160 17th Avenue,
Tauranga South,
Tauranga 3112

classicgroup.co.nz
0508 4 252 774

Policy Planning Team
Hamilton City Council
Private Bag 3010
Hamilton 3204

Name of submitter: Classic Group
Contact person: Libby Gosling, Urban Design Manager
Date: 30 September 2022

This is a submission on Plan Change 12.

Classic Group welcomes the opportunity to submit on Plan Change 12.

The Classic Group of companies includes Classic Builders, and Classic Developments. Classic Builders is the second largest residential home builder in New Zealand. Classic Developments is our development company which undertakes a variety of commercial and residential developments throughout New Zealand. In terms of residential development, we undertake a combination of greenfields, brownfields redevelopment, medium density, and retirement villages. Though now nation-wide, our companies have started, and have our head offices in Tauranga.

Classic Group supports Plan Change 12 to the District Plan, but with appropriate amendments/deletions and further wording changes to address matters raised in our submission. These amendments/deletions and further changes are necessary to ensure that the plan change is sufficiently enabling so as to give effect to the National Policy Statement on Urban Development 2020 (NPS-UD).

Reason for Submission

Classic Group's submission is primarily focused on ensuring that Plan Change 12 is consistent with the Objectives, Policies and requirements of the NPS-UD and that Plan Change 12 will be effective in achieving the intended outcomes required by the NPS-UD. We also administer the Hamilton City Council Plan, alongside numerous other District Plans on a daily basis. We are uniquely positioned to provide feedback in this respect. Classic Group consider that changes to the Hamilton City District Plan to provide for medium density residential development should be based on sound planning policy which will increase housing capacity, whilst also avoiding unnecessary and inefficient process and uncertainty. Classic Group's view is that incorporating clear, certain and efficient Plan provisions is a fundamental part of the sustainable and efficient growth of the City, and in giving effect to the NPS-UD.

Suggested amendments and changes to provisions are required to better provide for housing needs, to avoid uncertainty, unnecessary processes, costs, and delays, as set out in the submission table below. In particular, there are some provisions that have been incorporated in PC 12 which are more restrictive than those in the current District Plan. These provisions are clearly contrary to the intent of the national policy direction and intent of the Resource Management Amendment Act 2021 and it is our view that these should therefore be removed.

Classic Group provides reasons for its submission and the changes sought to the provisions in the table below.

Decision sought

The decision Classic Group seeks from the Council is that Plan Change 12 be approved with:

(a) amendments to address Classic Group's submission.

(b) such further other relief or other consequential amendments as considered appropriate and necessary to address the concerns set out in the attached table.

Classic Group wish to be heard in support of their submission.

Classic Group would not gain an advantage in trade competition through their submission.

If others make a similar submission, Classic Group are prepared to consider presenting a joint case with them at any hearing.

The specific provisions of the proposal that the Classic Group submission relates to are as follows:

Page No	Reference	Support/Oppose	Decision Sought	*Reasons*
Chapter 4 Page 6	4.2.5.3.c Permeability and Landscaping	Oppose	~~c. On front, corner sites and through sites, landscaping planted in grass, shrubs and trees required forward of the front building line.~~ ~~i. Single residential units and duplex residential units and apartment buildings Minimum 50%~~ ~~ii. Terrace housing with a residential unit frontage width 7.5m or greater Minimum 40%~~ ~~iii. Terrace housing with a residential unit frontage width of less than 7.5m Minimum 30%~~	*It is considered that the MDRS landscaping rule would ensure an adequate and acceptable level of landscaping.*
Chapter 4 Page 7	4.2.5.3.d Permeability and Landscaping	Oppose	~~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:~~ ~~i. Detached residential unit - Two per residential unit~~ ~~ii. Duplex residential unit - Two per residential unit~~ ~~iii. Terrace housing unit - One per residential unit.~~ ~~iv. Apartment buildings - Minimum of one tree per site with an additional tree for every 200m² of site area.~~	*It is considered that the MDRS landscaping rule would ensure an adequate and acceptable level of landscaping. Requiring trees to be planted will also have ongoing maintenance implications and may result in adverse outcomes long term. For example, issues can arise from roots interfering with or destabilising foundations when trees are planted in close proximity to buildings.*

Page No	Reference	Support/Oppose	Decision Sought	*Reasons*
			~~v. All other activities~~ ~~Minimum of one tree per site with an additional tree for every 200m² of site area.~~	
Chapter 4 Page 7	4.2.5.3.e Permeability and Landscaping	Oppose	~~Specimen trees shall be planted as per 4.2.5.3d at a planted size of at least 80L.~~	*It is considered that the MDRS landscaping rule would ensure an adequate and acceptable level of landscaping. Requiring trees to be planted will have also ongoing maintenance implications and may result in adverse outcomes long term.*
Chapter 4 Page 11	4.2.5.6.b Building setbacks	Oppose	~~Where a garage is provided and the garage door or carport facing towards a transport corridor shall be set back from the transport corridor boundary - 5m~~	*The MDRS provisions contain setback requirements and these are accepted. The need for separate setback requirements is not supported by MDRS provisions, is inconsistent with the NPS-UD and is unnecessarily restrictive.*
Chapter 4 Page 13	4.2.5.8a Public interface	Oppose in part	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.	*The MDRS provisions do not restrict the glazing type by way of needing to be clear, or ground level only. The need for further restrictions is therefore not considered to be aligned with the national policy direction which guided the MDRS provisions.*

Page No	Reference	Support/Oppose	Decision Sought	*Reasons*
Chapter 4 Page 13	4.2.5.b Public interface	Oppose in part	Public Interface for four or more residential units on a site b. 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 for m of ~~clear-~~glazed windows or doors. ii. ~~At least one habitable room of the residential unit shall ha ve a clear-glazed window facing the transport corridor from which vision toward the transport corridor is not blocked by any accessory building~~. ~~iii. For corner and through sites this shall be required only on the frontage from which pedestrian access is provided (front door).~~	*The MDRS provisions do not restrict the glazing type by way of needing to be clear, or ground level only. The need for further restrictions is therefore not considered to be aligned with the national policy direction which guided the MDRS provisions.* *ii. Not required if complying with i.* *Inconsistent with other councils, all street facing facades need to comply with the 20% glazing requirement.*
Chapter 4 Page 16	4.2.5.11 Waste Management	Oppose in part	All residential units i. ~~5m²~~ 1.5m2 per residential unit. ~~ii. Minimum dimension 1.5m~~	*5m2 is too large an area to set aside for waste management.* *3 x 240l bins (585mm wide x 660m depth) would require a space of 1.7m x 660mm – which is 1.12m2 so it is suggested that 1.5m2 would be sufficient.* *The NPS-UD seeks to maximise efficient use of residential zoned land and therefore onsite requirements such as this should be the minimum.*

Page No	Reference	Support/Oppose	Decision Sought	*Reasons*
	4.2.5.13 Accessory Buildings, Vehicle Access and Vehicle Parking	Oppose	~~a. Any accessory building either attached or detached must be setback at least 1m from the front building line of the residential unit.~~ ~~b. Where the residential unit has a frontage width facing a street or a publicly accessible on-site access way (for pedestrians) equal to or greater than 12m: two single-width or one double-width garage or car port spaces, and one driveway / parking pad up to 6m wide, maximum can be provided.~~ ~~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.~~ ~~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.~~ ~~e. For any duplex and/or terrace housing development cont~~	*National policy direction is clear that enabling residential development and removing impediments and unnecessary restrictions to such is a priority. It is considered that these provisions are restrictive and in opposition to the MDRS and national policy direction. The MDRS glazing provision will suitably contribute to passive surveillance and these rules will create unnecessary and onerous restrictions to residential development.*

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			~~aining no more that 6 residential 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:~~ ~~i. It must be an unenclosed parking pad and shall not be enclosed into a carport or garage at any time. Any relating subdivision consent shall record this on the record of title as a consent notice,~~ ~~ii. Access to the parking pads shall be restricted to~~ ~~iii. 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 4.2.5.3 and the boundary fencing and wall standards in Rule 4.2.5.7, and~~ ~~vi. Each residential unit must have at least one habitable room with clear glazed window facing the local road.~~ ~~f. Where an on-site vehicle parking area includes more~~	

Page No	Reference	Support/Oppose	Decision Sought	*Reasons*
			~~than 4 parking spaces.~~ ~~i. The parking area shall be landscaped at the rate of 1 tree per 5 parking spaces, planted within or immediately adjacent to the parking spaces.~~ ~~4.2.5.13 f takes preference over the requirements in Rule 25.5.4.6 Internal planting.~~	
Chapter 4 Page 19	4.2.5.15 Universal Access	Oppose	~~For applications including 10 or more residential units~~ ~~a. At least 10% of residential units on a site shall be designed to provide convenient wheelchair access including.~~ ~~i. Access from a street to an entry door (which may be a front, back or side door) using gradients no greater than 1:20 and has a level (stepless) transition from inside to outside.~~ ~~ii. Doorways that are at least 810mm (door leaf 860 mm) wide to fit a wheelchair~~ ~~iii. At least one bedroom and accessible bathroom be located at ground level and on the same level as the kitchen and living room.~~ ~~Note: Where the assessment of the number of accessible units results in a fractional number, any fraction under one-half shall be disregarded and fractions of one-half or greater~~	*This would add significant cost to development and would not guarantee the accessible units are built in the areas that they are best suited to – e.g. near transport links.* *Classic Group are already involved in building accessible houses for clients in specified locations, that are purposefully designed and located with accessibility considerations at the forefront of design.*

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			~~shall be considered as one residential unit.~~	
Chapter 4.3 Page 13	4.2.5.3.c Permeability and Landscaping	Oppose	~~On front, corner sites and through sites, landscaping planted in grass, shrubs and trees required forward of the front building line except sites within the Rotokauri North Residential Precinct).~~ ~~i. Single residential units and duplex residential units and apartment buildings Minimum 50%~~ ~~ii. Terrace housing with a residential unit frontage width 7.5m or greater Minimum 40%~~ iii) ~~Terrace housing with a residential unit frontage width of less than 7.5m Minimum 30%~~	*It is considered that the MDRS landscaping rule would ensure an adequate and acceptable level of landscaping. Requiring trees to be planted will also have ongoing maintenance implications and may result in adverse outcomes long term. For example, issues can arise from roots interfering with or destabilising foundations when trees are planted in close proximity to buildings.*
Chapter 4.3 Page 13	4.2.5.3.d Permeability and Landscaping	Oppose	~~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:~~ ~~i. Detached residential unit - Two per residential unit~~ ~~ii. Duplex residential unit - Two per residential unit~~ ~~iii. Terrace housing unit - One per residential unit.~~ ~~iv. Apartment buildings - Minimum of one tree per site with an additional~~	*The "NPS on Urban Development" and "Enabling Housing Supply and Other Matter Amendment Act" are trying to give Council's the tools to remove overly restrictive and often obstructive barriers that have become commonplace within the realm of resource consent planning.*

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			~~tree for every 150m² of site area.~~ v. ~~All other activities –~~ ~~Minimum of one tree per site with an additional tree for every 200m² of site area.~~	
Chapter 4.3 Page 13	4.2.5.3.e Permeability and Landscaping	Oppose	~~Specimen trees shall be planted as per 4.3.4.3.d at a planted size of at least 80L.~~	*It is considered that the MDRS landscaping rule would ensure an adequate and acceptable level of landscaping. Requiring trees to be planted will also have ongoing maintenance implications and may result in adverse outcomes long term.*
Chapter 4.3 Page 21	4.3.4.8 Public Interface	Oppose in part	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.	*The MDRS provisions do not restrict the glazing type by way of needing to be clear, or ground level only. The need for further restrictions is therefore not considered to be aligned with the national policy direction which guided the MDRS provisions.*
		Oppose in part	Public Interface for four or more residential units on a site b. Where a residential unit is facing the street it must have: i. A minimum 20% of the street-facing façade a~~t ground level~~ in glazing. This can be in the form of ~~clear~~ glazed windows or doors.	*The MDRS provisions do not restrict the glazing type by way of needing to be clear, or ground level only. The need for further restrictions is not supported by MDRS provisions.*

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			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~~. ~~iii. For corner and through sites this shall be required only on the frontage from which pedestrian access is provided (front door).~~	*ii. Not required if complying with i.* *Inconsistent with other councils, all street facing facades need to comply with the 20% glazing requirement.*
Chapter 4.3 Page 24	4.3.4.11 Waste Management and Service Area	Oppose in part	All residential units i. ~~5m²~~ 1.5m2 per residential unit. ~~Minimum dimension 1.5m~~	*5m2 is too large an area to set aside for waste management.* *3 x 240l bins (585mm wide x 660m depth) would require a space of 1.7m x 660mm – which is 1.12m2 so in our opinion 1.5m2 would be sufficient.* *The NPS-UD seeks to maximise efficient use of residential zoned land and therefore onsite requirements such as this should be the minimum.*
Chapter 4.3 Page 26	4.3.4.13 Accessory Buildings, Vehicle Access and Vehicle Parking	Oppose	~~a. Any accessory building either attached or detached must be setback at least 1m from the front building line of the residential unit.~~ ~~b. Where the residential unit has a frontage width facing a~~	*National policy direction is clear that enabling residential development and removing impediments and unnecessary restrictions to such is a priority. It is considered that these provisions are*

Page No	Reference	Support/Oppose	Decision Sought	*Reasons*
			~~street or a publicly accessible on-site access way (for pedestrians) equal to or greater than 12m: two single-width or one double-width garage or car port spaces, and one driveway / parking pad up to 6m wide, maximum can be provided.~~ ~~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.~~ ~~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.~~ ~~e. For any duplex and/or terrace housing development containing no more that 6 residential 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~~	*restrictive and in opposition to the MDRS and national policy direction. The MDRS glazing provision will suitably contribute to passive surveillance and these rules will create unnecessary and onerous restrictions to residential development.*

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			~~no less than 5.5m deep for each residential unit where the following are met:~~ ~~i. It must be an unenclosed parking pad and shall not be enclosed into a carport or garage at any time. Any relating subdivision consent shall record this on the record of title as a consent notice,~~ ~~ii. 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,~~ ~~iii. The development must comply with the require ments for permeable surface standards in Rule 4.2.5.3 and the boundary fencing and wall s tandards in Rule 4.2.5.7, and~~ ~~vii. Each residential unit must have at least one habit able room with clear glazed window facing the local road.~~ ~~f. Where an on-site vehicle parking area includes more than 4 parking spaces.~~ ~~i. The parking area shall be landscaped at the rate of 1 tree per 5 parking spaces, planted within or immediately adjacent to the parking spaces.~~	

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			~~4.2.5.13 f takes preference over the requirements in Rule 25.5.4.6 Internal planting.~~	
Chapter 4.3 Page 28	4.3.5.15 Universal Access	Oppose	~~For applications including 10 or more residential units~~ ~~a. At least 10% of residential units on a site shall be designed to provide convenient wheelchair access including.~~ ~~i. Access from a street to an entry door (which may be a front, back or side door) using gradients no greater than 1:20 and has a level (stepless) transition from inside to outside.~~ ~~ii. Doorways that are at least 810mm (door leaf 860 mm) wide to fit a wheelchair~~ ~~iii. At least one bedroom and accessible bathroom be located at ground level and on the same level as the kitchen and living room.~~ ~~Note: Where the assessment of the number of accessible units results in a fractional number, any fraction under one-half shall be disregarded and fractions of one-half or greater shall be considered as one residential unit.~~	*This would add significant cost to development and would not guarantee the accessible units are built in the areas that they are best suited to – e.g. near transport links.* *Classic Group are already involved in building accessible houses for clients in specified locations, that are purposefully designed and located with accessibility considerations at the forefront of design*

Page No	Reference	Support/Oppose	Decision Sought	*Reasons*
Chapter 4 Page 6	4.4.5.3.c Permeability Surface and Landscaping	Oppose	~~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:~~ ~~i. Terraces and/or Apartments – Minimum of one tree per site with an additional tree for every 150m2 of site area~~ ii. ~~All other activities - Minimum of one tree per site with an additional tree for every 200m² of site area.~~	*It is considered that the MDRS landscaping rule would ensure an adequate and acceptable level of landscaping. Requiring trees to be planted will have also ongoing maintenance implications and may result in adverse outcomes long term. For example, issues can arise from roots interfering with or destabilising foundations when trees are planted in close proximity to buildings.*
Chapter 4.4 Page 12	4.3.4.8 Public Interface	Oppose in part	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~~	*The MDRS provisions do not restrict the glazing type by way of needing to be clear, or ground level only. The need for further restrictions is not supported by MDRS provisions.* *The need for further restrictions is not supported by MDRS provisions.* *ii. Not required if complying with i.* *Inconsistent with other councils, all street facing facades need to comply with the 20% glazing requirement.*

Page No	Reference	Support/Oppose	Decision Sought	*Reasons*
			~~access is provided (front door).~~	
Chapter 4.4 Page 15	4.4.5.11 Waste Management and Service Area	Oppose in part	All residential units i. ~~5m²~~ 1.5m2 per residential unit. ii. ~~Minimum dimension 1.5m~~ iv. Spaces can be provided for each individual unit or cumulatively on a communal basis	*5m2 is too large an area to set aside for waste management.* *3 x 240l bins (585mm wide x 660m depth) would require a space of 1.7m x 660mm – which is 1.12m2 so in our opinion 1.5m2 would be sufficient.* *The NPS-UD seeks to maximise efficient use of residential zoned land and therefore onsite requirements such as this should be the minimum.*
Chapter 4.4 Page 23	4.4.5.13 Accessory Buildings, Vehicle Access and Vehicle Parking	Oppose	~~a. Any accessory building either attached or detached must be setback at least 1m from the front building line of the residential unit.~~ ~~b. Where the residential unit has a frontage width facing a street or a publicly accessible on-site access way (for pedestrians) equal to or greater than 12m:~~ ~~i. two single-width or one double-width garage or~~	*National policy direction is clear that enabling residential development and removing impediments and unnecessary restrictions to such is a priority. It is considered that these provisions are restrictive and in opposition to the MDRS and national policy direction. The MDRS glazing provision will suitably contribute to passive surveillance and these rules will*

Page No	Reference	Support/Oppose	Decision Sought	*Reasons*
			~~car port spaces, and one driveway / parking pad up to 6m wide, maximum can be provided.~~ ~~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:~~ ~~i. one single-width garage or car port space, and one driveway / parking pad up to 3.5m wide.~~ ~~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:~~ ~~i. It must be an unenclosed parking pad and shall not be enclosed into a carport or garage at any time.~~ ~~ii. 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,~~ ~~iii. 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,~~	*create unnecessary and onerous restrictions to residential development.*

Page No	Reference	Support/Oppose	Decision Sought	*Reasons*
			~~and~~ ~~iv. 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~~ ~~e. 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:~~ ~~i. no garage or car port spaces within the dwelling's frontage is permitted and any vehicle access and garaging is to be provided by a rear lane.~~ ~~f. Where an on-site vehicle parking area includes more than 4 parking spaces, the parking area shall be~~ ~~i. Landscaped at the rate of 1 tree per 5 spaces, planted within or immediately adjacent to the parking spaces. Rule 4.4.5.13 f takes preference over the requirements in Rule 25.5.4.6 Internal planting.~~	
Chapter 4.4 Page 18	4.4.5.15 Universal Access	Oppose	~~a. At least 10% of residential units on a site shall be designed to provide convenient wheelchair access including.~~ ~~i. Access from a street to an entry door (which may be a front, back or side door) using~~	*This would add significant cost to development and would not guarantee the accessible units are built in the areas that they are best suited to – e.g. near transport links.*

Page No	Reference	Support/Oppose	Decision Sought	*Reasons*
			~~gradients no greater than 1:20 and has a level (stepless) transition from inside to outside.~~ ~~ii. Doorways that are at least 810mm (door leaf 860 mm) wide to fit a wheelchair~~ ~~iii. At least one bedroom and accessible bathroom be located at ground level and on the same level as the kitchen and living room.~~ ~~Note: Where the assessment of the number of accessible units results in a fractional number, any fraction under one-half shall be disregarded and fractions of one-half or greater shall be considered as one residential unit.~~	*Classic Group are already involved in building accessible houses for clients in specified locations, that are purposefully designed and located with accessibility considerations at the forefront of design.*
Chapter 23 Page 22	23.7.1 Allotment size and shape	Oppose	~~a. Vacant lot General Residential Zone (unless otherwise stated) 400m 300m2-15m-diameter circle~~ b. ~~General Vacant Lot - Medium Density Residential Zone (within(Except within the Rotokauri Rototuna Structure Plan Area North Residential Precinct then Rule 23.7.1 q. applies)) 400m 1200m2-15m-diameter circle~~ ~~c. Vacant Lot High Density Residential Intensification Zone 350m1200m2--Contain a rectangle of 15 metres by 20 metres~~	*Remove the minimum lot size requirement and reliance be placed on the land use riles to ensure suitable development outcomes.*

Page No	Reference	Support/Oppose	Decision Sought	*Reasons*
Chapter 24 Page 3	24.4.2.a.i. Residential Development	Oppose	B. These costs will include: • Where an existing supply is available, the cost of connection with the existing system; • ~~Where an existing supply is available, but the age and state of the network makes it unsuitable to meet the additional generated demand, the cost of connection and renewal of the existing system.~~	*Unfair and potentially economically unviable to put the full cost on to those developing the sites, when others have also contributed to the state of the network.*
Chapter 24 Page 3	24.4.2.a.ii Residential Development	Oppose	~~B. These costs will include:~~ • ~~Where public open spaces can be improved, the cost of land acquisition and development; and~~ • ~~Where streetscape amenity can be enhanced, the~~ • ~~cost of that enhancement.~~	*Unfair and potential economically unviable to put the full cost on to those developing the sites, when others in the community will benefit from the development.*
Transportation Page 27	25.14.4.2b	Oppose	~~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 provided.~~ ~~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.~~	*Should be encouraged but not mandatory. Define electric vehicle charging point, is it a standard electrical socket to plug a charger into, or is a installed wall charger?* *If it is a wall charger, it could cause unnecessary installation in homes that will never have an electric vehicle and a shortage of units for those who need to install them.* *Increased cost of the dwelling.* *Has power infrastructure capacity been considered alongside this proposed rule.*

If you have any questions in regards the above submission, please do not hesitate to contact Libby Gosling, Urban Design Manager, contact details as below.

Electronic address for service of submitter	libby.gosling@classicdevelopments.co.nz
Telephone	0211938341
Postal address	160 Seventeenth Avenue Tauranga South Tauranga 3112

Yours sincerely

Peter Cooney
Director, Classic Group