BWS|22217

Attachment A – PC 12 Specific Submission Points

Chapter	Provisions	Support / Oppose	Reasons and decision sought
Chapter 2 Strategic Framework			
	City Urban Form ***Objective 2.2.14*** *i. A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.* *ii. City urban form that enables people to satisfy most of their daily needs within a nominal 10-minute walk from home and all other daily needs within a nominal 20-minute one-way cycle, micro-mobility, or bus ride from home.* ***Policies*** *2.2.14a* *Provide for residential and mixed-use developments of unlimited height within the Central City Zone.* *2.2.14b* *Provide for high-density residential developments within a nominal 800m walking distance of the Central City Zone.* *2.2.14c* *Provide for medium-density residential developments within a nominal 400m walking distance of the Sub-regional Centre at Chartwell and the Suburban Centres at Thomas Road, Lynden Court, Five Cross Roads, Clyde Street East, Hamilton East, Glenview, Frankton, and Dinsdale.* *2.2.14d* *Enable higher density residential development within a nominal 200m walking distance of Nawton Suburban Centre.* *...*	**Support in part**	The Submitter supports Objective 2.2.14 and policies 2.2.14a-2.2.14d as they promote intensification and alternative modes of transport.
Chapter 4 Residential Zones			
4.1.2 Objectives and Policies: All Residential Zones	*4.1.2.1* *Ensure that development within the Residential Zones gives effect to The Vision and Strategy - Te Ture Whaimana o Te Awa o Waikato.* *4.1.2.1a* *Avoid development where the direct or cumulative effects on the three waters*	Support in part	The applicant supports this objective and policy set in principle but seeks the wording changes below: *4.1.2.1c* *The health and wellbeing of the Waikato River is restored and*

	infrastructure network cannot be mitigated. *4.1.2.1b* *Developments and activities in the Residential Zones must give effect to the outcomes in the The Vision and Strategy - Te Ture Whaimana o Te Awa o Waikato through developments and activities being designed and operated to protect and restore the health and wellbeing of the River.* *4.1.2.1c* *The health and wellbeing of the Waikato River is restored and protected by controlling density, building size, site permeability and appropriate mitigation of earthworks, and by maintaining and enhancing access to the Waikato River.* *4.1.2.1d* *Where development is adjoining gullies that convey stormwater to the Waikato River, a comprehensive treatment train approach to stormwater treatment, indigenous wetland and landscape planting, and ecological restoration of the gullies will be required to enhance and protect the ecological values of the gully network.* *4.1.2.1e* *Water-sensitive techniques are incorporated into new development to reduce demand on water supplies, wastewater disposal and to manage stormwater.*		*protected by controlling density, ~~building size,~~ site permeability and appropriate mitigation of earthworks, and by maintaining and enhancing access to the Waikato River.* Effects on the Waikato River result predominantly from permeability and density and the river can be sufficiently protected by controlling these matters. Building size is considered to result in changes to amenity and effects on people, rather than the river. Reference to building size should not need to be included in this objective and policy set.
	4.1.2.5 *Residential development incorporates sustainable features and technologies.* *4.1.2.5a* *Development must encourage the efficient use of energy and water, by:* *Incorporating water-sensitive techniques.* *Off-setting the effects of loss of permeable surface* *Reducing the use of reticulated electricity.* *Utilizing solar energy.* *Providing for electric mobility and its associated charging infrastructure.*	Support in part	The policy set reads as though development must incorporate the matters referenced, such as solar energy, when the explanation suggests development may incorporate such matters. We seek Policy 4.1.2.5a be amended as follows to clarify this: *4.1.2.5a* *Development must encourage the efficient use of energy and water, <u>for example</u> by:* *…*
4.2 General Residential Zone	***4.2.2.2*** *The General Residential Zone and development within it provide for a variety of housing types and sizes that respond to* *i. Housing needs and demand; and* *ii. The neighbourhood's planned urban built character, including 1 to 3 storey buildings.* *4.2.2.2a* *Enable a variety of housing typologies with a mix of densities within the zone, including 1, 2 and 3-storey attached and detached residential units.* *4.2.2.2b* *Recognise that development in accordance with the General Residential Zone will have adverse effects, in some instances substantial, on existing*	Support	The Submitter supports this objective and policy set as it promotes a range of housing typologies and allows for higher density development. In particular policy 4.2.2.2b also promotes and effects-based management system where the adverse effects of development can be offset by positives.

	development and neighbours, and (except where a neighbour has provided written approval to a proposal): *i. Subject to (ii) below, ensure that development with adverse effects, greater than those enabled by the General Residential Zone on a neighbour, will achieve an equivalent or greater overall standard of on-site amenity for that neighbour compared to development in accordance with what the General Residential Zone could be reasonably anticipated to result in.* *ii. Where a proposal cannot satisfy (i) above, avoid adverse effects beyond those that could result from development in accordance with what the General Residential Zone could be reasonably anticipated to result in except where substantial off-setting positive effects are proposed.* *4.2.2.2c* *Higher-density residential development is located close to neighbourhood centres, parks, open spaces, and other areas of high social amenity.*		
4.2.3 Rules – General Residential Zone	***4.2.3.1*** ***Activity status table*** *…* *f. 1 to 3 residential units on a site* *f. 4 or more residential units on a site* *…*	Support	The Submitter supports provision for 3 residential units to be established on a site as a permitted activity as it will allow for intensification and a more compact and sustainable city. The submitter also supports 4 or more units on a site as a restricted discretionary activity as it acknowledges such development is provided for within the zone.
4.2.4 Rules – notification	*Except as set out below, all proposals for consent will be subject to the normal notification tests of the RMA 1991 as set out in Chapter 1.1.9:* *Section with proposed Plan Change end* *Section with proposed Plan Change start* *i. Proposals for 1 to 3 dwellings on a site that infringe no more than two of the standards set out in 4.2.5 excluding the height in relation to boundary standard, and where the degree of infringement of each of the standards is no greater than 10% of the standard(s) in question, shall be processed without public or limited notification.* *ii. Proposals for 1 to 3 dwellings on a site that infringe no more than two of the standards set out in 4.2.5 excluding the height in relation to boundary standard but to an extent greater than specified in (i) above, or that infringe the height in relation to boundary standard, or that otherwise infringe three or more of the standards set out in 4.2.5 (including the height in relation to boundary standard), may be limited notified to the owners and occupants of adjoining sites.* *iii. Proposals for 4 or more dwellings that do not comply with one or more*	Support	The submitter supports the introduction of these notification rules as they outline a clear path for a more streamlined planning process for developers without the risk of notification. This same submission point is sought for the corresponding rule in the Medium Density chapter.

	of the standards set out in 4.2.5, but where the extent of infringement is greater than 10% of the standard(s) in question and less than 25% of the standard(s) in question may be limited notified to the owners and occupants of adjoining sites. *iv. Proposals for 4 or more dwellings that do not comply with one or more of the standards set out in 4.2.5, but where the extent of infringement is greater than 25% of the standard(s) in question may be publicly notified.*		
4.2.5 Rules – General Standards – General Residential Zone.	***4.2.5.1 Density*** *…*	Support in part	The submitter generally supports these provisions and acknowledges that the 3 waters standards largely dictate density; however, this isn't explicitly clear. We seek that an advice note (or similar) be included to direct users to the 3 waters standards so they are made aware that consents could be required if the density exceeds 200m^2. This same submission point is sought for the corresponding rule in the Medium Density chapter.
	4.2.5.2 ***Building Coverage*** *All residential units (except for terrace housing units and apartment units where onsite parking is provided and accessed by a rear lane then 4.2.5.2. b. applies).* *50%* *Maximum building coverage for any terrace housing units and apartments where onsite parking is provided and accessed by a rear lane* *60%* *All other activities* *40%*	Support in part	The Submitter supports the increase in maximum building coverage. The increase will provide additional flexibility in development design.
	4.2.5.3 ***Permeability and Landscaping*** *Permeable surface: Minimum 30% of a site* *A residential unit at ground floor level must have a landscaped area of a minimum of 20% of the total site with grass or plants, and can include the canopy of a tree regardless of the ground treatment below them.* *On front, corner sites and through sites, landscaping planted in grass, shrubs and trees required forward of the front building line.* *Single residential units and duplex residential units and apartment buildings:* *Minimum 50%*	Support in part	The Submitter supports the retention of the 30% minimum permeability for the site; however, the Submitter considers the requirements for a specific number of trees to be planted is too prescriptive and too restrictive for the consent stage and should be edited to provide more flexibility for those doing development. The comprehensive developments could be better designed to incorporate trees throughout the development rather than trying to fit them into each site. The Submitter seeks the following changes: *Urban trees* *Each development shall provide trees in an unobstructed area*

	Terrace housing with a residential unit frontage width 7.5m or greater: Minimum 40% *Terrace housing with a residential unit frontage width of less than 7.5m: Minimum 30%* *Urban trees* *Each development shall provide trees in an unobstructed area within the site, clear of any required vehicle access and manoeuvring, regardless of the ground treatment below the canopy of the tree, at the rate set out below:* *Detached residential unit: Two per residential unit.* *Duplex residential unit: Two per residential unit.* *Terrace housing unit: One per residential unit.* *Apartment buildings: Minimum of one tree per site with an additional tree for every 200m² of site area.* *All other activities: Minimum of one tree per site with an additional tree for every 200m² of site area.* *Specimen trees shall be planted as per 4.2.5.3d at a planted size of at least 80L.*		*within the site, clear of any required vehicle access and manoeuvring, regardless of the ground treatment below the canopy of the tree, at the rate set out below:* *Detached residential unit: ~~Two~~ one per residential unit.* *Duplex residential unit: ~~Two~~ one per residential unit.* *Terrace housing unit: ~~One per residential unit.~~ Minimum of one tree per every 200m² of site area.* *Apartment buildings: Minimum of one tree per ~~site with an additional tree for~~ every 200m² of site area.* *All other activities: Minimum of one tree per ~~site with an additional tree for~~ every 200m² of site area.* *Specimen trees shall be planted as per 4.2.5.3d at a planted size of at least 80L*
	4.2.5.4 ***Building Height*** ***…***	Support	The Submitter supports the increase in minimum height as they allow for more flexibility in building design and potentially more efficient use of land.
	4.2.5.5 ***Height in Relation to Boundary*** ***…***	Support	The Submitter supports the changes to the height in relation to boundary standards as they allow for more flexibility in building design and potentially more efficient use of land.
	4.2.5.6 ***Building Setbacks*** ***…***	Support	The Submitter supports the changes to the setback standards as they allow for more flexibility in building design and potentially more efficient use of land.
	4.2.5.7 ***Boundary Fences and Walls*** *a. Front and side boundary fences or walls located forward of the front building line of the residential unit: Maximum height 1.2m or 1.5m provided 50% of that part over 1.2m is visually permeable.* *b. Boundary fences or walls adjoining Open Space Zone: 1.5m (with 50%*	Support in part	The submitter supports the inclusion of points d and e as they provide clarity for an often-debated issue during the resource consent stage. The Submitter opposes point *a* as it is too restrictive. Many properties have living courts located to the front of the dwelling and 1.8m high fencing should be allowed for

	permitted at 1.8m provided 50% of that part over 1.5m is visually permeable). *…* *d. Where a retaining wall and front fence are proposed, the maximum height of the combined structure measured from the bottom to top, shall be no more than 1.5m before the following shall apply:* *i. Between 1.5m – 2.5m: A horizontal step at least 1m in depth shall be integrated into the structures no more than 1.2m above the level of the street boundary.* *ii. Between 2.51m – 3.5m: Two horizontal steps, each at least 1m in depth, shall be integrated into the structures no more than 1.2m above the ground level at the base of each 'step'.* *iii. More than 3.5m: discretionary activity.* *e. This rule shall not apply to any fence and/or wall which:* *i. Following construction will be located at or below the natural ground level of the land that existed prior to construction commencing; or* *ii. Is internal to a proposed development and does not result in any fence or wall which has a height of 1.8m or more in relation to natural ground level of any adjoining external property boundary not in common ownership.*		property owners who seek to retain privacy. The submitter would be happy with amendments similar to the below: *a. Front and side boundary fences or walls located forward of the front building line of the residential unit: Maximum height ~~1.2m or 1.5m~~ 1.8m provided 50% of that part over ~~1.2~~ 1.5m is visually permeable.*
	4.2.5.8 ***Public Interface*** *a. Where a residential unit is facing the street it must have:* *A minimum 20% of the street-facing façade at ground level in glazing. This can be in the form of clear-glazed windows or doors.* *…* *c. …* *d. …* *e. …* *…*	Support in part	The Submitter is generally supportive of providing a public interface the promotes safety and improves amenity but not to the extent that it impedes practicality. Standard '*a'* requires 20% of the ground level to be in glazing but has no restrictions on the upper levels. Ground floor levels may struggle to meet this standard if a garage is provided and the requirement to have windows or doors overlooking the street should be able to be provided as well as parking. The Submitter seeks that point '*a'* be amended to: *a. Where a residential unit is facing the street it must have:* *A minimum 20% of the street-facing façade ~~at~~ across the ground level and first level in glazing. This can be in the form of clear-glazed windows, balconies or doors.* Subclauses 'c', 'd' and 'e' are also too prescriptive. A simple minimum width would suffice(i.e., 1.5m).
	4.2.5.9 ***Outlook Space***	Support	The Submitter supports this standard as it requires an outlook space to be provided for all windows.

	…		
	4.2.5.10 ***Outdoor Living Area*** ***…***	Support	The Submitter supports a reduction in living court size as it enables more development options and can increase yield.
	4.2.5.11 ***Waste Management and Service Areas*** ***…***	Support in part	The Submitter supports the service area standards for residential units, as the standards acknowledge that a large area is not necessary for most households, and that they provide flexibility for developments to provide service areas and waste management facilities in a way that suits the proposed development.
	4.2.5.13 ***Accessory Buildings, Vehicle Access and Vehicle Parking*** *…* *d. Where the residential unit has a frontage width facing a street or a publicly accessible on-site access way (for pedestrians) equal to or less than 7.5m: no garage or car port spaces within the dwelling's frontage is permitted and and any vehicle access and garaging is to be provided by a rear lane.* *…*	Oppose	The Submitter opposes standard '*d*' to the extent that garages cannot be provided at the street frontage on sites with a small frontage. The Submitter notes that for many smaller sites a rear access for car parking is not possible, and developers should be able to provide parking for each unit if they wish. Other rules control the portion of windows facing the street (i.e., public interface) and this should dictate whether a garage is able to be provided. The Submitter seeks that sub-clause 'd' be removed.
	4.2.5.14 ***Built Form*** *a. No wall which is parallel to or up to an angle of 30o to any external boundary except the road frontage shall exceed 15m in length without there being a step in (or out) plan of at least 1.8m depth and 4m in length.*	Oppose	The Submitter is not sure what this standard achieves. Walls and fences are already sufficiently controlled by other rules.
Medium density Zone	***Purpose*** ***…***	Support in part	The Submitter generally supports the inclusion of the Medium-Density Residential Zone (MDRZ) in Hamilton City, to the extent that it promotes intensification around urban centers as this will achieve the NPSUD. The submitter considers that there should be a noticeable increase in density and height allowed in the medium density zone when compared to the General Residential zone as the MDRZ is more appropriately located around urban centers.
	4.3.4.4 ***Building Height*** ***…***	Support	The submitter supports the increased height of 15m as it differs from that of the General Residential Zone and will allow for more intensification in appropriate areas.
High density zone	***Purpose*** *…*	Support in part	The Submitter generally supports the inclusion of the High-Density Zone in Hamilton City. Notwithstanding the general support for this zone and its

			purpose, the Submitter considers that the type of buildings that are intended for the zone should be enabled as permitted activities without the automatic need for consent (similar to the medium density and general residential zones). Currently, the general residential and medium density residential zones do not require consent for 3 x3 story buildings on a site but the high density zone does. The Submitter seeks the following change to the proposed purpose: *The design and layout of sites and buildings in the High Density Residential Zone are critically important. Resource consent ~~is~~ may be required to ensure that development provides for high quality urban design and visually attractive buildings, and that adequate on-site amenity and privacy consistent with the expected urban built character of the Zone is provided for.*
	4.4.3.1 ***Activity Status Table*** ***…***	Support in part	The submitter acknowledges that there is no provision for permitted activity residential units in this zone. Whilst we support the direction for improve amenity in these areas, this may discourage development and see it establish in other zones first where consent may not be required. Given these zones are generally intended to be developed first, this may create issues. We seek that Council reconsider the activity table for the high density zone with this in mind.
	4.4.5 ***Rules - General Standards*** ***4.4.5.1*** ***Density*** ***…***	Support	The submitter supports the minimum density standards.
	4.4.5.2 ***Building Coverage***	Support	The submitter supports the 60% maximum building coverage.
	4.4.5.3 ***Permeable Surface and Landscaping*** *…* *i. Terraces and/or Apartments: Minimum of one tree per site with an additional tree for every 150m² of site area.* *…*	Support in part	The submitter generally supports the permeability and landscaping provisions but seeks that the urban trees provisions (c) are amended as follows: *i. Terraces and/or Apartments: Minimum of one tree ~~per site with an additional tree~~ for every 150m² of site area.* For an apartment building with multiple units on multiple

			stories it may be impractical to provide a tree for every unit.
	4.4.5.4 ***Building Height*** *…*	Support	The submitter supports the standards as they promote development options.
	4.4.5.5 ***Height in Relation to Boundary*** *…*	Support	The submitter supports the standards as they promote development options.
	4.4.5.6 ***Building Setbacks*** *…*	Support	The submitter supports the standards as they promote development options.
	4.4.5.7 ***Fences and Walls*** *a. Transport corridor boundary and side boundary fences or walls located forward of the front building line of the building: Maximum height 0m* *…*	Support in part	The submitter generally supports these provisions but opposes standard a. Units at the ground floor should be able to have fencing to help screen living areas. We seek the following change: *a. Transport corridor boundary and side boundary fences or walls located forward of the front building line of the building: Maximum height ~~0m~~ 1.8m provided the fencing is 50% visually permeable.*
	4.4.5.8 ***Public Interface*** *a. Where a residential unit is facing the street it must have:* *i. A minimum 20% of the street-facing façade at ground level in glazing. This can be in the form of clear-glazed windows or doors.* *ii. At least one habitable room of the residential unit shall have a clear-glazed window facing the transport corridor from which vision toward the transport corridor is not blocked by any accessory building. For corner and through sites this shall be required only on the frontage from which pedestrian access is provided (front door).* *…*	Support in part	The Submitter supports the intent of this standard but seeks the wording be amended as follows to allow for more flexibility at the ground floor (i.e., garaging). *i. A minimum 20% of the street-facing façade ~~at~~ across the ground level and first level in glazing. This can be in the form of clear-glazed windows, balconies or doors.*
	4.4.5.9 ***Outlook Space*** *…*	Support	The Submitter supports the provision for outlook spaces.
	4.4.5.10 ***Outdoor Living Area*** *…*	Support	The submitter supports the outdoor living standards as they are suitable for apartment buildings and higher density development.
	4.4.5.11 ***Waste Management and Service Areas*** *…*	Support	The Submitter supports the service area standards for residential units, as the standards acknowledge that a large area is not necessary for most households (particularly apartment living), and that they provide flexibility for developments to provide service areas and waste

			management facilities in a way that suits the proposed development.
	4.4.5.13 ***Accessory Buildings, Vehicle Access and Vehicle Parking*** *…* *c. Where the residential unit has a frontage width facing a street or a publicly accessible on-site access way (for pedestrians) greater than 7.5m but less than 12m:* *One single-width garage or car port space, and one driveway / parking pad up to 3.5m wide may be provided.* *d. For terrace housing developments containing no more that 6 terrace housing units, where the individual residential units have a frontage width equal to or less than 7.5m, then one external parking pad may be provided in the front yard up to 3.5m wide and no less than 5.5m deep for each residential unit where the following are met:* *It must be an unenclosed parking pad and shall not be enclosed into a carport or garage at any time.* *Access to the parking pads shall be restricted to local roads or publicly accessible on-site access ways of no less than 7m in width,* *The development must comply with the requirements for permeable surface standards in Rule 4.4.5.3 and the boundary fencing and wall standards in Rule 4.4.5.7, and* *Each residential unit must have at least one habitable room with clear glazed window facing the local road in accordance with Rule 4 4.5.8*	Support in part	The submitter opposes the fact that garages cannot be provided at the ground floor for dwellings with a small road frontage. Active street fronts and CPTED principles can be included on sites as well as garages and this should not be restricted. We seek the following: *c. Where the residential unit has a frontage width facing a street or a publicly accessible on-site access way (for pedestrians) ~~greater than 7.5m but~~ less than 12m:* *One single-width garage or car port space, and one driveway / parking pad up to 3.5m wide may be provided.* *~~d. For terrace housing developments containing no more that 6 terrace housing units, where the individual residential units have a frontage width equal to or less than 7.5m, then one external parking pad may be provided in the front yard up to 3.5m wide and no less than 5.5m deep for each residential unit where the following are met:~~* *~~It must be an unenclosed parking pad and shall not be enclosed into a carport or garage at any time.~~* *~~Access to the parking pads shall be restricted to local roads or publicly accessible on-site access ways of no less than 7m in width,~~* *~~The development must comply with the requirements for permeable surface standards in Rule 4.4.5.3 and the boundary fencing and wall standards in Rule 4.4.5.7, and~~* *~~Each residential unit must have at least one habitable room with clear glazed window facing the local road in accordance with Rule 4 4.5.8~~*
	4.4.5.14 ***Built Form*** *…*	Oppose	The submitter opposes standard sub-clause '*c*' as a 4m setback is it very restrictive and would potentially consume a relatively large amount of buildable area on smaller sites. Whilst it is acknowledged that amalgamation between sites is encouraged in this area, many existing properties of a reasonable area can accommodate 3+ stories, however, requiring a 4m setback would potentially compromise good design outcomes for a new build. The Submitter considers that other controls of the zone (such as setbacks, outlook space and living area) can sufficiently

			control the built form. The Submitter seeks that sub-clause is removed. In addition to the above, the Submitters considers that this standard should be acknowledged in the setback standards.
Chapter 23 Subdivision			
23.2 Objectives and Policies: Subdivision	*23.2.3* *High and Medium-Density Residential Zones (excluding Rotokauri North) and Rototuna Town Centre Zone areas are developed comprehensively.* *23.2.3a* *Subdivision that creates additional allotments in the Medium-Density Residential Zone (excluding Rotokauri North) or the Rototuna Town Centre Zone does not occur without an approved Comprehensive Development Plan or Land Development Consents for Ruakura and Te Awa Lakes.* *23.2.3b* *Ensure the development of Medium and High Density Residential Zones occur in a comprehensive and integrated manner by requiring subdivision to:* *i. Integrate and connect with existing development.* *Provide opportunities for connection into adjacent sites in locations that are feasible and support the creation of a well-connected and integrated urban environment.*	Support	The submitter supports this provision to the extent that it promotes an integrated approach to development in the high-density zone.
	23.2.5 *Subdivision occurs in a manner that recognises historic heritage and natural environments.* *23.2.5a* *Subdivision avoids, remedies or mitigates adverse effects on:* *Scheduled heritage items.* *Scheduled archaeological and cultural sites.* *Scheduled significant trees.* *Scheduled significant natural areas.* *The Waikato River and gullies and river banks, lakes, rivers and streams.* *23.2.5b* *Subdivision enables development while managing effects on any:* *Landforms and natural features.* *Vegetation.*	Support	The submitter supports this objective and policy set to the extent that it promotes an effects-based approach to assessing development in the vicinity of HHAs, SNAs or other features.
23.3 Rules – Activity Status Tables	*v. Fee simple subdivision that complies with Rule 23.7.2 b) within the General, Medium Density and High Density Residential Zones (Excluding subdivision provided in xii, xiii, and xiv).* : C*	Support	The Submitter supports subdivision being a Controlled activity where they are accompanied by a land use consent or over an existing appropriately designed building. The appropriateness of such subdivisions are determined by

			the design and function of the underlying or proposed building, so this makes sense. Notwithstanding the above, it is not certain how permitted activity MRDS developments are to subdivided in the event than no resource consent is required.
23.7.1 Allotment Size and Shape	*a. Vacant lot - General Residential Zone (unless otherwise stated): 300m2 with 15m-diameter circle* *b. Vacant Lot - Medium Density Residential Zone (Except within the Rotokauri North Residential Precinct then Rule 23.7.1 q. applies): 1200m2 and 15m-diameter circle* *…* *c. Vacant Lot - High Density Residential Zone: 1200m2 withy Contain a rectangle of 15 metres by 20 metres* *…* *r. General Residential Zone within Historic Heritage Area (unless otherwise stated): Front, corner or through site – 600m2 and Rear site – 400m2 both with 15m diameter circle*	Support in part	The Submitter supports the reduction in minimum lot size for the general residential zone down to 300m^2. The submitter opposes the HHA minimum lot sizes and considered sites in such areas should retain the underlying lots sizes. We seek the following: ~~*r. General Residential Zone within Historic Heritage Area (unless otherwise stated): Front, corner or through site – 600m2 and Rear site – 400m2 both with 15m diameter circle*~~
23.7.3 General Residential Zone	*…* *e. Minimum private way width serving 1-6 allotments or residential units: 4m* *f. Minimum private way width serving 7 – 20 residential units where access forms common property under a unit title arrangement: 6m* *g. Minimum width of vehicle access (to be formed and vested as public road) serving 7-20 fee simple lots or residential units: 16.8m* *…*		The submitter seeks a change to minimum number of users per ROW. It is considered that a ROW should be able to serve up to 10 users without the need for a body corporate. Currently the ODP allows 7-9 users for fee simple subdivisions - but PC12 only allows 6, plus medium density zone allows 20 at 7m. The Submitter seeks that an additional rule be inserted to allow 6-10 users on a 7m wide access without a unit title arrangement with any consequential amendments as necessary. The Submitter considers that such a standard provides sufficient room for passing. *<u>f.</u> <u>Minimum private way width serving 7-10 allotments or residential units: 7m* *<u>g.</u> Minimum private way width serving ~~7~~ <u>11</u>– 20 residential units where access forms common property under a unit title arrangement: 6m* *h. Minimum width of vehicle access (to be formed and vested as public road) serving ~~7~~ <u>11</u> -20 fee simple lots or residential units: 16.8m*
23.7.4 Medium	*i. Minimum private way width serving 7-20 allotments: 7m*	Support	The Submitter supports up to 20 allotments being able to be served by a private way without a common property

<table>
<tr><td>Density Residential Zone (Excluding Peacocke Residential Precinct)</td><td></td><td></td><td>arrangement.</td></tr>
<tr><td>25.13 Three Waters</td><td></td><td></td><td></td></tr>
<tr><td>25.13.4.5 Water Conservation Measures</td><td>a. The following water conservation techniques shall be incorporated, connected to, achieved or maintained as part of any new development as identified below.
<table><tr><th>Where required</th><th>Water sensitive techniques</th></tr><tr><td>i. New residential units in a residential zone.
ii. Other new buildings in a residential zone containing a kitchen, laundry, toilet or bathroom.</td><td>• Provision for future installation of water metering infrastructure
• Use of low flow fixtures in kitchen, laundry, toilets and bathrooms
• Rainwater tank of minimum size of 3,000 litres for non-potable use (garden watering, toilet, laundry etc)</td></tr><tr><td>iii. Other new buildings in a non-residential zone containing a kitchen, laundry or bathroom.</td><td>• Provision for future installation of water metering infrastructure
• Use of low flow fixtures in kitchen, laundry, toilets and bathrooms</td></tr></table></td><td>Oppose</td><td>The Submitter opposes the provision for rainwater tanks to be provide for every new residential unit.
It is considered that a rainwater tank for every unit including a bathroom or kitchen seems excessive.
One tank per site is considered sensible, or alternatively having a rainwater tank requirement dictated by the floor area of dwellings on site could be considered.</td></tr>
<tr><td>25.13 Transport</td><td></td><td></td><td></td></tr>
<tr><td>25.14.4 Rules – General Standards</td><td>25.14.4.1
Vehicle Crossings and Internal Vehicle Access
h. Vehicle crossing and internal vehicle access shall:
i. Comply with the relevant dimensions identified in the Tables below
Vehicle crossing widths
<table><tr><th rowspan="2">Vehicle Crossings</th><th rowspan="2"></th><th colspan="2">Width (m)[1]</th></tr><tr><th>Minimum</th><th>Maximum</th></tr><tr><td>Residential Zones, except as provided below</td><td>Single residential unit (including ancillary residential unit)</td><td>3.0</td><td>3.5</td></tr><tr><td></td><td>2 or more residential units (including a duplex)</td><td>5.5</td><td>6.0</td></tr></table></td><td>Oppose</td><td>The maximum width is 3.5m, however the minimum legal width for an accessway is 4m.
The submitter considers that the maximum with should be moved to 4m for single units.
It is also noted that rear lanes are required to be 7m wide, so therefore provision for a 7m crossing should be provided.

Simply allowing crossings to be 3.5m-7m would simplify this rule.</td></tr>
<tr><td></td><td>25.14.4.3a
Travel Plan Requirements
a. A Travel Plan must be prepared and implemented where the following trigger thresholds are exceeded and:
i. A new building is constructed on previously vacant land, or
ii. A new use establishes on previously vacant land or within a vacant building, or
iii. An existing building is altered in a way that increases the gross floor area, or</td><td>Support in part</td><td>The Submitter supports provision for travel plans but only where there will be a notable increase in vehicle or people movements.
Currently, it is considered that the rule is overly restrictive in the ODP, and is unnecessary for many activities, such as single dwellings being constructed on vacant land or basic renovations.
The Submitter considers that travel plans should be kept to where 4 or more units are created, or where vehicle</td></tr>
</table>

	iv. An existing use increases in scale (e.g., increased gross floor area), or *v. The use of land or buildings changes to a use with a higher trip generation.*		movements are increasing by 30+ movements per day.
Planning Maps			
	Removal of Special Character Zones	Support	