SUBMISSION ON PUBLICLY NOTIFIED PROPOSAL FOR PLAN CHANGE 12 TO THE HAMILTON CITY DISTRICT PLAN

*under clause 6 of Schedule 1, Resource Management Act 1991 (**RMA**)*

To: Hamilton City Council
Municipal Building
Garden Place
HAMILTON
(by email: haveyoursay@hcc.govt.nz)

Name of submitter: The Adare Company Limited

1. The Adare Company Limited (**Adare**) makes this submission on proposed Plan Change 12 – Enabling Housing Supply to the Hamilton City District Plan (**PC12**). This submission relates to aspects of PC12 relating to the interface between new provisions and bespoke provisions for the Peacocke Precinct and citywide provisions for Financial Contributions, Residential, Subdivision, Transportation, Three Waters, Design Guides and Assessment Criteria.

Background

2. Adare is a family-owned company, held by the Peacocke family. The family has had ties to land in Peacocke, Hamilton since the 1880s.

3. Through Adare and other companies, the Peacocke family retains significant landholdings in the Peacocke Structure Plan area which are subject to Plan Change 5 – Peacocke Structure Plan (**PC5**).

4. In late 2021 and early 2022, Adare made a submission and further submission to PC5. Adare's submissions on PC5 include points concerning medium density development in Peacocke, incorporation of the Medium Density Residential Standards (**MDRS**), transportation and identification of Bat Habitat Areas (some of which are also identified as Significant Natural Areas) over Adare's landholdings and associated provisions. Adare's land also contains Archaeological Sites which are identified in the planning maps for PC5.

5. In September 2022, Adare made a submission on Plan Change 9 – Historic Heritage and Natural Environment (**PC9**). That submission relates to aspects of PC9 concerning the citywide provisions for Significant Natural Areas and Archaeological Sites.

6. Given the wide capture of PC12, Adare considers that the provisions and the outcomes they are seeking to achieve are interrelated with PC5 and PC9.

7. Adare's submissions on PC5, PC9 and PC12 are informed by the knowledge it has gained over many years in planning and consenting processes in Hamilton.

Submission

8. Adare supports the intent of PC12 to give effect to the National Policy Statement on Urban Development (**NPS-UD**) and implement the requirements of the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**Amendment Act**). PC12 goes further than the bare requirements of the NPS-UD and Amendment Act and introduces a range of new provisions. Adare's participation in PC12 is to ensure that it does not inadvertently cut across outcomes from PC5 and

PC9, nor unduly impact on greenfield development areas, such as the Peacocke Precinct.

9. Adare's submission seeks refinements to PC12, to:

   a. ensure that city-wide changes do not duplicate or conflict with outcomes for the Peacocke Precinct; and

   b. provide a fair and workable regime that enables the intensification of Hamilton.

10. Adare's detailed submissions, including reasons and relief, are provided in the table in **Appendix A** to this submission. In summary, Adare's submission seeks:

   a. amendments to the city-wide residential zone and subdivision provisions to avoid duplication or conflict with the comprehensive, bespoke provisions for the Peacocke Precinct;

   b. amendments to the assessment criteria, residential zone, transport, three waters and design guide provisions to improve their workability and ensure consistency with the outcomes anticipated by PC5 and PC9; and

   c. amendments to the proposed financial contributions regime to exclude greenfields development or, at least, the Peacocke Precinct.

11. Adare submits that the relief it seeks is necessary to:

   a. promote sustainable management of resources, achieve the purpose of the RMA and to give effect to Part 2 and other provisions of the RMA;

   b. enable the social and economic well-being of the community in Hamilton City;

   c. sustain the potential of the natural and physical resources of Hamilton City, including the Peacocke Precinct, to meet the reasonably foreseeable needs of future generations;

   d. enable the efficient use and development of the natural and physical resources;

   e. give effect to the objectives and policies of the National Policy Statement for Urban Development 2020; and

   f. ensure that the provisions of PC12 are the most appropriate way to achieve the objectives of PC12 and the District Plan, which are in turn the most appropriate way to achieve the purpose of the RMA.

Decision sought

12. Adare seeks the decisions from the Council as set out in the column in Appendix A headed "Decision Sought", as well as any consequential, alternative or further amendments necessary to the objectives, policies, rules, methods or other provisions of PC12 to give effect to the relief sought and reasons given.

13. Adare could not gain an advantage in trade competition from this submission.

14. Adare wishes to be heard in support of this submission.

Signed for and on behalf of Adare by:

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Mike Doesburg

Solicitor for **The Adare Company Limited**

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Appendix A – Detailed reasons and decisions sought

Glossary of abbreviations and terms used:

PC5 means Plan Change 5.

PC9 means Plan Change 9.

PC12 means Plan Change 12.

Council means Hamilton City Council.

SNA means Significant Natural Area.

PSPA means Peacocke Structure Plan area.

	Section of Plan and Provision Reference	Support/Oppose	Reasons	Decision Sought
Chapter 4 Residential Zones				
1.	Objectives 4.1.2.1, 4.1.2.2, 4.1.2.3, 4.1.2.4, 4.1.2.5, 4.1.2.6, 4.1.2.7 and 4.1.2.8 and the associated policies.	Oppose in part.	PC5 contains a comprehensive suite of objectives and policies for the Peacocke Precinct that have been tailored to that area. As notified, these objectives and policies are under the heading "All Residential Zones", so would apply to residential zones in the Peacocke Precinct. This creates duplicative and potentially conflicting objective and policy guidance. The additional objectives and policies in Chapter 4.1 should be excluded from applying to the Peacocke Precinct.	Add the following text under 4.1.2 Objectives and Policies: All Residential Zones: *"The following objectives and policies do not apply in the Medium Density Residential Zone: Peacocke Precinct (refer to 4.3A)".*
2.	Policy 4.1.2.5a – requirements for use of solar energy and provision for electric mobility and associated charging infrastructure.	Oppose in part.	As notified, the policy is relatively directive, requiring that development must encourage the efficient use of energy and water. However, PC12 does not include rules or assessment criteria requiring the reduced use of reticulated electricity or the use of solar energy. In terms of electric mobility and its charging infrastructure, the provision of such should be at the discretion of property owners / developers. See also submission 25.	Amend Policy 4.1.2.5a as follows: ***"4.1.2.5a*** *Development must encourage the efficient use of ~~energy and~~ water, by:* *i. Incorporating water-sensitive techniques.* *ii. Off-setting the effects of loss of permeable surface.* *iii. ~~Reducing the use of reticulated electricity.~~* *iv. ~~Utilizing solar energy.~~* *v. ~~Providing for electric mobility and its associated charging infrastructure."~~*
3.	Policy 4.1.2.6c – quality on-site amenity.	Oppose in part.	This policy is very long and reads like a list of assessment criteria. A specific matter which is opposed is clauses (xi) and (xii) which seek to limit vehicle crossings, particularly where narrow dwellings are proposed. While that may be appropriate in the context of shared paths and separated cycleways, it is otherwise an onerous requirement and is inconsistent with the outcomes of PC5.	Amend Policy 4.1.2.6c so that it is more succinct, with detailed matters covered in the assessment criteria. Alternatively, amend clause (xi) and delete clause (xii) of Policy 4.1.2.6c as follows: *"xi. Limit the number of vehicle crossings to prioritise pedestrian and cyclist safety and amenity on public roads or publicly accessible spaces used to give access to development where shared paths and separated cycleways are located.*

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				~~*xii. Use of private rear / service lanes, separate to the space forming the public front, associated with narrow-frontage dwellings so as to achieve (9) and (10).”*~~
4.	Policy 4.1.2.6i – Minimising vehicle crossings on road frontages where narrow dwellings are proposed.	Oppose in part.	For the same reasons as for submission 3 above, the policy should be limited to where shared paths and separated cycleways are located.	Amend Policy 4.1.2.6i as follows: ***“4.1.2.6i*** *Ensure vehicle crossings are minimized on road frontages ~~where narrow dwellings are proposed and~~ where shared paths and separated cycleways are located.”*
5.	Objective 4.1.2.7 – buildings and activities at the interface of residential zones with SNAs.	Oppose in part.	“Significant Natural Area” is a defined term in the District Plan and refers to areas identified in the planning maps and schedules. Reference to such areas should be capitalised to avoid ambiguity.	Amend Objective 4.1.2.7 as follows: ***“4.1.2.7*** *Buildings and activities at the interface of residential zones with ~~s~~Significant ~~n~~Natural ~~a~~Areas will be managed to ensure the ecological values of these areas are protected.”*
6.	Policy 4.1.2.7a – buildings and activities at the interface of residential zones with SNAs.	Oppose in part.	“Significant Natural Area” is a defined term in the District Plan and refers to areas identified in the planning maps and schedules. Reference to such areas should be capitalised to avoid ambiguity.	Amend Policy 4.1.2.7a as follows: ***“4.1.2.7a*** *Adverse effects of adjoining development on identified ~~s~~Significant ~~n~~Natural ~~a~~Areas shall be managed through limiting earthworks and controlling vegetation maintenance to reduce the impact on their ecological values.”*
7.	Purpose 4.3.1 – development in the Peacocke Precinct is subject to Chapter 4A Peacocke Medium Density Residential Zone.	Support.	Development in the Peacocke Precinct is subject to Chapter 4A Peacocke Medium Density Residential Zone, which has been tailored for that area. It is appropriate to be clear about this to avoid duplication or conflict with the “general” Medium Density Residential Zone.	Retain as notified.

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Chapter 23 Subdivision				
8.	Purpose 23.1 – subdivision within the Peacocke Precinct is subject to Chapter 23A.	Support.	Subdivision in the Peacocke Precinct is subject to Chapter 23A Subdivision – Peacocke Precinct, which has been tailored for that area. It is appropriate to be clear about this to avoid duplication or conflict with the "general" subdivision provisions.	Retain as notified.
Chapter 24 Financial Contributions				
9.	24.3 Objectives and policies; Rule 24.4 Financial Contribution Rules, including 24.4.1 General Rules, 24.4.2 Residential Development, 24.4.3 Non-residential Development, 24.4.4 Contribution of Land and 24.4.5 Contribution of Land and Money.	Oppose.	The proposed new financial contribution regime is targeted at managing effects from intensification in urban areas on three waters / transport, parks / reserves / open space, streetscape amenity and giving effect to Te Ture Whaimana. In contrast, development in greenfield areas will be designed to accommodate anticipated densities in accordance with best practice requirements (including under ICMPs, the RITS, Stormwater Guidelines etc). Parks / reserves / open space and streetscape amenity is also planned and provided for. If such infrastructure is not developer-funded, it is funded by development contributions. The proposed new financial contribution regime fails to recognise this distinction. Instead, it appears to expect a financial contribution from all new development. It is unreasonable to expect financial contributions from greenfield development, which has not contributed to the effects that the regime seeks to manage. The regime should be amended to exclude greenfield areas or at least the Peacocke Precinct.	Amend the objectives, policies and rules to exclude the financial contributions regime from applying to greenfield development. As an alternative to the relief requested above, amend the objectives, policies and rules so that the Peacocke Precinct is excluded.

	Section of Plan and Provision Reference	Support/Oppose	Reasons	Decision Sought
10.	Definition for 'Greenfield development' under the Interpretation heading in Chapter 24.	Oppose in part.	Including a definition of "Greenfield development" is supported, however, the term is not currently referred to in the provisions of Chapter 24 (see submission 9). Hamilton has clearly defined greenfield precincts. The definition could be improved by clarifying that it includes development in those precincts, as well as any other previously undeveloped rural land.	Retain a definition for 'Greenfield development' in Chapter 24 and amend it as follows: *"**Greenfield development** means subdivision and/or urban development in the Peacocke Precinct, Te Awa Lakes Precinct, Rotokauri Precinct, Rotokauri North Precinct, Ruakura Precinct and Rototuna Town Centre Precinct and of any other previously undeveloped rural land".* As an alternative or in addition to the above, the greenfield development areas could be spatially defined in the Planning Maps.
Chapter 25.13 Three Waters				
11.	Objective 25.13.2.2 and Objective 25.13.2.5 – health and wellbeing of the Waikato River.	Oppose in part.	These objectives both address similar matters relating to the health and wellbeing of the Waikato River. The two objectives should be consolidated into one objective with associated policies.	Amend Objectives 25.13.2.2 and/or 25.13.2.5 so that they are consolidated into a single objective for the health and wellbeing of the Waikato River.
12.	Policy 25.13.2.2b – financial contributions (three waters).	Oppose.	For the reasons given in submission 9, the policy should be amended to exclude greenfield development from the financial contributions regime.	Amend Policy 25.13.2.2b as follows: *~~"In accordance with Chapter 24,~~ Except for greenfield development, require a financial contribution in accordance with Chapter 24 when off-site stormwater works are needed in a sub-catchment to avoid, remedy, or mitigate the adverse effects of development or to restore and protect the health and wellbeing of the Waikato River."*
13.	Policy 25.13.2.5h – financial contributions (three waters).	Oppose.	Policy 25.13.2.5h is identical to Policy 25.13.2.2b. One of these policies should be deleted. This should be addressed as part of the consolidation of Objective 25.13.2.2 and Objective 25.13.2.5 (see submission 11).	Delete Policy 25.13.2.5h. ***~~"25.13.2.5h~~*** *~~In accordance with Chapter 24, require a financial contribution when off-site stormwater works are needed in a sub-catchment to avoid, remedy, or mitigate the~~*

	Section of Plan and Provision Reference	Support/Oppose	Reasons	Decision Sought
				~~*adverse effects of development or to restore and protect the health and wellbeing of the Waikato River."*~~
14.	Policy 25.13.2.6a – design	Oppose in Part.	Soakage to ground will not be possible in some areas of Hamilton. This policy should be amended to refer to use of soakage techniques "where practicable".	Amend clause vi of Policy 25.13.2.6a as follows: *"vi. Ensure that surface water runoff is appropriately managed to restore and protect the health and well being of watercourses and the Waikato River, primarily via retention for reuse and soakage techniques <u>where practicable</u>".*
15.	Rule 25.13.4.2A Stormwater – Residential Zones.	Oppose in Part.	The clarity of this rule would be improved by specifying that it relates to "on-lot" stormwater management measures rather than communal stormwater management measures which are typically vested in HCC.	Amend clause (c) in Rule 25.13.4.2A as follows: *"c. <u>On-lot</u> stormwater management measures must be maintained and operated in perpetuity in accordance with best practice by the relevant property owner".*
Chapter 25.14 Transportation				
16.	Policy 25.14.2.1b – climate change.	Oppose.	There are numerous competing demands on transport corridor space, including creating functional transport corridors, providing for other infrastructure, public transport stops, street furniture and so on. It is impractical and unlikely to be achievable to establish and maintain continuous tree canopy along transport corridors.	Delete Policy 25.14.2.1b. ~~***"25.14.2.1b***~~ ~~*Promote the establishment and maintenance of a continuous tree canopy along transport corridors to improve amenity for corridor users and adjoining land use, minimize the urban heat island effects of urban intensification, enhance biodiversity and ecological function, provide summer share to make these corridors more comfortable for walking, cycling, and micro-mobility during hotter weather, and store carbon."*~~
17.	Policy 25.14.2.1h – parking.	Oppose in part.	It is unclear whether this policy is intended to apply to on-street parking, off-street parking or both. The policy also addresses loading despite the heading of the policy being "Parking". For clarity, the policy should be amended to relate to off-street parking and loading as on-street parking is unlikely to be able to achieve all of the outcomes sought. In addition:	Amend Policy 25.14.2.1h as follows: ***"<u>Off-Street</u> Parking <u>and Loading</u>*** ***25.14.2.1h*** *Manage the design, location, quantity, and pricing of any <u>off-street</u> parking <u>and loading</u> infrastructure <u>so that it is</u> provided in a way that:*

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			• clause (i) should be amended to be clearer; • clause (v) should be amended to enable consideration of the need for charging facilities, rather than mandating them; • clause (vi) and (viii) should be deleted as parking and loading areas are unlikely to meaningfully contribute to these outcomes; • clause (vii) should be amended to refer to loading and drop-off spaces only where they are "required" by the District Plan.	i. ~~*Provides for the special design, personal security, accessibility, and convenience requirements of all users.*~~ *Is safe, convenient and accessible for all users.* *ii. Minimises adverse effects arising from supply of and demand for parking.* *iii. Minimises adverse safety and efficiency effects on walking, cycling, micro-mobility, public transport, freight and emergency services.* *iv. Maximises opportunities for the efficient use of parking infrastructure.* *v.* ~~*Provides*~~ *Considers the need for charging facilities for electric powered vehicles and micro-mobility devices.* ~~*vi. Encourages active modes, micro-mobility and public transport.*~~ *vii. Ensures any required loading and drop-off spaces are available for each development and site.* ~~viii. *Provides for car-share, taxis, and ride-share.*"~~
18.	Policy 25.14.2.1j – public transport.	Oppose in part.	Clause (vi) should be amended to clarify that the requirement for public transport infrastructure applies only to public transport routes.	Amend clause (vi) of Policy 25.14.2.1j as follows: *"vi. Providing public transport infrastructure on public transport routes as part of developing a new, or upgrading an existing, transport corridor."*
19.	Policy 25.14.2.1l – adverse effects on the transport network.	Oppose in part.	For the reasons in submission 16 clause (iii) should be amended to remove reference to continuous tree canopy along transport corridors.	Amend clause (iii) of Policy 25.14.2.1l as follows: *"iii. Promoting streetscape amenity through transport corridor design, and providing for the Transport Mode Hierarchy,* ~~*and encouraging a continuous tree canopy along transport corridors."*~~
20.	Policy 25.14.2.1o – access	Oppose in part.	For the reasons given in submission 3, clause (vi) should be amended to clarify that it relates to areas that have physically separated cycleways and shared paths.	Amend clause (vi) of Policy 25.14.2.1o as follows:

	Section of Plan and Provision Reference	Support/Oppose	Reasons	Decision Sought
				"vi. Minimise the number of vehicle crossings <u>over physically separated cycleways and shared paths</u> to improve safety for walking, cycling, and micro-mobility".
21.	Policy 25.14.2.1q – biodiversity in transport corridors.	Oppose in part.	It is not practical or realistic to expect roads to function as ecological corridors. The policy should be amended to remove the expectation that transport corridors will function as ecological corridors.	Amend Policy 25.14.2.1q as follows: ***"25.14.2.1q*** *Encourage the planting, retention, and maintenance of indigenous trees and vegetation within transport corridors, where appropriate, to recognise and reflect ecological, amenity, cultural, and landscape values ~~and to support the establishment and enhancement of ecological corridors~~."*
22.	Rule 25.14.4.1(h)(i), (iii) and (iv) – vehicle crossings and internal access.	Oppose in part.	The design and access widths proposed conflict with standards that have been proposed for the Peacocke Precinct under PC5. The rule should be amended to clarify that the standards do not apply in the Peacocke Precinct.	Amend Rule 25.14.4.1(h) to state that the standards in clauses (i), (iii) and (iv) do not apply in the Peacocke Precinct.
23.	Rule 25.14.4.1(j) – rear lanes.	Oppose in part.	Different rear lane standards have been proposed for the Peacocke Precinct through PC5. The rule should be amended so that the standards that apply in other parts of the city do not apply in the Peacocke Precinct.	Amend Rule 25.14.4.1(j) to state that the standards do not apply in the Peacocke Precinct.
24.	Rule 25.14.4.1(m) and (n) (including Figures 25.14.4.1e and 25.14.4.1f) – vehicle access requirements.	Oppose in Part.	The standards for the required splays at residential driveways and on-site platforms are unnecessarily onerous. Safe outcomes could be achieved with less restrictive standards.	Amend Rule 25.14.4.1(m) and (n) as follows: *"m. To ensure that drivers exiting the site have clear visibility to pedestrians, cyclists, and micro-mobility users, splays of ~~5m~~ <u>2.5m</u> by 2m which are clear of structures higher than 1.2m must be provided at all vehicle crossings. See Figure 25.14.4.1e.* *n. Where a vehicle access joins a transport corridor it must have an on-site platform at least ~~6m~~ <u>4.5m</u> long and with a gradient no steeper than 1 in ~~20~~ <u>10</u> (~~5~~ <u>10</u> per cent) so that vehicles can stop safely and check for pedestrians, cyclists, micro-mobility users, and other*

	Section of Plan and Provision Reference	Support/Oppose	Reasons	Decision Sought
				vehicles before entering the transport corridor. See Figure 25.14.4.1f." Amend Figures 25.14.4.1e and 25.14.4.1f to reflect the changes above.
25.	Rule 25.14.4.2b Electric Vehicle Charging.	Oppose.	This rule requires an electric vehicle charging point for each vehicle parking space provided for all new residential activities with on-site vehicle parking. The rule is overly prescriptive and adds unnecessary costs. Garages are likely to have power available so that residents can easily install charging facilities if they have an electric vehicle.	Delete Rule 25.14.4.2b and the associated note. *"~~**25.14.4.2b Electric Vehicle Charging**~~* *~~a. All new residential activities with on-site vehicle parking must provide an electric vehicle charging point for each vehicle parking space required.~~* *~~**Note**~~* *~~An electric vehicle charging point excludes the charging cable that connects between a residential unit's electrical outlet and the electric vehicle. The owner or driver of the electric vehicle is expected to provide this.~~"*
26.	Rule 25.14.4.3a Travel Plan Requirements.	Oppose in part.	Travel Plans are required for a range of activities, including apartment buildings and many commercial activities (typically large-scale activities). Policy 25.14.2.1n refers to Travel Plans being required for development or activities of a nature, scale or location that has the potential to generate significant movement of people. Requiring Travel Plans for small Apartment buildings which generate insignificant movement of people would be inconsistent with this policy. A threshold of apartments with 20 units would be consistent with the travel plan requirement for places of assembly of 1000m^2, which would generate 100 vehicles per day. That is the same as the anticipated generation of 20 apartment units.	Amend Rule 25.14.4.3a so that Travel Plans are only required to be prepared and implemented for Apartment buildings where they involve 20 or more units.

	Section of Plan and Provision Reference	Support/Oppose	Reasons	Decision Sought
Appendix 1.3 Assessment Criteria				
27.	Appendix 1.3.3 Restricted Discretionary, Discretionary and Non-Complying Assessment Criteria.	Oppose in Part.	1. PC5 contains a comprehensive suite of assessment criteria for subdivision and development in the Peacocke Precinct that have been tailored to that area. As notified, many of the proposed assessment criteria in PC12 would apply to subdivision and development in the Peacocke Precinct. The assessment criteria should be amended so that they do not conflict with PC5. 2. The proposed amendments to the assessment criteria use inappropriate and unclear terminology such as "as a rule of thumb". 3. Many of the amended assessment criteria read as though they are standards to be met rather than assessment criteria. 4. Changes should be made so that the assessment criteria use more appropriate words such as "the extent to which". 5. Consequential changes should be made to the assessment criteria to address other matters raised in this submission.	Redraft the assessment criteria in Appendix 1.3.3 to ensure they are vires, certain, capable of assessment and implementation and do not conflict with PC5.
28.	Appendix 1.3.3, G34 – rear lanes.	Oppose in part.	It is not appropriate for the district plan to require a contractual indemnity for collection of rubbish from rear lanes. The assessment criterion should be amended to be consistent with alternative drafting agreed through PC5.	Amend G34(a) as follows: *"a. An appropriate legal mechanism will be established for ownership and ongoing management and maintenance of the lane <u>including where applicable, provisions for use of the rear lane by public rubbish collection and recycling trucks</u> ~~and for providing indemnity for collection of rubbish, food scraps, and recycling (where collection vehicles are proposed to enter the rear lane)~~."*

	Section of Plan and Provision Reference	Support/Oppose	Reasons	Decision Sought
Appendix 1.4 Design Guides				
29.	Appendix 1.4.2 Residential Design Guide.	Oppose in Part.	The Residential Design Guide is proposed to be amended so that it will apply to all residential zones, rather than just the General Residential Zone. This will make it relevant to the Medium Density Residential Zone in Peacocke. Some changes to the Design Guide are necessary to improve the clarity of the Design Guide and to support good urban design outcomes.	Amend clause (a) and (c) in 1.4.2.6 as follows: *"a. Where possible, garages and car parking should not dominate the frontage. Garages and car ports ~~and~~ should be located to the side or rear or set back behind the main façade of the building to reduce visual impact (refer Figure 1.4.2e)."* And; *"c. Where possible, driveways of adjoining units should be paired. ~~should not be located side by side. Preferably use shared driveways~~* *ca. For access to rear lots, driveways should be shared where possible to serve more than one residential unit."* Amend clause (e), insert a new clause (f) and amend clause (g) in 1.4.2.13 as follows: *"e. Developments should be designed in a way that provides an appropriate level of on-site amenity ~~and outlook~~ through the ~~use of landscaping and~~ the provision of vegetated ~~green, communal~~ open spaces~~,~~ ~~careful~~ and building placement that takes into account solar orientation ~~in response and maintenance of privacy.~~"* *"f. Developments should be designed to provide an appropriate level of outlook through the way dwellings are arranged and orientated, and the way yards are dimensioned and located."* And;

	Section of Plan and Provision Reference	Support/Oppose	Reasons	Decision Sought
				"~~gh~~. Development should ensure any ~~integrated~~ common service space that is provided ~~that~~ is readily accessible to the residential units."
Appendix 15 Transportation				
30.	Appendix 15, Table 15-1a.	Oppose in part.	Table 15-1a introduces resident cycle requirements for a range of housing typologies that do not have garages. While the requirement is understandable for apartment buildings (to save residents needing to bring bicycles up stairs or lifts), it is unnecessary for ancillary residential units, single dwellings and duplex dwellings.	Amend Table 15-1a so that the requirement for resident cycle parking for residential activities only applies to Apartment buildings (not ancillary residential units, single dwellings and duplex dwellings).
Appendix 18 Financial Contributions				
31.	Appendix 18 Financial Contributions	Oppose.	Appendix 18 should be amended to exclude financial contributions from greenfield development for the reasons given in submission 9.	Amend Appendix 18 so that it states that financial contributions are not required in greenfield development areas. Alternatively, amend Appendix 18 so that financial contributions are not required in the Peacocke Precinct.