, SUBS4, and SUB-S5</u> <del>2. The provision of a water supply connection to the Council's reticulated water supply system for each allotment sufficient to meet the levels of service in the Wellington Water Regional Standard for Water Services 2022 and the requirements of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008;</del> <del>3. The provision of a wastewater disposal connection to Council's reticulated wastewater system for each allotment sufficient to meet the level of service in the Wellington Regional Standard for Water Services 2022;</del> <del>4. The provision of a stormwater connection to Council's reticulated stormwater system for each allotment sufficient to meet the level of service in the Wellington Regional Standard for Water Services 2022;</del> <del>5. The provision of fibre optic cable connections to the legal boundary of each allotment;</del> <del>6. The provision of electricity connections to the legal boundary of each allotment; and</del> <del>7. Any consent notices, covenants, easements or other legal instruments necessary.</del> ...
Subdivision chapter / Subdivision / SUB-R1	Survey & Spatial New Zealand Wellington Branch	439.27	Amend	Considers that the notification status statement erroneously includes compliance with MRZ-S1 for subdivision for 4+ units when the standard only applies to subdivisions with 1-3 units.	Amend SUB-R1 (Subdivision for the purpose of the construction and use of residential units in the Medium Density Residential Zone or High Density Residential Zone) to:  Applications under this rule are precluded from being publicly notified or limited notified if the subdivision is only associated with residential units that fully comply with density standards MRZ-S1, <del>MRZ-S2</del> , MRZ-S3, MRZ-S4, MRZ-S5, MRZ-S6, MRZ-S7 and MRZ-S8 in the Medium Density Residential Zone; or HRZ-S1, HRZ-S3, HRZ-S4, <del>HRZ-S5</del> , HRZ-S6, HRZ-S7, HRZ-S8 and HRZ-S9 in the High Density Residential Zone.  Applications under this rule are precluded from being publicly or limited notified if the subdivision is associated with an application for the construction and use of 4 or more residential units that comply with density standards <del>MRZ-S4</del> , MRZ-S2, MRZ-S3, MRZ-S4, MRZ-S5, MRZ-S6, <del>MRZ-S7</del> and MRZ-S8 in the Medium Density Residential Zone; or HRZ-S1, HRZ-S3, HRZ-S4, HRZ-S5, HRZ-S6, HRZ-S7, <del>HRZ-S8</del> and HRZ-S9 in the High Density Residential Zone.
Subdivision chapter / Subdivision / SUB-R2	Wellington City Council	266.100	Amend	Considers provisions relating to the consideration of 'any consent notices, covenants, easements or other legal instruments necessary' gives too much discretion to the assessment of controlled and restricted discretionary activities.	Delete below matter of discretion from rule SUB-R2.2.4 (Subdivision around an existing lawfully established building which does not result in the creation of any new undeveloped allotment) as follows:  <del>Any consent notices, covenants, easements or other legal instruments necessary</del>
Subdivision chapter / Subdivision / SUB-R2	Fire and Emergency New Zealand	273.109	Support	Supports the rule subject to the relief sought regarding SUB-S1 and SUB-S2, which will ensure water supply and access matters are sufficiently addressed for all new allotments. FENZ considers this will help ensure the safety and wellbeing of life, property, and the environment in relation to fire risk. FENZ considers the matters of discretion for Restricted Discretionary activities for SUB-R2, provide Council with the necessary scope to consider firefighting water supply and access matters, through consideration of SUB-P7 and the extent and effect of non-compliance with any relevant standard.	Retain SUB-R2 (Subdivision around an existing lawfully established building which does not result in the creation of any new undeveloped allotment) as notified.  Support of this rule is subject to requested amendments to SUB-S1 and SUB-S2.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R2	WCC Environmental Reference Group	377.191	Support	SUB-R2 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R2 (Subdivision around an existing lawfully established building which does not result in the creation of any new undeveloped allotment) as notified.
Subdivision chapter / Subdivision / SUB-R2	Kāinga Ora Homes and Communities	391.223	Support in part	SUB-R2 is partially supported, with the expectation that it may be amended to fit with other proposed requirements. [Refer to original submission for full reason]	Retain SUB-R2 (Subdivision around an existing lawfully established building which does not result in the creation of any new undeveloped allotment), with conditional amendment. [Refer to original submission]
Subdivision chapter / Subdivision / SUB-R2	Survey & Spatial New Zealand Wellington Branch	439.28	Amend	Consider that all subdivision rules should include the ability to assess and claim existing use rights for standards that are not met for existing buildings or situations.	Amend SUB-R2 (Subdivision around an existing lawfully established building which does not result in the creation of any new undeveloped allotment) to:  c. The subdivision will not lead to, or increase the degree of, non-compliance with land use standards of the applicable Zone.
Subdivision chapter / Subdivision / SUB-R3	Rod Halliday	25.23	Amend	Considers that the 100m setback distance in SUB-R3.2 is arbitrary and may incur risks to the applicant.	Delete SUB-R3 (Boundary adjustments) 3.2.e in its entirety.
Subdivision chapter / Subdivision / SUB-R3	Wellington City Council	266.101	Amend	Considers provisions relating to the consideration of 'any consent notices, covenants, easements or other legal instruments necessary' gives too much discretion to the assessment of controlled and restricted discretionary activities.	Delete below matter of control/discretion from rule SUB-R3.2.5 (Boundary adjustments) and 3.3.8 as follows:  <del>Any consent notices, covenants, easements or other legal instruments necessary.</del>
Subdivision chapter / Subdivision / SUB-R3	Fire and Emergency New Zealand	273.110	Support	Supports the rule subject to the relief sought regarding SUB-S1 and SUB-S2, which will ensure water supply and access matters are sufficiently addressed for all new allotments as both a permitted and controlled activity.  Further, matters of control consider SUB-P7. FENZ considers this will help ensure the safety and wellbeing of life, property, and the environment in relation to fire risk. FENZ considers the matters of discretion for Restricted Discretionary activities for SUB-R3, provide Council with the necessary scope to consider firefighting water supply and access matters, through consideration of SUB-P7 and the extent and effect of non-compliance with any relevant standard.	Retain SUB-R3 (Boundary adjustments) as notified.
Subdivision chapter / Subdivision / SUB-R3	WCC Environmental Reference Group	377.192	Support	SUB-R3 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R3 (Boundary adjustments) as notified.
Subdivision chapter / Subdivision / SUB-R3	Kāinga Ora Homes and Communities	391.224	Support in part	SUB-R3 is partially supported, with the expectation that it may be amended to fit with other proposed requirements. [Refer to original submission for full reason]	Retain SUB-R3 (Boundary adjustments), with conditional amendment. [Refer to original submission]
Subdivision chapter / Subdivision / SUB-R3	Survey & Spatial New Zealand Wellington Branch	439.29	Amend	Considers that all subdivision rules should include the ability to assess and claim existing use rights for standards that are not met for existing buildings or situations.	Amend SUB-R3 (Boundary adjustments) to:  c. The subdivision will not lead to, or increase the degree of, non-compliance with land use standards of the applicable Zone.
Subdivision chapter / Subdivision / SUB-R4	Tyers Stream Group	221.70	Support in part	Supports in part the provision of a connection to the water reticulation network except that it does not fund the upgrade needed for that network to cope with extra capacity required for the series of new subdivision.	Retain SUB-S4 (Stormwater management) with amendment.
Subdivision chapter / Subdivision / SUB-R4	Wellington City Council	266.102	Amend	Considers provisions relating to the consideration of 'any consent notices, covenants, easements or other legal instruments necessary' gives too much discretion to the assessment of controlled and restricted discretionary activities.	Delete below matter of control/discretion from rule SUB-R4.1.3 and 4.2.4 (Subdivision to create a new allotment for infrastructure) as follows:  <del>Any consent notices, covenants, easements or other legal instruments necessary.</del>
Subdivision chapter / Subdivision / SUB-R4	Waka Kotahi	370.196	Support in part	Supports with amendments, noted below.	Supports with amendment, noted below.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R4	Waka Kotahi	370.197	Amend	The submitter concurs that subdivision for the sole purpose of providing infrastructure should be a controlled activity however, considers that this rule should reference that it must be sought by a Network Utility Operator and this rule should not be subject to SUB-S6 (minimum dimension size) as this would result in an unnecessary burden on acquiring sites to deliver necessary infrastructure outcomes. Non-compliance with SUB-R4 should be retained as a Restricted Discretionary activity	Amend SUB-R4 (Subdivision to create a new allotment for infrastructure) as follows:  Subdivision to create a new allotment for infrastructure  1. Activity status: Controlled  Where: a. <u>Subdivision is sought by a Network Utility Operator and</u> b. Compliance is achieved with the following standards for any balance allotment: i. SUB-S1; <u>and</u> ii. <del>SUB-S6</del> ; and SUB-S7.
Subdivision chapter / Subdivision / SUB-R4	WCC Environmental Reference Group	377.193	Support	SUB-R4 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R4 (Subdivision to create a new allotment for infrastructure) as notified.
Subdivision chapter / Subdivision / SUB-R4	Kāinga Ora Homes and Communities	391.225	Support in part	SUB-R4 is partially supported, with the expectation that it may be amended to fit with other proposed requirements. [Refer to original submission for full reason]	Retain SUB-R2 (Subdivision to create a new allotment for infrastructure), with conditional amendment. [Refer to original submission]
Subdivision chapter / Subdivision / SUB-R4	Wellington International Airport Ltd	406.266	Support	Supports SUB-R4.	Retain SUB-R4 (Subdivision to create a new allotment for infrastructure) as notified.
Subdivision chapter / Subdivision / SUB-R5	Wellington City Council	266.103	Amend	Considers provisions relating to the consideration of 'any consent notices, covenants, easements or other legal instruments necessary' gives too much discretion to the assessment of controlled and restricted discretionary activities.	Delete below matter of discretion from rule SUB-R5.2.7 (Subdivision that creates any vacant allotment) and 5.3.4 as follows:  <del>Any consent notices, covenants, easements or other legal instruments necessary</del>
Subdivision chapter / Subdivision / SUB-R5	Fire and Emergency New Zealand	273.111	Support	Supports the rule subject to the relief sought regarding SUB-S1 and SUB-S2, which will ensure water supply and access matters are sufficiently addressed for all new allotments as both a permitted and controlled activity. Further, matters of control consider SUB-P7. FENZ considers this will help ensure the safety and wellbeing of life, property, and the environment in relation to fire risk.	Retain SUB-R5 (Subdivision that creates any vacant allotment) as notified.
Subdivision chapter / Subdivision / SUB-R5	WCC Environmental Reference Group	377.194	Support	SUB-R5 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R5 (Subdivision that creates any vacant allotment) as notified.
Subdivision chapter / Subdivision / SUB-R5	Kāinga Ora Homes and Communities	391.226	Support in part	SUB-R5 is generally supported, but an amendment is sought to require a minimum shape standard for vacant lot subdivision to manage the creation of lot sizes that do not support the outcomes of the underlying zone.	Retain SUB-R5 (Subdivision that creates any vacant allotment), with amendment.
Subdivision chapter / Subdivision / SUB-R5	Kāinga Ora Homes and Communities	391.227	Amend	Considers that SUB-R5 should be amended so that the Discretionary Activity status is given when minimum lot size and shape standards are not met. This activity status is considered appropriate as vacant lot subdivision that does not meet proposed minimum lot size and shape should not be anticipated within the zone. A minimum shape standard should be provided for vacant lot subdivision to manage the creation of lot sizes that do not support the outcomes of the underlying zone. Proposed minimum lot size and shape are sought through amendments to SUB-S6.	Amend SUB-R5.4 (Subdivision that creates any vacant allotment) as follows:  4. Activity Status: Discretionary  where: a. The subdivision is not a controlled activity under SUB-R5.1 or a restricted discretionary activity under SUB-R5.2 or SUB-R5.3. ; b. <u>Compliance with SUB-S6 is not achieved.</u>
Subdivision chapter / Subdivision / SUB-R5	Survey & Spatial New Zealand Wellington Branch	439.30	Support	Supports SUB-R5.	Retain as notified.



Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R6	Fire and Emergency New Zealand	273.112	Amend	Supports the rule as it restricts subdivision of land. However, FENZ considers SUB-R6 does not provide appropriate consideration for the provision of services, particularly firefighting water supply and access to that supply. As such, FENZ seeks an amendment to SUB-R6 to provide Council with the discretion to consider these matters.	Support SUB-R6 (Subdivision of land within a site or area of significance to Māori Category A and B), with amendment.
Subdivision chapter / Subdivision / SUB-R6	Fire and Emergency New Zealand	273.113	Amend	Supports the rule as it restricts subdivision of land. However, FENZ considers SUB-R6 does not provide appropriate consideration for the provision of services, particularly firefighting water supply and access to that supply. As such, FENZ seeks an amendment to SUB-R6 to provide Council with the discretion to consider these matters.	Amend SUB-R6 (Subdivision of land within a site or area of significance to Māori Category A and B) as follows:  Matters of discretion: ...  1. The matters in SUB-P9-; and 2. The extent to which firefighting water supply, and access to that supply, has been provided in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008
Subdivision chapter / Subdivision / SUB-R6	WCC Environmental Reference Group	377.195	Support	SUB-R6 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R6 (Subdivision of land within a site or area of significance to Māori Category A and B ) as notified.
Subdivision chapter / Subdivision / SUB-R7	WCC Environmental Reference Group	377.196	Support	SUB-R7 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R7 (Subdivision of a site on which a scheduled heritage building or object is located) as notified.
Subdivision chapter / Subdivision / SUB-R8	WCC Environmental Reference Group	377.197	Support	SUB-R8 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R8 (Subdivision of a site within a heritage area) as notified.
Subdivision chapter / Subdivision / SUB-R9	WCC Environmental Reference Group	377.198	Support	SUB-R9 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R9 (Subdivision of a site on which a scheduled archaeological site is located) as notified.
Subdivision chapter / Subdivision / SUB-R10	WCC Environmental Reference Group	377.199	Support	SUB-R10 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R10 (Subdivision of a site on which a notable tree is located) as notified.
Subdivision chapter / Subdivision / SUB-R11	Fire and Emergency New Zealand	273.114	Support in part	Supports the rule as it restricts subdivision of land within a significant natural area. However, FENZ considers there is generally a heightened fire risk in more rural / vegetated areas, which is increasing overtime due to the effects of climate change. As such, FENZ considers it important that subdivisions within a significant natural area are provided with a sufficient firefighting water supply, including access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. FENZ considers this should apply to both reticulated and non-reticulated areas.	Supports SUB-R11 (Subdivision of land within a significant natural area), with amendment.
Subdivision chapter / Subdivision / SUB-R11	Fire and Emergency New Zealand	273.115	Amend	Supports the rule as it restricts subdivision of land within a significant natural area. However, FENZ considers there is generally a heightened fire risk in more rural / vegetated areas, which is increasing overtime due to the effects of climate change. As such, FENZ considers it important that subdivisions within a significant natural area are provided with a sufficient firefighting water supply, including access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. FENZ considers this should apply to both reticulated and non-reticulated areas.	Amend SUB-R11 (Subdivision of land within a significant natural area) as follows:  Matters of discretion:  1. The matters in SUB-P15 and 16624,SUB-P16-; and 2. The extent to which firefighting water supply, and access to that supply, has been provided in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R11	Royal Forest and Bird Protection Society	345.284	Support in part	Supports the requirement that the building platform be located outside the SNA for the RDA rule to apply. The RDA rule should also only apply where access to the building platform is also outside the SNA. The matters of discretion should be expanded to include ECO XX (re maintenance of biodiversity) and ECO P5, or their replicas in the SUB chapter (as sought above). Where the RDA requirements are not met, the activity should become non-complying	Amend SUB-R11 (Subdivision of land within a significant natural area):  1. Activity status: Restricted Discretionary Where: a. A future building platform to contain a residential unit is identified for each new undeveloped allotment that: i. Complies with the underlying zone provisions for buildings; and ii. Is located outside of the significant natural area.  Matters of discretion are: 1. The matters in SUB-P15 and 16624, SUB-P16. 2. The matters in ECO-P5 and ECO-PX (re: maintenance of biodiversity). ... 2. Activity status: <del>Discretionary</del> Non-complying
Subdivision chapter / Subdivision / SUB-R11	WCC Environmental Reference Group	377.200	Support	SUB-R11 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R11 (Subdivision of land within a significant natural area) as notified.
Subdivision chapter / Subdivision / SUB-R11	Director-General of Conservation	385.55	Support	Supports proposed Rule SUB-R11 (Subdivision of land within a significant natural area).	Retain rule SUB-R11 (Subdivision of land within a significant natural area) as notified.
Subdivision chapter / Subdivision / SUB-R12	Fire and Emergency New Zealand	273.116	Support in part	Supports the rule as it restricts subdivision of land within a significant natural area. However, FENZ considers there is generally a heightened fire risk in more rural / vegetated areas, which is increasing overtime due to the effects of climate change. As such, FENZ considers it important that subdivisions within a significant natural area are provided with a sufficient firefighting water supply, including access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. FENZ considers this should apply to both reticulated and non-reticulated areas.	Support SUB-R12 (Subdivision of land within significant amenity landscapes), with amendment.
Subdivision chapter / Subdivision / SUB-R12	Fire and Emergency New Zealand	273.117	Amend	Supports the rule as it restricts subdivision of land within a significant natural area. However, FENZ considers there is generally a heightened fire risk in more rural / vegetated areas, which is increasing overtime due to the effects of climate change. As such, FENZ considers it important that subdivisions within a significant natural area are provided with a sufficient firefighting water supply, including access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. FENZ considers this should apply to both reticulated and non-reticulated areas.	Amend SUB-R12 (Subdivision of land within significant amenity landscapes) as follows:  Matters of discretion:  1. The effects on the identified values of the special amenity landscape; <del>and</del> 2. The matters in SUB-P18; <u>and</u> 3. <u>The extent to which firefighting water supply, and access to that supply, has been provided in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008</u>
Subdivision chapter / Subdivision / SUB-R12	Royal Forest and Bird Protection Society	345.285	Support in part	Supports RD in SALs but seek that the matters of discretion be expanded to include NFL-P3 and NFL-P4 and cross reference new ECO and NFL policies sought above which are aimed at the maintenance of biodiversity outside of SNAs as well as ensuring policy 11 of the NZCPS is given effect to, outside of SNAs. Oppose the use of "identified" values as per our submission on SCHED11. Support discretionary status in 2.	Amend SUB-R12 (Subdivision of land within special amenity landscapes ):  1. Activity status: Restricted Discretionary Where: a. A future building platform to contain a residential unit is identified for each new undeveloped allotment that: i. complies with the underlying zone provisions for buildings.  Matters of discretion are: 1. The effects on the <del>identified</del> values of the special amenity landscape; and 2. The matters in SUB-P18 3. <u>The matters in NFL-P3, NFL-P4 [and ECO and NFL policies for maintenance of biodiversity outside SNAs and giving effect to Policy 11 of NZ Coastal Policy Statement]</u>
Subdivision chapter / Subdivision / SUB-R12	WCC Environmental Reference Group	377.201	Support	SUB-R12 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R12 (Subdivision of land within special amenity landscapes) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R13	Fire and Emergency New Zealand	273.118	Support in part	Supports the rule as it restricts subdivision of land within a significant natural area. However, FENZ considers there is generally a heightened fire risk in more rural / vegetated areas, which is increasing overtime due to the effects of climate change. As such, FENZ considers it important that subdivisions within a significant natural area are provided with a sufficient firefighting water supply, including access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. FENZ considers this should apply to both reticulated and non-reticulated areas.	Retain SUB-R13 (Subdivision of land within outstanding natural features and landscapes), with amendment.
Subdivision chapter / Subdivision / SUB-R13	Fire and Emergency New Zealand	273.119	Amend	Supports the rule as it restricts subdivision of land within a significant natural area. However, FENZ considers there is generally a heightened fire risk in more rural / vegetated areas, which is increasing overtime due to the effects of climate change. As such, FENZ considers it important that subdivisions within a significant natural area are provided with a sufficient firefighting water supply, including access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. FENZ considers this should apply to both reticulated and non-reticulated areas.	Amend SUB-R13 (Subdivision of land within outstanding natural features and landscapes) as follows:  Matters of discretion:  1. The matters in SUB-P19 and SUB-P20; <del>and</del> 2. The effects on the identified values of the outstanding natural features or landscapes; <u>and</u> 3. <u>The extent to which firefighting water supply, and access to that supply, has been provided in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008</u>
Subdivision chapter / Subdivision / SUB-R13	Royal Forest and Bird Protection Society	345.286	Support in part	Supports the requirement that the future building platform is located outside of the outstanding natural feature or landscape. Considers this should be extended to also require that the access to the building platform is outside of the ONFL as well. Seeks that the matters of discretion for RDA refer to policies aimed at protecting ONFLs and the indigenous biodiversity located within them, including new ECO and NFL policies sought by F&B which are aimed at the maintenance of biodiversity outside of SNAs. Support Discretionary and Non-Complying status.	Amend SUB-R13 (Subdivision of land within outstanding natural features and landscapes):  1. Activity status: Restricted Discretionary Where: a. A future building platform to contain a residential unit <u>and access</u> is identified for each new undeveloped allotment that: i. complies with the underlying zone provisions for buildings; and ii. is located outside of the outstanding natural feature or landscape.  Matters of discretion are restricted to: 1. The matters in SUB-P19 and SUB-P20; and 2. The effects on the identified values of the outstanding natural features or landscapes. 3. <u>[Insert ECO and NFL policies for maintenance of biodiversity outside SNAs]</u>
Subdivision chapter / Subdivision / SUB-R13	WCC Environmental Reference Group	377.202	Support	SUB-R13 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R13 (Subdivision of land within outstanding natural features and landscapes) as notified.
Subdivision chapter / Subdivision / SUB-R14	Fire and Emergency New Zealand	273.120	Support in part	Supports the rule s it restricts the subdivision of land within Coastal Environment, Coastal Hazard Overlays, or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault or Terawhiti Fault Overlays. FENZ seeks an additional matter of discretion requiring sufficient firefighting water supply, including access to that supply, to be provided in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. FENZ considers this should apply to both reticulated and non-reticulated areas.	Supports SUB-R14 (Subdivision of land within the coastal environment outside of high coastal natural character areas and outside of coastal margins and riparian margins), with amendment.
Subdivision chapter / Subdivision / SUB-R14	Fire and Emergency New Zealand	273.121	Amend	Supports the rule s it restricts the subdivision of land within Coastal Environment, Coastal Hazard Overlays, or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault or Terawhiti Fault Overlays. FENZ seeks an additional matter of discretion requiring sufficient firefighting water supply, including access to that supply, to be provided in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. FENZ considers this should apply to both reticulated and non-reticulated areas.	Amend SUB-R14 (Subdivision of land within the coastal environment outside of high coastal natural character areas and outside of coastal margins and riparian margins) as follows:  Matters of discretion:  1. The matters in PA-P1, SUB-P8 and SUB-P21; <u>and</u> 2. <u>The extent to which firefighting water supply, and access to that supply, has been provided in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R14	Royal Forest and Bird Protection Society	345.287	Oppose in part	<p>Considers that provisions which only protect areas of high natural character do not give effect to NZCPS policy 13. As such, we oppose the controlled rule, which would not allow the Council the ability to decline consent where there were significant adverse effects.</p> <p>In that context, RD is more appropriate. Ensure that the matters of discretion refer to policies aimed at protecting natural character, not only those concerning esplanade strips (SUB P8) and urban sprawl (SUB P21)</p>	<p>Amend SUB-R14 (Subdivision of land within the coastal environment outside of high coastal natural character areas and outside of coastal margins and riparian margins ):</p> <p>1. Activity status: <del>Controlled</del> <u>Restricted Discretionary</u></p> <p>Where:</p> <p>a. The subdivision is not located in any Open Space and Recreation Zone or the General Rural Zone; and</p> <p>b. Compliance is achieved with the following standards:</p> <p>i. SUB-S6; and</p> <p>ii. SUB-S7.</p> <p>Matters of <del>control</del> <u>discretion</u> are: The matters in PA-P1, SUB-P8 and SUB-P21, and <u>[insert references to policies that protect natural character]</u></p>
Subdivision chapter / Subdivision / SUB-R14	WCC Environmental Reference Group	377.203	Support	SUB-R14 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R14 (Subdivision of land within the coastal environment outside of high coastal natural character areas and outside of coastal margins and riparian margins ) as notified.
Subdivision chapter / Subdivision / SUB-R15	Fire and Emergency New Zealand	273.122	Support in part	Supports the rule s it restricts the subdivision of land within Coastal Environment, Coastal Hazard Overlays, or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault or Terawhiti Fault Overlays. FENZ seeks an additional matter of discretion requiring sufficient firefighting water supply, including access to that supply, to be provided in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. FENZ considers this should apply to both reticulated and non-reticulated areas.	Supports SUB-R15 (Subdivision of land within the coastal environment within coastal margins or riparian margins), with amendment.
Subdivision chapter / Subdivision / SUB-R15	Fire and Emergency New Zealand	273.123	Amend	Supports the rule s it restricts the subdivision of land within Coastal Environment, Coastal Hazard Overlays, or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault or Terawhiti Fault Overlays. FENZ seeks an additional matter of discretion requiring sufficient firefighting water supply, including access to that supply, to be provided in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. FENZ considers this should apply to both reticulated and non-reticulated areas.	<p>Amend SUB-R15 (Subdivision of land within the coastal environment within coastal margins or riparian margins) as follows:</p> <p>Matters of discretion:</p> <p>2. Any measures proposed to protect the natural character values of the area, including the location and size of future building platforms; <del>and</del></p> <p>3. The matters in SUB-P14, SUB-P21, SUB-P24, PA-P1, PA-P2 and PA-P3; <del>and</del></p> <p>4. <u>The extent to which firefighting water supply, and access to that supply, has been provided in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>
Subdivision chapter / Subdivision / SUB-R15	Royal Forest and Bird Protection Society	345.288	Oppose in part	Opposes controlled status for this activity. As submitted in the Coastal Environment chapter, the requirement to protect natural character applies regardless of zoning. Ensure that the matters of discretion for the RDA refer to policies aimed at protecting natural character.	<p>Amend SUB-R15 (Subdivision of land within the coastal environment within coastal margins or riparian margins):</p> <p>1. Activity status: <del>Controlled</del> <u>Restricted Discretionary</u></p> <p>Where: <del>The subdivision is located in the Port Zone, Airport Zone, Stadium Zone, Waterfront Zone or City-Centre Zone</del></p> <p>Matters of <del>control</del> <u>discretion</u> are:</p> <p>1. The effect on coastal margins and riparian margins;</p> <p>2. Any measures proposed to protect the natural character values of the area, including the location and size of future building platforms; and</p> <p>3. The matters in SUB-P14, SUB-P21, SUB-P23, PA-P1, PA-P2 and PA-P3, <u>and [insert references to policies that protect natural character].</u></p>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R15	WCC Environmental Reference Group	377.204	Support	SUB-R15 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R15 (Subdivision of land within the coastal environment within coastal margins or riparian margins) as notified.
Subdivision chapter / Subdivision / SUB-R15	Director-General of Conservation	385.56	Support	Supports proposed Rule SUB-R15 (Subdivision of land within the coastal environment within coastal margins or riparian margins).	Retain rule SUB-R15 (Subdivision of land within the coastal environment within coastal margins or riparian margins) as notified.
Subdivision chapter / Subdivision / SUB-R16	Fire and Emergency New Zealand	273.124	Support in part	Supports the rule s it restricts the subdivision of land within Coastal Environment, Coastal Hazard Overlays, or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault or Terawhiti Fault Overlays. FENZ seeks an additional matter of discretion requiring sufficient firefighting water supply, including access to that supply, to be provided in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. FENZ considers this should apply to both reticulated and non-reticulated areas.	Supports SUB-R16 (Subdivision of land within the coastal environment within high coastal natural character areas), with amendment.
Subdivision chapter / Subdivision / SUB-R16	Fire and Emergency New Zealand	273.125	Amend	Supports the rule s it restricts the subdivision of land within Coastal Environment, Coastal Hazard Overlays, or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault or Terawhiti Fault Overlays. FENZ seeks an additional matter of discretion requiring sufficient firefighting water supply, including access to that supply, to be provided in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. FENZ considers this should apply to both reticulated and non-reticulated areas.	Amend SUB-R16 (Subdivision of land within the coastal environment within high coastal natural character areas) as follows:  Matters of discretion:  2. Any measures proposed to protect the natural character values of the area, including the location and size of future building platforms; and- 3. The matters in SUB-P14, SUB-P21, SUB-P22, PA-P1, PA-P2 and PA-P3; and 4. The extent to which firefighting water supply, and access to that supply, has been provided in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008
Subdivision chapter / Subdivision / SUB-R16	Royal Forest and Bird Protection Society	345.289	Support in part	Supports the requirement that the building platform is outside the high natural character area. Considers this should be extended to also require that the access to the building platform is outside the high natural character area.  Also seeks that this rule is extended to apply to all areas of natural character in the coastal environment.  Considers matters of discretion must refer to policies aimed at the protection of natural character.  Supports non-complying status.	Amend SUB-R16 (Subdivision of land within the coastal environment within high coastal natural character areas):  Activity status: Restricted Discretionary Where: A future building platform to contain a residential unit and an access is identified for each new undeveloped allotment that: complies with the underlying zone provisions for buildings; and is located outside of the high coastal natural character area.  Matters of discretion are: 1. The effects on the identified coastal natural character values; 2. Any measures proposed to protect the natural character values of the area, including the location and size of future building platforms; and 3. The matters in SUB-P14, SUB-P21, SUB-P22, PA-P1, PA-P2 and PA-P3 and [insert references to policies that protect natural character].
Subdivision chapter / Subdivision / SUB-R16	WCC Environmental Reference Group	377.205	Support	SUB-R16 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R16 (Subdivision of land within the coastal environment within high coastal natural character areas) as notified.
Subdivision chapter / Subdivision / SUB-R16	Director-General of Conservation	385.57	Support	Supports proposed Rule SUB-R16 (Subdivision of land within the coastal environment within high coastal natural character areas).	Retain rule SUB-R16 (Subdivision of land within the coastal environment within high coastal natural character areas) as notified.
Subdivision chapter / Subdivision / SUB-R17	Wellington City Council	266.104	Amend	Considers provisions relating to the consideration of 'any consent notices, covenants, easements or other legal instruments necessary' gives too much discretion to the assessment of controlled and restricted discretionary activities.	Delete below matter of control/discretion from rule SUB-R17.2.3 (Subdivision that creates building platforms for less hazard sensitive activities within the low, medium or high hazard areas of the Coastal Hazard Overlays or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault or Terawhiti Fault Overlays) and 17.1.3 as follows:  <del>Any consent notices, covenants, easements or other legal instruments necessary</del>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R17	Fire and Emergency New Zealand	273.126	Amend	Supports the rule s it restricts the subdivision of land within Coastal Environment, Coastal Hazard Overlays, or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault or Terawhiti Fault Overlays. FENZ seeks an additional matter of discretion requiring sufficient firefighting water supply, including access to that supply, to be provided in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. FENZ considers this should apply to both reticulated and non-reticulated areas.	Supports SUB-R17 (Subdivision that creates building platforms for less hazard sensitive activities within the low, medium, or high hazard areas of the Coastal Hazard Overlays or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault, or Terawhiti Fault Overlays) with amendment.
Subdivision chapter / Subdivision / SUB-R17	Fire and Emergency New Zealand	273.127	Amend	Supports the rule s it restricts the subdivision of land within Coastal Environment, Coastal Hazard Overlays, or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault or Terawhiti Fault Overlays. FENZ seeks an additional matter of discretion requiring sufficient firefighting water supply, including access to that supply, to be provided in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008. FENZ considers this should apply to both reticulated and non-reticulated areas.	Amend SUB-R17 (Subdivision that creates building platforms for less hazard sensitive activities within the low, medium, or high hazard areas of the Coastal Hazard Overlays or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault, or Terawhiti Fault Overlays) as follows:  Matters of discretion:  2. Site access and the design of any vehicle parking and associated maneuvering areas proposed; <del>and</del> 3. Any consent notices, covenants, easements or other legal instruments necessary; <del>and</del> 4. <u>The extent to which firefighting water supply, and access to that supply, has been provided in accordance with New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008</u>
Subdivision chapter / Subdivision / SUB-R17	Greater Wellington Regional Council	351.188	Amend	Considers where the activity does not comply with Rule SUB-R17.1.b, i.e. the building platform is within a stream corridor, a non-complying activity status is more appropriate instead of discretionary as proposed in the notified rule. Non-complying activity status allows full scrutiny of the application as part of the consent process and sends a message to applicants that consents generally will not be granted.	Amend SUB-R17.1 (Subdivision that creates building platforms for less hazard sensitive activities within the low, medium or high hazard areas of the Coastal Hazard Overlays or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault or Terawhiti Fault Overlays) as follows:  1. Activity status: <del>Controlled</del> <u>Non-Complying</u> ... Retain SUB-R17 (Subdivision that creates building platforms for less hazard sensitive activities within the low...) as notified.
Subdivision chapter / Subdivision / SUB-R17	WCC Environmental Reference Group	377.206	Support	SUB-R17 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R17 (Subdivision that creates building platforms for less hazard sensitive activities within the low...) as notified.
Subdivision chapter / Subdivision / SUB-R17	Kāinga Ora Homes and Communities	391.228	Oppose in part	Opposes the inclusion of flood hazard overlays and the reference to 'Any consent notices, covenants, easements or other legal instruments necessary' in the District Plan and District Plan maps and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	Opposes in part SUB-R17 (Subdivision that creates building platforms for less hazard sensitive activities within the low, medium or high hazard areas of the Coastal Hazard Overlays or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault or Terawhiti Fault Overlays) and seeks amendment.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R17	Kāinga Ora Homes and Communities	391.229	Amend	Opposes the inclusion of flood hazard overlays and the reference to 'Any consent notices, covenants, easements or other legal instruments necessary' in the District Plan and District Plan maps and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	Amend SUB-R17 (Subdivision that creates building platforms for less hazard sensitive activities within the low, medium or high hazard areas of the Coastal Hazard Overlays or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault or Terawhiti Fault Overlays) as follows:  1. Activity status: Controlled  where: a. The building platform is not located within an identified overland flowpath <del>of the Flood Hazard Overlay; and/or</del> b. The building platform is not located within a stream corridor <del>of the Flood Hazard Overlay.</del>  Matters of control are: ... <del>3. Any consent notices, covenants, easements or other legal instruments necessary.</del>  2. Activity Status: Restricted Discretionary ... <del>3. Any consent notices, covenants, easements or other legal instruments necessary; and</del>
Subdivision chapter / Subdivision / SUB-R17	Wellington International Airport Ltd	406.267	Oppose	Opposes these provisions as it is not clear the circumstances where building platforms will be required to be identified as part of subdivision consent. This is inappropriate within the Airport Zone given the size of the land parcels and nature of the activities that are accommodated on site, even where the activity is for hazard sensitive or potentially hazard sensitive activities.  [See paragraphs 4.76 to 4.80 in original submission for further detail.]	Seeks that SUB-R17 (Subdivision that creates building platforms for less hazard sensitive activities within the low, medium or high hazard areas of the Coastal Hazard Overlays or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault or Terawhiti Fault Overlays) is amended to provide clarification around the requirement for building platforms, and provide that building platforms are not required at the time of subdivision within the Airport Zone.
Subdivision chapter / Subdivision / SUB-R17	Wellington International Airport Ltd	406.268	Amend	Opposes these provisions as it is not clear the circumstances where building platforms will be required to be identified as part of subdivision consent. This is inappropriate within the Airport Zone given the size of the land parcels and nature of the activities that are accommodated on site, even where the activity is for hazard sensitive or potentially hazard sensitive activities.  [See paragraphs 4.76 to 4.80 in original submission for further detail.]	Seeks that SUB-R17 (Subdivision that creates building platforms for less hazard sensitive activities within the low, medium or high hazard areas of the Coastal Hazard Overlays or within the Flood Hazard, Liquefaction, Wellington Fault, Ohariu Fault, Sheppards Fault or Terawhiti Fault Overlays) is amended to provide clarification around the requirement for building platforms, and provide that building platforms are not required at the time of subdivision within the Airport Zone.
Subdivision chapter / Subdivision / SUB-R18	Wellington City Council	266.105	Amend	Considers provisions relating to the consideration of 'any consent notices, covenants, easements or other legal instruments necessary' gives too much discretion to the assessment of controlled and restricted discretionary activities.	Delete below matter of control from rule SUB-R18.1.1c (Subdivision that creates building platforms for potentially hazard sensitive activities within the low hazard area of the Coastal Hazard Overlays, or within the inundation area of the Flood Hazard Overlay, or within the Liquefaction, Sheppards Fault or Terawhiti Fault Overlays) as follows:  <del>Any consent notices, covenants, easements or other legal instruments necessary</del>
Subdivision chapter / Subdivision / SUB-R18	Poneke Architects	292.3	Oppose	Opposes the Coastal Environment provisions in relation to subdivision as these are too broad and will effectively stop development in Wellington.	Delete references to the Coastal Environment in SUB-R18 (Subdivision of land in special amenity landscapes). [Inferred decision requested]
Subdivision chapter / Subdivision / SUB-R18	Greater Wellington Regional Council	351.189	Amend	Considers it is appropriate to require resource consent for subdivisions that create building platforms associated with potentially hazard sensitive activities within the inundation area of the Flood Hazard Overlay. However, the activity status should be restricted discretionary, not controlled. Restricted discretionary activity status gives Council the ability to decline an application if it is considered inappropriate or the mitigation measures are inadequate. The matter listed under SUB-R18 (2) is considered appropriate for restricted activity status.	Amend SUB-R18. (Subdivision that creates building platforms for potentially hazard sensitive activities within the low hazard area of the Coastal Hazard Overlays, or within the inundation area of the Flood Hazard Overlay, or within the Liquefaction, Sheppards Fault or Terawhiti Fault Overlays) as follows:  1. Activity status: Controlled <u>Restricted Discretionary</u> ...

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R18	WCC Environmental Reference Group	377.207	Support	SUB-R18 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R18 (Subdivision that creates building platforms for potentially hazard sensitive activities within the low...) as notified.
Subdivision chapter / Subdivision / SUB-R18	Kāinga Ora Homes and Communities	391.230	Oppose in part	Opposes the inclusion of flood hazard overlays and the reference to 'Any consent notices, covenants, easements or other legal instruments necessary' in the District Plan and District Plan maps and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	Opposes in part SUB-R18 (Subdivision that creates building platforms for potentially hazard sensitive activities within the low hazard area of the Coastal Hazard Overlays, or within the inundation area of the Flood Hazard Overlay, or within the Liquefaction, Sheppards Fault or Terawhiti Fault Overlays) and seeks amendments.
Subdivision chapter / Subdivision / SUB-R18	Kāinga Ora Homes and Communities	391.231	Amend	Opposes the inclusion of flood hazard overlays and the reference to 'Any consent notices, covenants, easements or other legal instruments necessary' in the District Plan and District Plan maps and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	Seeks amendments to SUB-R18 (Subdivision that creates building platforms for potentially hazard sensitive activities within the low hazard area of the Coastal Hazard Overlays, or within the inundation area of the Flood Hazard Overlay, or within the Liquefaction, Sheppards Fault or Terawhiti Fault Overlays) to remove the reference to 'Any consent notices, covenants, easements or other legal instruments necessary' and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.
Subdivision chapter / Subdivision / SUB-R19	Wellington City Council	266.106	Amend	Considers provisions relating to the consideration of 'any consent notices, covenants, easements or other legal instruments necessary' gives too much discretion to the assessment of controlled and restricted discretionary activities.	Delete below matter of control from rule SUB-R19.1.3 (Subdivision that creates building platforms for potentially hazard sensitive activities within the medium hazard area of the Coastal Hazard Overlays) as follows:  <del>Any consent notices, covenants, easements or other legal instruments necessary</del>
Subdivision chapter / Subdivision / SUB-R19	WCC Environmental Reference Group	377.208	Support	SUB-R19 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R19 (Subdivision that creates building platforms for potentially hazard sensitive activities within the medium hazard area of the Coastal Hazard Overlays) as notified.
Subdivision chapter / Subdivision / SUB-R19	Kāinga Ora Homes and Communities	391.232	Oppose in part	Opposes the inclusion of flood hazard overlays and the reference to 'Any consent notices, covenants, easements or other legal instruments necessary' in the District Plan and District Plan maps and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	Opposes in part SUB-R19 (Subdivision that creates building platforms for potentially hazard sensitive activities within the medium hazard area of the Coastal Hazard Overlays) and seeks amendment. to remove the reference to 'Any consent notices, covenants, easements or other legal instruments necessary' and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.
Subdivision chapter / Subdivision / SUB-R19	Kāinga Ora Homes and Communities	391.233	Amend	Opposes the inclusion of flood hazard overlays and the reference to 'Any consent notices, covenants, easements or other legal instruments necessary' in the District Plan and District Plan maps and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	Seeks amendment to SUB-R19 (Subdivision that creates building platforms for potentially hazard sensitive activities within the medium hazard area of the Coastal Hazard Overlays) to remove the reference to 'Any consent notices, covenants, easements or other legal instruments necessary' and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.
Subdivision chapter / Subdivision / SUB-R19	Wellington International Airport Ltd	406.269	Oppose	Opposes these provisions as it is not clear the circumstances where building platforms will be required to be identified as part of subdivision consent. This is inappropriate within the Airport Zone given the size of the land parcels and nature of the activities that are accommodated on site, even where the activity is for hazard sensitive or potentially hazard sensitive activities.  [See paragraphs 4.76 to 4.80 in original submission for further detail.]	Seeks that SUB-R19 (Subdivision that creates building platforms for potentially hazard sensitive activities within the medium hazard area of the Coastal Hazard Overlays) is amended to provide clarification around the requirement for building platforms, and provide that building platforms are not required at the time of subdivision within the Airport Zone.
Subdivision chapter / Subdivision / SUB-R19	Wellington International Airport Ltd	406.270	Amend	Opposes these provisions as it is not clear the circumstances where building platforms will be required to be identified as part of subdivision consent. This is inappropriate within the Airport Zone given the size of the land parcels and nature of the activities that are accommodated on site, even where the activity is for hazard sensitive or potentially hazard sensitive activities.  [See paragraphs 4.76 to 4.80 in original submission for further detail.]	Seeks that SUB-R19 (Subdivision that creates building platforms for potentially hazard sensitive activities within the medium hazard area of the Coastal Hazard Overlays) is amended to provide clarification around the requirement for building platforms, and provide that building platforms are not required at the time of subdivision within the Airport Zone.
Subdivision chapter / Subdivision / SUB-R20	WCC Environmental Reference Group	377.209	Support	SUB-R20 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R20 (Subdivision that creates building platforms for potentially hazard sensitive activities within overland flow...) as notified.



Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R20	Wellington International Airport Ltd	406.271	Oppose	Opposes these provisions as it is not clear the circumstances where building platforms will be required to be identified as part of subdivision consent. This is inappropriate within the Airport Zone given the size of the land parcels and nature of the activities that are accommodated on site, even where the activity is for hazard sensitive or potentially hazard sensitive activities.  [See paragraphs 4.76 to 4.80 in original submission for further detail.]	Seeks that SUB-R20 (Subdivision that creates building platforms for potentially hazard sensitive activities within overland flow path of the Flood Hazard Overlay, the Wellington Fault Overlay or the Ohariu Fault Overlay) is amended to provide clarification around the requirement for building platforms, and provide that building platforms are not required at the time of subdivision within the Airport Zone.
Subdivision chapter / Subdivision / SUB-R20	Wellington International Airport Ltd	406.272	Amend	Opposes these provisions as it is not clear the circumstances where building platforms will be required to be identified as part of subdivision consent. This is inappropriate within the Airport Zone given the size of the land parcels and nature of the activities that are accommodated on site, even where the activity is for hazard sensitive or potentially hazard sensitive activities.  [See paragraphs 4.76 to 4.80 in original submission for further detail.]	Seeks that SUB-R20 (Subdivision that creates building platforms for potentially hazard sensitive activities within overland flow path of the Flood Hazard Overlay, the Wellington Fault Overlay or the Ohariu Fault Overlay) is amended to provide clarification around the requirement for building platforms, and provide that building platforms are not required at the time of subdivision within the Airport Zone.
Subdivision chapter / Subdivision / SUB-R21	WCC Environmental Reference Group	377.210	Support	SUB-R21 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R21 (Subdivision that creates building platforms for potentially hazard sensitive activities within the stream corridor of the Flood...) as notified.
Subdivision chapter / Subdivision / SUB-R21	Kāinga Ora Homes and Communities	391.234	Oppose in part	SUB-R21 is opposed as it would prevent subdivision for residential activities in existing urban areas subject to coastal hazards such as Kilbirnie. An amendment is sought to change the activity status to Discretionary to allow for the potential for managing the hazard risk for residential activities. The reference to the 'Flood Hazard Overlays' is also opposed.	Opposes in part SUB-R21 (Subdivision that creates building platforms for potentially hazard sensitive activities within the stream corridor of the Flood Hazard Overlay or the high hazard area of the Coastal Hazard Overlays) and seeks amendment.
Subdivision chapter / Subdivision / SUB-R21	Kāinga Ora Homes and Communities	391.235	Amend	Considers that SUB-R21 should be amended, as it would prevent subdivision for residential activities in existing urban areas subject to coastal hazards such as Kilbirnie. Amendments to change the activity status to Discretionary to allow for the potential for managing the hazard risk for residential activities. Amendments are also sought to remove the reference to flood hazard overlays in the District Plan and to remove the reference to 'Any consent notices, covenants, easements or other legal instruments necessary'	Amend SUB-R21 (Subdivision that creates building platforms for potentially hazard sensitive activities within the stream corridor of the Flood Hazard Overlay or the high hazard area of the Coastal Hazard Overlays) as follows:  Subdivision that creates building platforms for potentially hazard sensitive activities within the stream corridor of the Flood Hazard Overlay or the high hazard area of the Coastal Hazard Overlays  1. Activity Status: <del>Non-Complying</del> Discretionary
Subdivision chapter / Subdivision / SUB-R21	Wellington International Airport Ltd	406.273	Oppose	Opposes these provisions as it is not clear the circumstances where building platforms will be required to be identified as part of subdivision consent. This is inappropriate within the Airport Zone given the size of the land parcels and nature of the activities that are accommodated on site, even where the activity is for hazard sensitive or potentially hazard sensitive activities.  [See paragraphs 4.76 to 4.80 in original submission for further detail.]	Seeks that SUB-R21 (Subdivision that creates building platforms for potentially hazard sensitive activities within the stream corridor of the Flood Hazard Overlay or the high hazard area of the Coastal Hazard Overlays) is amended to provide clarification around the requirement for building platforms, and provide that building platforms are not required at the time of subdivision within the Airport Zone.
Subdivision chapter / Subdivision / SUB-R21	Wellington International Airport Ltd	406.274	Amend	Opposes these provisions as it is not clear the circumstances where building platforms will be required to be identified as part of subdivision consent. This is inappropriate within the Airport Zone given the size of the land parcels and nature of the activities that are accommodated on site, even where the activity is for hazard sensitive or potentially hazard sensitive activities.  [See paragraphs 4.76 to 4.80 in original submission for further detail.]	Seeks that SUB-R21 (Subdivision that creates building platforms for potentially hazard sensitive activities within the stream corridor of the Flood Hazard Overlay or the high hazard area of the Coastal Hazard Overlays) is amended to provide clarification around the requirement for building platforms, and provide that building platforms are not required at the time of subdivision within the Airport Zone.
Subdivision chapter / Subdivision / SUB-R22	Wellington City Council	266.107	Amend	Considers provisions relating to the consideration of 'any consent notices, covenants, easements or other legal instruments necessary' gives too much discretion to the assessment of controlled and restricted discretionary activities.	Delete below matter of control from rule SUB-R22.1.3 (Subdivision that creates building platforms for hazard sensitive areas within the Sheppards Fault, Terawhiti Fault or Liquefaction Overlays) as follows:  <del>Any consent notices, covenants, easements or other legal instruments necessary</del>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R22	WCC Environmental Reference Group	377.211	Support	SUB-R22 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R22 (Subdivision that creates building platforms for hazard sensitive areas within the Sheppards Fault, Terawhiti Fault or Liquefaction Overlays) as notified.
Subdivision chapter / Subdivision / SUB-R22	Kāinga Ora Homes and Communities	391.236	Oppose in part	Opposes the inclusion of flood hazard overlays and the reference to 'Any consent notices, covenants, easements or other legal instruments necessary' in the District Plan and District Plan maps and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	Opposes in part SUB-R22 (Subdivision that creates building platforms for hazard sensitive areas within the Sheppards Fault, Terawhiti Fault or Liquefaction Overlays) and seeks amendment.
Subdivision chapter / Subdivision / SUB-R22	Kāinga Ora Homes and Communities	391.237	Amend	Opposes the inclusion of flood hazard overlays and the reference to 'Any consent notices, covenants, easements or other legal instruments necessary' in the District Plan and District Plan maps and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	Amend SUB-R22 (Subdivision that creates building platforms for hazard sensitive areas within the Sheppards Fault, Terawhiti Fault or Liquefaction Overlays) as follows:  1. Activity status: Controlled ... <del>3. Any consent notices, covenants, easements or other legal instruments necessary.</del> [Inferred decision requested]
Subdivision chapter / Subdivision / SUB-R23	Wellington City Council	266.108	Amend	Considers provisions relating to the consideration of 'any consent notices, covenants, easements or other legal instruments necessary' gives too much discretion to the assessment of controlled and restricted discretionary activities.	Delete below matter of discretion from rule SUB-R23.1.3 (Subdivision that creates building platforms for hazard sensitive activities within the inundation area of the Flood Hazard Overlay or the low hazard area of the Coastal Hazard Overlays) as follows:  <del>Any consent notices, covenants, easements or other legal instruments necessary</del>
Subdivision chapter / Subdivision / SUB-R23	Greater Wellington Regional Council	351.190	Amend	Considers the policies listed in matter of discretion 1 should include Policy SUB-P25	Amend SUB-R23 (Subdivision that creates building platforms for hazard sensitive activities within the inundation area of the Flood Hazard Overlay or the low hazard area of the Coastal Hazard Overlays) to include SUB-P25 (Subdivision of land affected by natural hazards) as a matter of discretion.
Subdivision chapter / Subdivision / SUB-R23	WCC Environmental Reference Group	377.212	Support	SUB-R23 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R23 (Subdivision that creates building platforms for hazard sensitive activities within the inundation area...) as notified.
Subdivision chapter / Subdivision / SUB-R23	Kāinga Ora Homes and Communities	391.238	Oppose in part	Opposes the inclusion of flood hazard overlays and the reference to 'Any consent notices, covenants, easements or other legal instruments necessary' in the District Plan and District Plan maps and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	Opposes in part SUB-R23 (Subdivision that creates building platforms for hazard sensitive activities within the inundation area of the Flood Hazard Overlay or the low hazard area of the Coastal Hazard Overlays) and seeks amendment.
Subdivision chapter / Subdivision / SUB-R23	Kāinga Ora Homes and Communities	391.239	Amend	Opposes the inclusion of flood hazard overlays and the reference to 'Any consent notices, covenants, easements or other legal instruments necessary' in the District Plan and District Plan maps and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	Amend SUB-R23 (Subdivision that creates building platforms for hazard sensitive activities within the inundation area of the Flood Hazard Overlay or the low hazard area of the Coastal Hazard Overlays) as follows:  Subdivision that creates building platforms for hazard sensitive activities within the inundation area of the Flood Hazard Overlay or the low hazard area of the Coastal Hazard Overlays  1. Activity Status: Restricted Discretionary ... <del>3. Any consent notices, covenants, easements or other legal instruments necessary.</del> 4. The matters in NH-P6 for building platforms that are located in the inundation area of the Flood Hazard Overlay; and ... [Inferred decision requested]
Subdivision chapter / Subdivision / SUB-R23	Wellington International Airport Ltd	406.275	Oppose	Opposes these provisions as it is not clear the circumstances where building platforms will be required to be identified as part of subdivision consent. This is inappropriate within the Airport Zone given the size of the land parcels and nature of the activities that are accommodated on site, even where the activity is for hazard sensitive or potentially hazard sensitive activities.  [See paragraphs 4.76 to 4.80 in original submission for further detail.]	Seeks that SUB-R23 (Subdivision that creates building platforms for hazard sensitive activities within the inundation area of the Flood Hazard Overlay or the low hazard area of the Coastal Hazard Overlays) is amended to provide clarification around the requirement for building platforms, and provide that building platforms are not required at the time of subdivision within the Airport Zone.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R23	Wellington International Airport Ltd	406.276	Amend	Opposes these provisions as it is not clear the circumstances where building platforms will be required to be identified as part of subdivision consent. This is inappropriate within the Airport Zone given the size of the land parcels and nature of the activities that are accommodated on site, even where the activity is for hazard sensitive or potentially hazard sensitive activities.  [See paragraphs 4.76 to 4.80 in original submission for further detail.]	Seeks that SUB-R23 (Subdivision that creates building platforms for hazard sensitive activities within the inundation area of the Flood Hazard Overlay or the low hazard area of the Coastal Hazard Overlays) is amended to provide clarification around the requirement for building platforms, and provide that building platforms are not required at the time of subdivision within the Airport Zone.
Subdivision chapter / Subdivision / SUB-R24	WCC Environmental Reference Group	377.213	Support	SUB-R24 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R24 (Subdivision that creates building platforms for hazard sensitive activities within an overland flow path of the Flood Hazard Overlay) as notified.
Subdivision chapter / Subdivision / SUB-R24	Kāinga Ora Homes and Communities	391.240	Oppose in part	Opposes the inclusion of flood hazard overlays and the reference to 'Any consent notices, covenants, easements or other legal instruments necessary' in the District Plan and District Plan maps and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	Opposes in part SUB-R24 (Subdivision that creates building platforms for hazard sensitive activities within an overland flow path of the Flood Hazard Overlay or the medium hazard areas of the Coastal Hazard Overlays) and seeks amendment.
Subdivision chapter / Subdivision / SUB-R24	Kāinga Ora Homes and Communities	391.241	Amend	Opposes the inclusion of flood hazard overlays and the reference to 'Any consent notices, covenants, easements or other legal instruments necessary' in the District Plan and District Plan maps and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	Amend SUB-R24 (Subdivision that creates building platforms for hazard sensitive activities within an overland flow path of the Flood Hazard Overlay or the medium hazard areas of the Coastal Hazard Overlays) as follows:  Subdivision that creates building platforms for hazard sensitive activities within an overland flow path of the Flood Hazard Overlay or the medium hazard areas of the Coastal Hazard Overlays  [Inferred decision requested]
Subdivision chapter / Subdivision / SUB-R24	Wellington International Airport Ltd	406.277	Oppose	Opposes these provisions as it is not clear the circumstances where building platforms will be required to be identified as part of subdivision consent. This is inappropriate within the Airport Zone given the size of the land parcels and nature of the activities that are accommodated on site, even where the activity is for hazard sensitive or potentially hazard sensitive activities.  [See paragraphs 4.76 to 4.80 in original submission for further detail.]	Seeks that SUB-R24 (Subdivision that creates building platforms for hazard sensitive activities within an overland flow path of the Flood Hazard Overlay or the medium hazard areas of the Coastal Hazard Overlays) is amended to provide clarification around the requirement for building platforms, and provide that building platforms are not required at the time of subdivision within the Airport Zone.
Subdivision chapter / Subdivision / SUB-R24	Wellington International Airport Ltd	406.278	Amend	Opposes these provisions as it is not clear the circumstances where building platforms will be required to be identified as part of subdivision consent. This is inappropriate within the Airport Zone given the size of the land parcels and nature of the activities that are accommodated on site, even where the activity is for hazard sensitive or potentially hazard sensitive activities.  [See paragraphs 4.76 to 4.80 in original submission for further detail.]	Seeks that SUB-R24 (Subdivision that creates building platforms for hazard sensitive activities within an overland flow path of the Flood Hazard Overlay or the medium hazard areas of the Coastal Hazard Overlays) is amended to provide clarification around the requirement for building platforms, and provide that building platforms are not required at the time of subdivision within the Airport Zone.
Subdivision chapter / Subdivision / SUB-R25	WCC Environmental Reference Group	377.214	Support	SUB-R25 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R25 (Subdivision that creates building platforms for hazard sensitive activities within the stream corridor of the Flood Hazard Overlay...) as notified.
Subdivision chapter / Subdivision / SUB-R25	Kāinga Ora Homes and Communities	391.242	Oppose in part	SUB-R25 is opposed as it would prevent subdivision for residential activities in existing urban areas subject to coastal hazards such as Kilbirnie. Amendments to change the activity status to Discretionary to allow for the potential for managing the hazard risk for residential activities are sought.  Opposes the inclusion of flood hazard overlays in the District Plan and District Plan maps and seeks all rules and standards remove the reference to the overlays and instead refer to the relevant hazard.	Opposes SUB-R25 (Subdivision that creates building platforms for hazard sensitive activities within the stream corridor of the Flood Hazard Overlay, the Wellington Fault Overlay, the Ohariu Fault Overlay or the high hazard area of the Coastal Hazard Overlays) and seeks amendments.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R25	Kāinga Ora Homes and Communities	391.243	Amend	Considers that SUB-R25 should be amended, as it would prevent subdivision for residential activities in existing urban areas subject to coastal hazards such as Kilbirnie. Amendments to change the activity status to Discretionary to allow for the potential for managing the hazard risk for residential activities. Amendments are also sought to remove the reference to flood hazard overlays in the District Plan and District Plan.	Amend SUB-R25 (Subdivision that creates building platforms for hazard sensitive activities within the stream corridor of the Flood Hazard Overlay, the Wellington Fault Overlay, the Ohariu Fault Overlay or the high hazard area of the Coastal Hazard Overlays) as follows:  Subdivision that creates building platforms for hazard sensitive activities within the stream corridor of the Flood Hazard Overlay, the Wellington Fault Overlay, the Ohariu Fault Overlay or the high hazard area of the Coastal Hazard Overlays  1. Activity Status: <del>Non-Complying</del> Discretionary  [Inferred decision requested]
Subdivision chapter / Subdivision / SUB-R25	Wellington International Airport Ltd	406.279	Oppose	Opposes these provisions as it is not clear the circumstances where building platforms will be required to be identified as part of subdivision consent. This is inappropriate within the Airport Zone given the size of the land parcels and nature of the activities that are accommodated on site, even where the activity is for hazard sensitive or potentially hazard sensitive activities.  [See paragraphs 4.76 to 4.80 in original submission for further detail.]	Seeks that SUB-R25 (Subdivision that creates building platforms for hazard sensitive activities within the stream corridor of the Flood Hazard Overlay, the Wellington Fault Overlay, the Ohariu Fault Overlay or the high hazard area of the Coastal Hazard Overlays) is amended to provide clarification around the requirement for building platforms, and provide that building platforms are not required at the time of subdivision within the Airport Zone.
Subdivision chapter / Subdivision / SUB-R25	Wellington International Airport Ltd	406.280	Amend	Opposes these provisions as it is not clear the circumstances where building platforms will be required to be identified as part of subdivision consent. This is inappropriate within the Airport Zone given the size of the land parcels and nature of the activities that are accommodated on site, even where the activity is for hazard sensitive or potentially hazard sensitive activities.  [See paragraphs 4.76 to 4.80 in original submission for further detail.]	Seeks that SUB-R25 (Subdivision that creates building platforms for hazard sensitive activities within the stream corridor of the Flood Hazard Overlay, the Wellington Fault Overlay, the Ohariu Fault Overlay or the high hazard area of the Coastal Hazard Overlays) is amended to provide clarification around the requirement for building platforms, and provide that building platforms are not required at the time of subdivision within the Airport Zone.
Subdivision chapter / Subdivision / SUB-R26	Wellington City Council	266.109	Amend	Considers provisions relating to the consideration of 'any consent notices, covenants, easements or other legal instruments necessary' gives too much discretion to the assessment of controlled and restricted discretionary activities.	Delete below matter of control/discretion from rule SUB-R26.1.3 (Subdivision within the Wellington Fault Overlay or medium or high coastal hazard areas on land occupied by City Centre Zone or Airport, operation port activities, passenger port facilities and rail activities) as follows:  <del>Any consent notices, covenants, easements or other legal instruments necessary.</del>
Subdivision chapter / Subdivision / SUB-R26	WCC Environmental Reference Group	377.215	Support	SUB-R26 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R26 (Subdivision within the Wellington Fault Overlay or medium or high coastal hazard areas on land...) as notified.
Subdivision chapter / Subdivision / SUB-R26	Wellington International Airport Ltd	406.281	Support in part	Supports this rule subject to the amendments sought to Policy CE-P20 of the Proposed Plan.	If amendments to CE-P20 in original submission are adopted:  Retain SUB-R26 (Subdivision within the Wellington Fault Overlay or medium or high coastal hazard areas on land occupied by City Centre Zone or Airport, operation port activities, passenger port facilities and rail activities) as notified.
Subdivision chapter / Subdivision / SUB-R27	Wellington City Council	266.110	Oppose	Considers the 'National Grid substation buffer' has been removed and as such this rule is no longer relevant.	Seeks to delete SUB-R27 in its entirety. AND: consequential renumbering of SUB-R28 to SUB-R31.
Subdivision chapter / Subdivision / SUB-R27	Transpower New Zealand Limited	315.170	Oppose	Submitter is not supportive of the rule and will not be pursuing it through the PDP process, noting there is no supporting definition of the substation buffer area to direct where the rule applies.	Delete Rule SUB-R27 (Subdivision in the National Grid substation buffer) in its entirety.
Subdivision chapter / Subdivision / SUB-R27	WCC Environmental Reference Group	377.216	Support	SUB-R27 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R27 (Subdivision in the National Grid substation buffer) as notified.
Subdivision chapter / Subdivision / SUB-R28	Transpower New Zealand Limited	315.171	Amend	Considers that on the basis the National Grid is a qualifying matter, the subdivision rule SUB-R28 should be addressed as part of the ISPP process.	Seeks that, subject to other amendments sought by the submitter to SUB-R28 (Subdivision in the National Grid Subdivision corridor) the rule be included within the IPI and made subject to the ISPP process.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R28	Transpower New Zealand Limited	315.172	Support in part	Supports SUB-R28 on the basis the rule gives effect to Policy 10 and Policy 11 of the NPS-ET and provides for the outcomes sought in INF-P7 (noting Transpower is seeking amendment to the policy). In particular the activity status is supported and reflects the approach in other district plans across New Zealand. Considers a restricted discretionary activity status for subdivision provides an appropriate incentive and opportunity to design subdivision layouts that avoid building sites within the National Grid Yard. Considers that Subdivision is the most effective point at which to ensure future reverse sensitivity effects, maintenance access issues, and adverse effects of transmission lines (including amenity issues) are avoided. This can be achieved by designing subdivision layouts to properly accommodate transmission corridors (including, for example, through the creation of reserves and/or open space where buffer corridors are located). The default non-complying status is supported where the standards cannot be met and reflects the strong policy directive of the NPS-ET. Seeks the following amendments: - Amend clause 2. to provide clarity and certainty the consideration also applies to the support structures, noting that transmission lines are not defined in the PDP. - Amend clause 5. to provide further direction as to the matters to consider when considering vegetation planting. - Provide as a matter of discretion, the risk of electrical hazards (new clause 8.).	Retain SUB-R28 (Subdivision in the National Grid subdivision corridor), subject to amendment.
Subdivision chapter / Subdivision / SUB-R28	Transpower New Zealand Limited	315.173	Amend	Supports SUB-R28 on the basis the rule gives effect to Policy 10 and Policy 11 of the NPSET and provides for the outcomes sought in INF-P7 (noting Transpower is seeking amendment to the policy). In particular the activity status is supported and reflects the approach in other district plans across New Zealand. Considers a restricted discretionary activity status for subdivision provides an appropriate incentive and opportunity to design subdivision layouts that avoid building sites within the National Grid Yard. Considers that Subdivision is the most effective point at which to ensure future reverse sensitivity effects, maintenance access issues, and adverse effects of transmission lines (including amenity issues) are avoided. This can be achieved by designing subdivision layouts to properly accommodate transmission corridors (including, for example, through the creation of reserves and/or open space where buffer corridors are located). The default non-complying status is supported where the standards cannot be met and reflects the strong policy directive of the NPSET. Seeks the following amendments: - Amend clause 2. to provide clarity and certainty the consideration also applies to the support structures, noting that transmission lines are not defined in the PDP. - Amend clause 5. to provide further direction as to the matters to consider when considering vegetation planting. - Provide as a matter of discretion, the risk of electrical hazards (new clause 8.).	Amend SUB-R28 (Subdivision in the National Grid subdivision corridor) as follows: ... Matters of discretion are: ... 2. The provision for the on-going efficient operation, maintenance, development and upgrade of the National Grid, including the ability for continued reasonable access to existing transmission lines <u>and support structures</u> for maintenance, inspections and upgrading; ... 5. The nature and location of any proposed vegetation to be planted in the vicinity of the National Grid, <u>and how such landscaping will impact on the operation, maintenance, upgrade and development (including access) of the National Grid;</u> 6. The outcome of any consultation with Transpower; and 7. The extent to which the design and layout of the subdivision demonstrates that a suitable building platform or platforms for a principal building or dwelling can be located outside of the National Grid Yard for each new allotment. 8. <u>The risk of electrical hazards affecting public or individual safety, and the risk of property damage.</u> ...
Subdivision chapter / Subdivision / SUB-R28	WCC Environmental Reference Group	377.217	Support	SUB-R28 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R28 (Subdivision in the National Grid subdivision corridor) as notified.
Subdivision chapter / Subdivision / SUB-R29	Firstgas Limited	304.39	Amend	Considers that SUB-R29 should not have a Permitted Activity status. New subdivision, and future land use development enabled by subdivision, can adversely affect the safe, efficient and effective functioning of the Gas Transmission Network including above-ground stations. The Gas Transmission Pipeline Corridor, as well as above ground related infrastructure has the ability to affect how subdivision and development takes place. A Restricted Discretionary Activity is considered more appropriate to manage the consultation outcomes sought as part of a matter of discretion (not control) by Council.	Delete SUB-R29.1 (Subdivision of land containing a Gas Transmission Pipeline corridor) in its entirety and replace with a new rule.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-R29	Firstgas Limited	304.40	Amend	<p>Considers that SUB-R29 should be amended to ensure that it includes the subdivision of land containing and/or within 10m the Gas Transmission Pipeline Corridor or subdivision of land within 30m of above ground related infrastructure. The rule should be amended so that the subdivision of land containing and/or within 10m of a Gas Transmission Pipeline Corridor or within 30m of above ground related infrastructure can be appropriately managed</p> <p>New subdivision, and future land use development enabled by subdivision, can adversely affect the safe, efficient and effective functioning of the Gas Transmission Network including above-ground stations. The Gas Transmission Pipeline Corridor, as well as above ground related infrastructure has the ability to affect how subdivision and development takes place.</p>	<p>Amend SUB-R29.1 (Subdivision of land containing a Gas Transmission Pipeline corridor) as follows:</p> <p>Subdivision of land containing <u>and/or within 10m of a Gas Transmission Pipeline Corridor or;</u>  <u>Subdivision of land within 30m of above ground related infrastructure.</u></p> <p>Activity status: <u>Restricted Discretionary</u></p> <p>Where:</p> <p>a. The subdivision will not result in any building(s) (or any part of any building) or <del>sensitive-residential</del> activities being located within <u>10m of the gas transmission pipeline corridor and/or within 30m of above ground related infrastructure;</u></p> <p>b. New allotment boundaries are outside of, and do not cross, the gas transmission pipeline corridor <u>and/or within 30m of above ground related infrastructure;</u></p> <p>c. The layout of allotments, including the balance area, and any associated earthworks, maintains physical and practical access to the Gas Transmission Pipeline; and</p> <p>d. The subdivision is not located in any Residential Zone.</p> <p>Matters of control are:</p> <p>....</p> <p>4. The extent to which the subdivision design allows for activities to be setback from the Gas Transmission <del>Network pipeline;</del> Gas Transmission <del>Network pipeline;</del></p> <p>5. The nature and location of any vegetation to be planted in the vicinity of the Gas Transmission <del>Network pipeline;</del> and Gas Transmission <del>Network pipeline;</del> and</p> <p>6. The outcome of any consultation with the owner and operator of the gas transmission pipeline.</p>
Subdivision chapter / Subdivision / SUB-R29	WCC Environmental Reference Group	377.218	Support	SUB-R29 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R29 (Subdivision of land containing a Gas Transmission Pipeline corridor) as notified.
Subdivision chapter / Subdivision / SUB-R30	WCC Environmental Reference Group	377.219	Support	SUB-R30 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R30 (Subdivision with the Air Noise Boundary) as notified.
Subdivision chapter / Subdivision / SUB-R30	Wellington International Airport Ltd	406.282	Support in part	<p>Supports the discretionary activity status for subdivision within the Air Noise Boundary, however, submits that this rule should also apply to the 60dB Ldn Noise Boundary.</p> <p>[See paragraphs 4.62 to 4.75 in original submission for further detail.]</p>	Retain SUB-R30 (Subdivision within the Air Noise Boundary) and seeks amendment.
Subdivision chapter / Subdivision / SUB-R30	Wellington International Airport Ltd	406.283	Amend	<p>Supports the discretionary activity status for subdivision within the Air Noise Boundary, however, submits that this rule should also apply to the 60dB Ldn Noise Boundary.</p> <p>[See paragraphs 4.62 to 4.75 in original submission for further detail.]</p>	<p>Amend SUB-R30 (Subdivision within the Air Noise Boundary) as follows:</p> <p>SUB-R30 Subdivision within the Air Noise Boundary <u>or 60dB Ldn Noise Boundary</u></p> <p>Activity Status: Discretionary</p> <p><u>Notification status: For a resource consent application made in respect of Rule SUB-R30, WIAL must be considered to be an affected person in accordance with Section 95E of the RMA.</u></p>
Subdivision chapter / Subdivision / SUB-R31	WCC Environmental Reference Group	377.220	Support	SUB-R31 is supported as it gives effect to Subdivision objectives and policies.	Retain SUB-R31 (Any other subdivision) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-S1	Fire and Emergency New Zealand	273.128	Support in part	Supports standard as it requires allotments to have access to a formed legal road. However, FENZ requires vehicle access standards to help ensure accesses can accommodate a fire appliances. As per the feedback provided within the Infrastructure and Transport chapters, FENZ seeks an amendment to SUB-S1 to ensure sufficient access for firefighting appliances is provided to sites in unreticulated areas, or areas where the driveway exceeds hose run distances	Retain SUB-S1 (Access), with amendment.
Subdivision chapter / Subdivision / SUB-S1	Fire and Emergency New Zealand	273.129	Amend	Supports standard as it requires allotments to have access to a formed legal road. However, FENZ requires vehicle access standards to help ensure accesses can accommodate a fire appliances. As per the feedback provided within the Infrastructure and Transport chapters, FENZ seeks an amendment to SUB-S1 to ensure sufficient access for firefighting appliances is provided to sites in unreticulated areas, or areas where the driveway exceeds hose run distances	Amend SUB-S1 (Access) as follows:  Every allotment must have practical, physical and legal access directly to a formed legal road or by way of a registered right-of-way.  <u>Any access to a site located in an area where no fully reticulated water supply system is available, or having a length greater than 50 metres when connected to a road that has a fully reticulated water supply system including hydrants, must be designed to accommodate a fire appliance design vehicle of at least 2.5 metres wide and 13 metres long and with a minimum gross mass of 25 tonne including:</u> <u>a. a gradient of no more than 15% at any point; and</u> <u>b. a minimum clear passageway and/or vehicle crossing of at least 3.5 metres width at the site entrance, internal entrances and between buildings; and</u> <u>c. a minimum formed carriageway width of 4 metres; and</u> <u>d. a height clearance of at least 4 metres; and</u> <u>e. a design that is free of obstacles that could hinder access for emergency service vehicles; and</u> <u>f. The provision of hardstand and turnaround areas with maximum gradient of 5% in all directions.</u>
Subdivision chapter / Subdivision / SUB-S1	Waka Kotahi	370.198	Support in part	Supports with amendments, noted below.	Supports with amendment, noted below.
Subdivision chapter / Subdivision / SUB-S1	Waka Kotahi	370.199	Amend	The Submitter seeks the addition of a note pertinent to this standard.	Amend SUB-S1 (Access) as follows:  Every allotment must have practical, physical and legal access directly to a formed legal road or by way of a registered right-of-way.  <u>Note, please refer to the requirements of Waka Kotahi NZ Transport Agency and Part IV of the Government Roading Powers Act 1989 with regard to vehicle entrances onto state highways.</u>
Subdivision chapter / Subdivision / SUB-S1	Survey & Spatial New Zealand Wellington Branch	439.31	Oppose	Considers that this standard requires discretion to be exercised by Council, which is not appropriate for a standard. Considers that this standard replicates S106(1)(c) of the RMA and is therefore an unnecessary duplication.	Delete SUB-S1 (Access).
Subdivision chapter / Subdivision / SUB-S2	AdamsonShaw	137.1	Amend	Considers that SUB-S2 should be clarified to refer to new <i>vacant</i> allotments.  An allotment created around an existing dwelling (i.e.. not a vacant allotment) will not create an adverse effects on the existing water supply arrangement currently serving the existing house. Therefore, upgrades to the existing water supply arrangement (to meet current standards by Wellington Water Limited) cannot be required in the form of a condition of the subdivision consent as per Section 108AA(1)(b)(i) of the Resource Management Act. The existing water supply arrangement servicing the existing dwelling on the allotment (as long as the dwelling is to remain as part of the subdivision) can be retained in full.	Amend SUB-S2 (Water supply) to specifically refer to new <i>vacant</i> allotments.
Subdivision chapter / Subdivision / SUB-S2	AdamsonShaw	137.2	Amend	Considers that SUB-S2 should be clarified to ensure that existing water supply arrangements continuing to serve an existing dwelling as part of the subdivision can be retained in full.	Amend SUB-S2 (Water supply) to add a point to ensure that existing water supply arrangements continuing to serve an existing dwelling as part of the subdivision can be retained in full.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-S2	Fire and Emergency New Zealand	273.130	Support in part	<p>Strongly supports the standard as it requires all new lots to be serviced with reticulated water supply where available and, where this is not possible or sufficient, the provision of an alternative and satisfactory firefighting water supply must be provided.</p> <p>FENZ also supports reference to the firefighting Code of Practice specifically within the standards as it gives assurance that new lots as required will have ability to connect to an adequate firefighting water supply which is best considered before the development of any new buildings on the lot.</p> <p>It is also essential that FENZ personnel are able to access such supplies to utilise for firefighting purposes. The standards for the facilitation of such access are also contained within the Code of Practice. Specific reference to the necessity to provide access to water supply in accordance with the Code is therefore sought. FENZ supports the assessment criteria where the standard is infringed which includes the suitability of the proposed water supply for firefighting purposes, including effects on people's health and safety, and on property. Where this standard is infringed, it is considered necessary for FENZ to be consulted on any such applications.</p>	Supports SUB-S2 (Water supply), with amendment.
Subdivision chapter / Subdivision / SUB-S2	Fire and Emergency New Zealand	273.131	Amend	<p>Strongly supports the standard as it requires all new lots to be serviced with reticulated water supply where available and, where this is not possible or sufficient, the provision of an alternative and satisfactory firefighting water supply must be provided.</p> <p>FENZ also supports reference to the firefighting Code of Practice specifically within the standards as it gives assurance that new lots as required will have ability to connect to an adequate firefighting water supply which is best considered before the development of any new buildings on the lot.</p> <p>It is also essential that FENZ personnel are able to access such supplies to utilise for firefighting purposes. The standards for the facilitation of such access are also contained within the Code of Practice. Specific reference to the necessity to provide access to water supply in accordance with the Code is therefore sought. FENZ supports the assessment criteria where the standard is infringed which includes the suitability of the proposed water supply for firefighting purposes, including effects on people's health and safety, and on property. Where this standard is infringed, it is considered necessary for FENZ to be consulted on any such applications.</p>	<p>Amend SUB-S2 (Water supply) as follows:</p> <ol style="list-style-type: none"> <li>1. Where a connection to Council's reticulated water supply systems is available, all new allotments must: <ol style="list-style-type: none"> <li>a. Be provided with a water supply connection at the allotment boundary, that provides the level of service in Chapter 6, Tables 6.1 and 6.2 of the Wellington Water Regional Standard for Water Services May 2019;</li> <li>b. Comply with water supply requirements, <u>including the requirements for access to such supply</u>, in of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008; and</li> </ol> </li> <li>2. Where a connection to Council's reticulated water supply systems is not available, all allotments must: <ol style="list-style-type: none"> <li>a. Be provided with access to a self-sufficient potable water supply with a minimum volume of 10,000L; and</li> <li>b. Comply with the water supply requirements, <u>including the requirements for access to such supply</u>, of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</li> </ol> </li> </ol>
Subdivision chapter / Subdivision / SUB-S2	Greater Wellington Regional Council	351.191	Amend	<p>Considers that this would reduce the demand on reticulated water supplies, to have regard to Policies FW.2, FW.3, FW.5 and CC.14 42 (q) in Proposed RPS Change 1, and Policy 45 in the Operative RPS.</p>	Amend SUB-S2 (Water supply) to require new lots connecting to the Council's water supply system to include alternate supplies for non-potable use, such as roofwater collection systems among other possible sources.
Subdivision chapter / Subdivision / SUB-S2	Survey & Spatial New Zealand Wellington Branch	439.32	Amend	<p>Considers that this rule makes the Regional Standard for Water Services 2021 a permitted activity standard. Therefore considers that the document (or specific relevant provisions) should be incorporated into the Proposed District Plan to allow submissions on the provisions, rather than being incorporated as a reference document. Considers that the consultation requirements of Schedule 1, Clause 34 of the RMA have therefore not been met. Considers that incorporating material by reference creates uncertainty for developers, as these documents can be amended by other entities (specifically Wellington Water) with no particular process. Notes that while there was some consultation, few issues were resolved. Notes that a District Plan change would be required to incorporate any new variations to the Regional Standard for Water Services 2021.</p>	<p>Amend SUB-S2 (Water supply):</p> <p>Remove reference to the Regional Standard for Water Services</p> <p>Add minimum requirements for new connections into the District Plan as required by the Regional Standard for Water Services.</p>



Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-S3	AdamsonShaw	137.3	Amend	<p>Considers that SUB-S3 should be clarified to refer to new <i>vacant</i> allotments.</p> <p>An allotment created around an existing dwelling (i.e.. not a vacant allotment) will not create an adverse effects on the existing wastewater system/connection currently serving the existing house. Therefore, upgrades to the existing wastewater system/connection (to meet current standards by Wellington Water Limited) cannot be required in the form of a condition of the subdivision consent as per Section 108AA(1)(b)(i) of the Resource Management Act. The existing wastewater system/connection servicing the existing dwelling on the allotment (as long as the dwelling is to remain as part of the subdivision) can be retained in full.</p>	Amend SUB-S3 (Wastewater disposal) to specifically refer to new <i>vacant</i> allotments.
Subdivision chapter / Subdivision / SUB-S3	AdamsonShaw	137.4	Amend	Considers that SUB-S3 should be clarified to ensure that existing wastewater system/connection continuing to serve an existing dwelling as part of the subdivision can be retained in full.	Amend SUB-S3 (Wastewater disposal) to add a point to ensure that existing wastewater system/connection continuing to serve an existing dwelling as part of the subdivision can be retained in full.
Subdivision chapter / Subdivision / SUB-S3	Greater Wellington Regional Council	351.192	Amend	Considers that the specific reference to septic tanks or soakage fields should be updated to refer to on-site domestic wastewater treatment and disposal.	Amend wording of SUB-S3 (Wastewater disposal) clause 2 as follows: Where a connection to Council's reticulated wastewater systems is not available, all allotments must be provided with <del>on-site wastewater systems a septic tank or soakage field</del> or an approved alternative means to dispose of sewage in a sanitary manner'.
Subdivision chapter / Subdivision / SUB-S3	Greater Wellington Regional Council	351.193	Amend	<p>Considers that the standard should provide for using approved alternative wastewater systems for decentralised wastewater re-use and treatment (of grey and black water) and disposal anywhere where there are constraints on the existing network capacity, as well as where connections aren't available.</p> <p>Providing for alternative wastewater treatment options aligns with recommendation 35 of Te Mahere Wai and gives effect to Te Mana o Te Wai. Alternative wastewater treatment options often reduce potable water use significantly. Reducing pressure of new development on the wastewater network may also make intensification in some areas with existing network capacity constraints more feasible.</p> <p>Relevant direction from the operative RPS includes policies 16 and 45. Relevant direction from Proposed RPS Change 1 includes policies FW.2, FW.3 and FW.5, CC.14 and 42(r), FW.5 and 58. Regional plan rules would apply to discharges from all wastewater systems to manage potential impacts on groundwater and surface water quality, aquatic ecosystems and soil health. These requirements could feasibly be met by approved alternative wastewater systems in both brownfield development and greenfield development.</p>	Seeks that WCC provide for the possibility of de-centralised wastewater re-use and treatment (of grey and black water) and disposal using alternative approved wastewater systems anywhere where there are constraints on the existing network capacity, as well as where connections are not available. Where connections are available and there is network capacity, a connection to the wastewater network would still be required.
Subdivision chapter / Subdivision / SUB-S3	Greater Wellington Regional Council	351.194	Amend	Considers that this standard should refer to additional requirements for on-site wastewater discharge under the Natural Resources Plan.	Seeks to amend to refer to additional requirements for on-site wastewater discharge under the Natural Resources Plan.
Subdivision chapter / Subdivision / SUB-S3	Survey & Spatial New Zealand Wellington Branch	439.33	Amend	Considers that this rule makes the Regional Standard for Water Services 2021 a permitted activity standard. Therefore considers that the document (or specific relevant provisions) should be incorporated into the Proposed District Plan to allow submissions on the provisions, rather than being incorporated as a reference document. Considers that the consultation requirements of Schedule 1, Clause 34 of the RMA have therefore not been met. Considers that many of the "level of service" items listed in the Standard are not appropriate to be standards for the District Plan. For example, the on-site disposal standards require Council to exercise discretion, which creates uncertainty.	<p>Amend SUB-S3 (Wastewater disposal):</p> <p>Remove reference to the Regional Standard for Water Services</p> <p>Add minimum requirements for new connections into the District Plan as required by the Regional Standard for Water Services.</p>
Subdivision chapter / Subdivision / SUB-S4	Rod Halliday	25.24	Amend	Considers that SUB-S4 (Stormwater management) needs to have an exemption, or a permitted activity standard that does not require hydraulic neutrality for sites upstream of the Stebbings or Seton Nossiter detention structure that are designed to hold back the 1 in 100 year storm event.	Seeks that an exemption be added in SUB-S4 (Stormwater management), point 2, where allotments should not be required to achieve hydraulic neutrality if they are located within the Stebbings or Seton Nossiter stormwater catchments.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-S4	AdamsonShaw	137.5	Amend	<p>Considers that SUB-S4 should be clarified to refer to new <i>vacant</i> allotments.</p> <p>An allotment created around an existing dwelling (i.e.. not a vacant allotment) will not create an adverse effects on the existing stormwater system/connection currently serving the existing house. Therefore, upgrades to the existing stormwater system/connection (to meet current standards by Wellington Water Limited) cannot be required in the form of a condition of the subdivision consent as per Section 108AA(1)(b)(i) of the Resource Management Act. The existing stormwater system/connection servicing the existing dwelling on the allotment (as long as the dwelling is to remain as part of the subdivision) can be retained in full.</p>	Amend SUB-S4 (Stormwater management) to specifically refer to new <u>vacant</u> allotments.
Subdivision chapter / Subdivision / SUB-S4	AdamsonShaw	137.6	Amend	Considers that SUB-S4 should be clarified to ensure that existing stormwater system/connection continuing to serve an existing dwelling as part of the subdivision can be retained in full.	Amend SUB-S4 (Stormwater management) to add a point to ensure that existing stormwater system/connection continuing to serve an existing dwelling as part of the subdivision can be retained in full.
Subdivision chapter / Subdivision / SUB-S4	AdamsonShaw	137.7	Amend	Considers that SUB-S4 should be clarified to reflect that subdivisions can involve creating allotments around existing dwellings. Allotments that contain existing dwellings do not need to be provided with hydraulic neutrality. This is because the dwelling existed prior to the subdivision and so the subdivision is not increasing the stormwater runoff on this allotment.	Amend SUB-S4.2 (Stormwater management) as follows:  2. All subdivisions <u>creating vacant allotments</u> must achieve hydraulic neutrality; and ...
Subdivision chapter / Subdivision / SUB-S4	AdamsonShaw	137.8	Amend	Considers that SUB-S4 should be clarified to reflect that allotments that contain existing dwellings do not need to be provided with hydraulic neutrality.	Amend SUB-S4.2 (Stormwater management) to include a note pointing out that existing dwellings do not require hydraulic neutrality.
Subdivision chapter / Subdivision / SUB-S4	Trelissick Park Group	168.21	Support	Supports that SUB-S4 (Stormwater management) covers stormwater hydraulic neutrality and water sensitive design.	Retain SUB-S4 (Stormwater management) as notified, with amendments below.
Subdivision chapter / Subdivision / SUB-S4	Trelissick Park Group	168.22	Amend	Considers that it is essential that all building developments, including infill housing, require at least neutral or lesser stormwater runoff, compared with pre-development, and so infringement provisions for stormwater should be deleted.	<p>Amend SUB-S4 (Stormwater management) as follows: ... <del>Assessment criteria where the standard is infringed:</del></p> <ol style="list-style-type: none"> <li><del>1. The extent to which the proposed stormwater management solution is sufficient for the development or activity it serves;</del></li> <li><del>2. The extent to which the proposed stormwater management solution results in adverse effects on peoples' health and safety;</del></li> <li><del>3. Whether the proposed stormwater management solution results in adverse flooding effects on other property, including on the effective function of Council's reticulated network;</del></li> <li><del>4. Where Council's reticulated system is not immediately available but is likely to be in the near future, the appropriateness of temporary systems; and</del></li> <li><del>5. Whether any site constraints make compliance impracticable.</del></li> </ol>
Subdivision chapter / Subdivision / SUB-S4	Tyers Stream Group	221.71	Amend	Considers that SUB-S4 is OK except that provision of a connection to the water reticulation network does not fund the upgrade needed for that network to cope with extra capacity required for the series of new subdivision.	<p>Seeks amendment to SUB-S4 (Stormwater management) to require contributions from the subdivider to any upgrades, in proportion to the extent of upgrade required from the subdivision.</p> <p>[Inferred decision requested]</p>
Subdivision chapter / Subdivision / SUB-S4	Greater Wellington Regional Council	351.195	Amend	Considers these standards should refer to additional requirements for stormwater discharge under the Natural Resources Plan.	Seeks to amend to refer to additional requirements for stormwater discharge under the Natural Resources Plan.
Subdivision chapter / Subdivision / SUB-S4	Survey & Spatial New Zealand Wellington Branch	439.34	Amend	Considers that this rule makes the Regional Standard for Water Services 2021 a permitted activity standard. Therefore considers that the document (or specific relevant provisions) should be incorporated into the Proposed District Plan to allow submissions on the provisions, rather than being incorporated as a reference document. Considers that the consultation requirements of Schedule 1, Clause 34 of the RMA have therefore not been met. In the Standard, Tables 4.1 of the Standard provides a design level of service for a 10% AEP. However, Tables 4.2 and 4.3 evaluate floor levels and flood depths/flows in public areas, which are not relevant to the provision of stormwater connection for a lot.	<p>Amend SUB-S4 (Stormwater management):</p> <p>Remove reference to the Regional Standard for Water Services</p> <p>Add minimum requirements for new connections into the District Plan as required by the Regional Standard for Water Services.</p>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested								
Subdivision chapter / Subdivision / SUB-S5	Chorus New Zealand Limited	88.2	Support	The SUB-S5 is supported as it ensures that appropriate subdivision activities within the relevant zones have provision for fibre optic cables. This provision achieves an appropriate balance to ensure that all allotments created by any subdivision are adequately serviced by telecommunications in accordance with SUB-P7.	Retain SUB-S5 (Telecommunications and power supply) as notified.								
Subdivision chapter / Subdivision / SUB-S6	Rod Halliday	25.25	Amend	Considers that the use of the phrase 'capable of providing a platform within the 'built' area' in SUB-S6.8 (Upper Stebbings and Glenside West Development Area) is ambiguous and subject to misinterpretation. This development should be treated like 'All other Zones' .	Amend SUB-S6.8 (Number, size and shape of allotments - Upper Stebbings and Glenside West Development Area) as follows:  ... Upper Stebbings and Glenside West Development Area 8. Minimum allotment size and shape: <del>Capable of providing a platform within the 'built' area</del> nil [Inferred decision requested].								
Subdivision chapter / Subdivision / SUB-S6	Kāinga Ora Homes and Communities	391.244	Support in part	SUB-S6 is generally supported, but amendments are sought regarding the exclusion of minimum lot size requirements and limits as applied by this standard. [Submitter refers to SUB-R6 instead of SUB-S6]	Retain SUB-S6 (Number, size and shape of allotments) with amendment.								
Subdivision chapter / Subdivision / SUB-S6	Kāinga Ora Homes and Communities	391.245	Amend	Considers that SUB-S6 should be amended to exclude minimum lot size requirements and limits as applied by this standard. However, considers that the minimum lot size in the Metropolitan Centre, Local Centre, Neighbourhood Centre, Mixed Use and General Industrial Zone should be nil as well. Applying a minimum lot size is considered inconsistent with SUB-O1, SUB-P1 and SUB-P5.  It is also sought by the submitter that a minimum shape factor standard is added for vacant allotments, to match with SUB-R5. The matters of control that apply to the creation of a vacant allotment ensure appropriate consideration is given to the feasible development of all vacant allotments which is considered sufficient to ensure small, undevelopable lots do not result.  The submitter also requests the deletion to any reference of legal instruments as a matter of assessment criteria for considering and determining consent applications.	Amend SUB-S6 (Number, size and shape of allotments) as follows:  Number, size and shape of <u>vacant</u> allotments  The following maximum <u>vacant</u> allotment number and minimum size and shape limits must be complied with for any fee simple subdivision:  ... <table border="0"> <tr> <td>Standard</td> <td>Limit</td> </tr> <tr> <td>....</td> <td></td> </tr> <tr> <td colspan="2"><u>Vacant Allotments</u></td> </tr> <tr> <td><u>Minimum allotment shape</u></td> <td><u>Accommodate a rectangle of 8m x 15m.</u></td> </tr> </table> Metropolitan Centre, Local Centre, Neighbourhood Centre, Mixed Use & General Industrial Zones 5. Maximum number of allotments nil 6. Minimum allotment size <del>500m<sup>2</sup></del> <u>nil</u> 7. Minimum allotment shape nil  Assessment Criteria where the standard is infringed: 1. The extent to which a <del>higher density of</del> development is compatible with the <u>anticipated zone purpose, form and function</u> <del>local site context</del> ; ... 5. <del>The effectiveness of any legal or instruments necessary to limit future intensification.</del> [Refer to original submission for table]	Standard	Limit	....		<u>Vacant Allotments</u>		<u>Minimum allotment shape</u>	<u>Accommodate a rectangle of 8m x 15m.</u>
Standard	Limit												
....													
<u>Vacant Allotments</u>													
<u>Minimum allotment shape</u>	<u>Accommodate a rectangle of 8m x 15m.</u>												
Subdivision chapter / Subdivision / SUB-S7	Rod Halliday	25.26	Amend	Considers that SUB-S7 (Esplanade reserves and esplanade strips) seems inappropriate to apply to large rural lots as this will see huge tracts of riparian areas lost. SUB-S7 should be reverted back to the way it was written in Rule 15.4.5 in the Operative District Plan, with only lots less than 4ha in the rural zone captured.	Seeks that SUB-S7 (Esplanade reserves and esplanade strips) only applies to lots smaller than 4ha in Rural Zones.								

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Subdivision chapter / Subdivision / SUB-S7	Rod Halliday	25.27	Amend	<p>Considers that SUB-S7 (Esplanade reserves and esplanade strips) seems inappropriate to apply to large rural lots as this will see huge tracts of riparian areas lost. SUB-S7 should only be applicable to the following identified streams and tributaries, as stated in the Operative District Plan, Rule 15.4.5:</p> <ul style="list-style-type: none"> <li>- Porirua Stream and tributaries</li> <li>- Makara Stream and tributaries, including Ohariu Stream</li> <li>- Oteranga Stream and tributaries</li> <li>- Karori Stream and tributaries</li> </ul>	<p>Seeks that SUB-S7 (Esplanade reserves and esplanade strips) applies solely to the following streams and tributaries:</p> <ul style="list-style-type: none"> <li>- Porirua Stream and tributaries</li> <li>- Makara Stream and tributaries, including Ohariu Stream</li> <li>- Oteranga Stream and tributaries</li> <li>- Karori Stream and tributaries</li> </ul>