
BEFORE THE HEARINGS PANEL

In the Matter of: The Resource Management Act 1991

And Proposed Plan Change PC39:
Residential Building Coverage

Application By: Taupō District Council

Section 42A of the RMA Report By

ROWAN SAPSFORD

Dated: 3 July 2023



Taupō District Plan

CHANGES - BUNDLE ONE

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1 Preamble

- 1) This report is prepared under s42A of the Resource Management Act 1991. It has been prepared at the request of Taupō District Council (TDC) in relation to Plan Change 39 – Residential Building Coverage (PC39).
- 2) My full name is Michael Rowan Sapsford. I am a Director of ROAM Consulting in Taupō. I have held this position since 2018.
- 3) I hold a Bachelor of Resource and Environmental Planning (Massey University 1998) and a Post Graduate Diploma in Rural Studies - Natural Resource Management (Massey University 1998). I have been employed in the practice of planning and resource management both in Aotearoa New Zealand and overseas for some 25 years. This experience includes working as a Senior Planner and Team Leader Environmental Policy at Taupō District Council from 2004 to 2011.
- 4) I was commissioned by TDC to develop this Section 42A report for Plan Change 39 Residential Coverage. While I have been involved in the wider plan changes that form this tranche of the sectional review of the Taupō District Plan (TDP) I have had no earlier involvement in PC39.
- 5) I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2023, and agree to comply with it. My qualifications as an expert are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted consideration of material facts known to me that might alter or detract from the opinions that I express.
- 6) Terms and abbreviations used in the evidence include:
 - **TDP / District Plan** – Operative Taupō District Plan
 - **Overarching s42a** – Overarching s42a report prepared by Hilary Samuel
 - **PC39** – Plan Change 39 Residential Coverage
 - **PC39 S32** - District Plan Change 39 Maximum Building Coverage – Residential Environment and Nukuhau General Residential Section 32 Evaluation Report
 - **TDC** – Taupō District Council
 - **RMA or the Act** – The Resource Management Act 1991
 - **WRPS** – Waikato Regional Policy Statement
 - **WRPS PC1** – Plan Change 1 to the Waikato Regional Policy Statement
- 7) The purpose of this s42A Report is to recommend to the Hearings Panel whether PC39 as notified, or amended by submissions, will better meet the purpose of the Resource Management Act 1991 compared to the existing provisions.

2 Introduction

- 8) PC39 has been prepared and notified on 14 October 2022 in accordance with s74 of the RMA, and the first part of Schedule 1, which outlines the requirements for changing a District Plan. It is part of the Taupō District Council Sectional District Plan Review.
- 9) For additional background refer to the Overarching s42a Report prepared by Hilary Samuel that covers the timeline for preparing this plan change, engagement and additional legislative context.
- 10) The current District Plan became fully operative in 2007. The Council is required to commence a review of those provisions in the District Plan that have not been reviewed in the last 10 years, pursuant to s79 of the RMA.
- 11) Proposed Plan Change 39 to the Taupō District Plan seeks to increase the percentage of maximum building coverage in the Residential Environment and Nukuhau General Residential, from 30% to 35%. The table below identifies what parts of the Residential Environments are included and excluded from this Plan Change.

Figure 1 Plan Change 39 Scope

RESIDENTIAL ENVIRONMENT	INCLUDED IN THIS PLAN CHANGE
All properties in the district zoned Residential Environment (See the district plan map for more information).	✓
Nukuhau General Residential	✓
Kinloch Residential, Kinloch Low Density and Kinloch Rural Residential	✗
Low Density Residential	✗
High Density Residential	✗
Nukuhau Medium Density Residential	✗
Lake Ohakuri Development Zone	✗
Pukawa C Development Zone	✗
Neighbourhood shops	✗
Properties with site specific coverage requirements (i.e through consent notices)	✗

- 12) Building Coverage is defined in Section 10 of the TDP as:

“The portion of the allotment covered by building.”

- 13) As shown in the PC39 S32 resource consent is generally granted (bearing in mind that there will be a range of unique factors associated with each application) for applications for buildings slightly over coverage. On this basis it is considered that this process is creating unnecessary additional costs and adding time to the development process.
- 14) The background and rationale for PC39 is set out in the PC39 s32 Report. The following is a summary of key points from the s32 Report that I consider to be relevant to the matters raised in submissions.
- 15) In preparing PC39 TDC staff undertook the following analysis:
 - resource consents from 2014-2018 and 2021 that were for infringements of the building coverage rule;
 - assessed TDC building coverage standards against other district plans of similar size, and made comparison calculations on lot sizes to understand how 35% coverage would affect different property sizes.
- 16) The assessment of resource consents showed that between 1 January 2014 and 1 October 2018 there was a total of 440 land use consents granted, 178 (40%) of these land use consents included non-compliances to exceed maximum building coverage of 30% (Figure 2). The majority of the land use consents sought and approved were for between 30% and 36% building coverage. The data from 2021 is similar to the 2014-2018 data (Figure 3), however the most common exceedance sought increased from 32% - 33% to 34% - 35%.

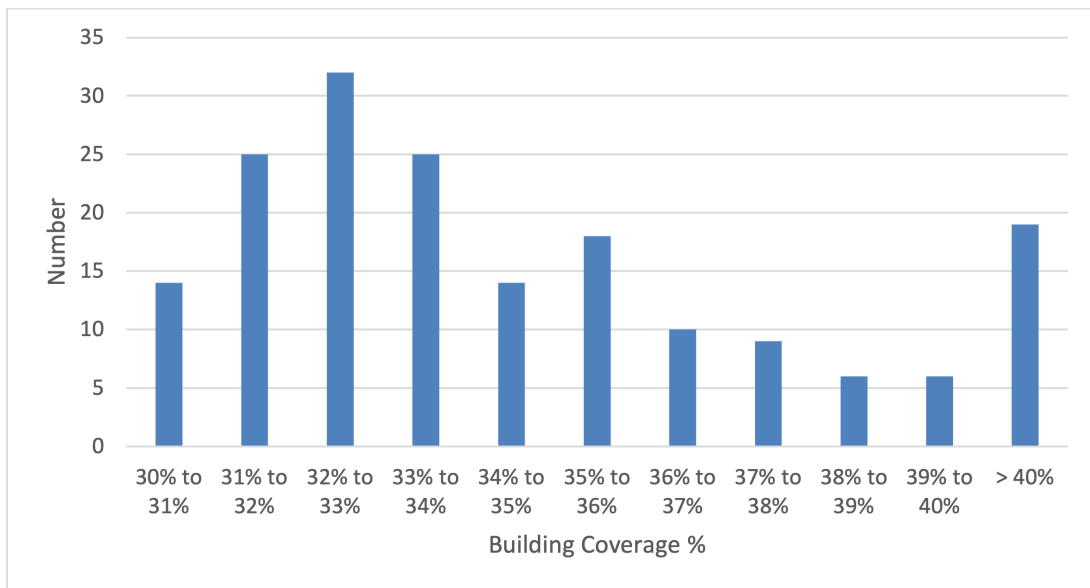


Figure 2 - 2014-2018 resource consents for building coverage non-compliance

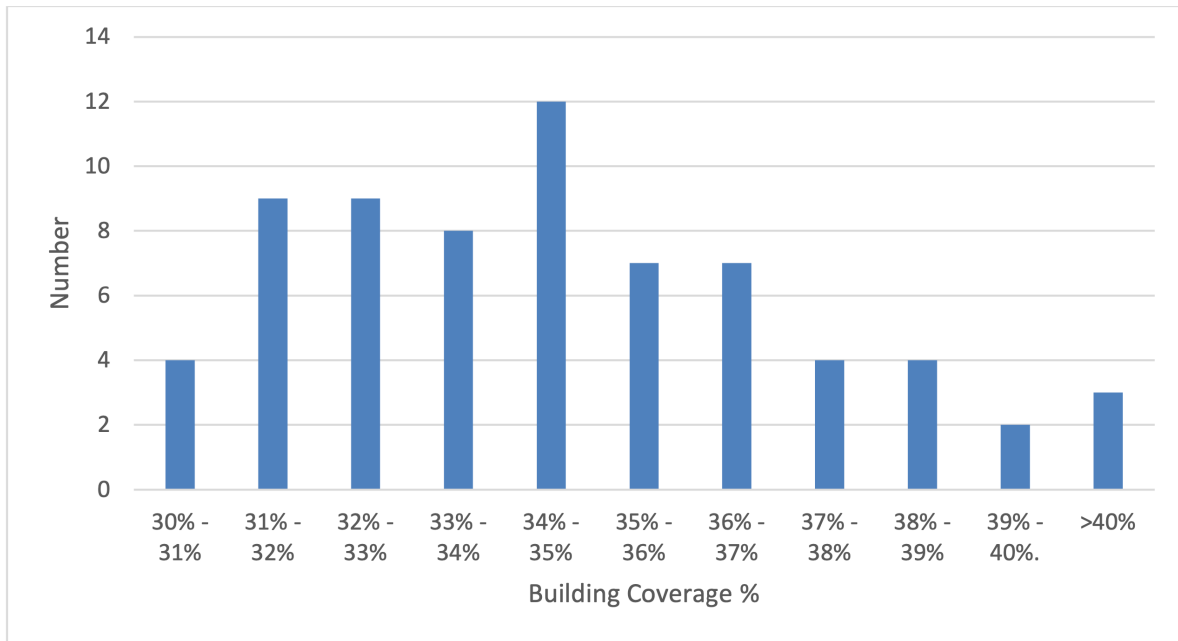


Figure 3 - 2021 resource consents for building coverage non-compliance

- 17) When considering comparable district plans it was identified by TDC officers that three of the four District Plans assessed provide a permitted coverage of 40% which provides, as an example, for a dwelling of 160m² on a 400m² allotment. The 30% building coverage provided for in the TDP allows a building of up to 120m², being 40m² less than those building permitted in these other Districts. At 35% as provided for in the Matamata-Piako District Plan, buildings are 20m² larger than those permitted under the TDP.
- 18) A key difference with the TDP is that there is no minimum density or allotment size in the Residential Environments. The TDP operates on the basis that any size allotment is allowable, however compliance with the performance standards needs to be demonstrated. For example, a 200m² site, would have a permitted building footprint of 60m² unless resource consent was obtained for additional coverage. Therefore the bigger the site the larger building able to be provided as a permitted activity.
- 19) On the basis of TDC officers assessment, it was concluded that the 5% increase will not provide for a substantial amount of change in terms of building size relative to the size of the site, but enough change to allow landowners the ability to create space they require without additional costs and delays incurred through the resource consent process.
- 20) Applications received seeking building coverages greater than 35% will still be assessed through the resource consent process. It is however, reasonable to expect that there will be more applications seeking greater coverages. The effects of such applications will be considered against the character and functioning of the location where they are proposed to be developed.

- 21) Council recognises that the bulk and location standards are in need of a comprehensive review, they will be dealt with in the wider Residential Environment plan change which is continuing to be developed. This is due to the complexity of the work required to draft appropriate amendments.
- 22) In the meantime PC39 was notified with the intent of delivering positive outcomes earlier than what is being considered through the more complex wider Residential Environment plan change.
- 23) This report analyses and responds to submissions received on those provisions proposed in PC39.

2.1 Structure of this S42A Report

- 24) For efficiency and in accordance with Clause 10(3) of the First Schedule of the RMA, the following evaluation has been undertaken on an issues based approach, as opposed to a submission by submission approach. This analysis is provided for each component of PC39.
- 25) The evaluations provided should be read in conjunction with the summaries of submissions and the submissions themselves.

3 Statutory Considerations

- 26) Before a plan change request can be incorporated into a District Plan it must fulfil a number of statutory requirements set down in the RMA, including:
 - a) Part II, comprising Section 5, Purpose and Principles of the Act; Section 6, Matters of National Importance; Section 7, Other Matters; and Section 8, Treaty of Waitangi;
 - b) Section 31, Functions of Territorial Authorities;
 - c) Section 32, Duty to consider alternatives, assess benefits and costs;
 - d) Section 74, Matters to be considered by territorial authorities; and
 - e) Section 75, Contents of district plans.
- 27) The statutory requirements under the RMA for each aspect of the Plan Change have been summarised in the s32 Report, and so only be referenced here. Analysis of the degree to which PC39 is consistent with the relevant provisions listed above is undertaken within the body of the report and in the concluding statements as considered necessary.
- 28) The purpose of this assessment is to determine whether the provisions of PC39 should be confirmed, amended or deleted, after consideration of the alternative provisions sought in submissions.

3.1.1 Section 32AA Matters

- 29) This report uses 'key issues' to group, consider and provide reasons for the recommended decisions on similar matters raised in submissions. An evaluation is required under s32AA of the RMA for any recommended changes to the Plan Change.

- 30) The s32AA further evaluation for each key issue considers:
- Whether the amended objectives are the best way to achieve the purpose of the RMA.
 - The reasonably practicable options for achieving those objectives.
 - The environmental, social, economic and cultural benefits and costs of the amended provisions.
 - The efficiency and effectiveness of the provisions for achieving the objectives.
 - The risk of acting or not acting where there is uncertain or insufficient information about the provisions.
- 31) The s32AA further evaluation contains a level of detail that corresponds to the scale and significance of the anticipated effects of the changes that have been made. Recommendations on editorial, minor and consequential changes that improve the effectiveness of provisions without changing the policy approach are not re-evaluated.
- ### 3.1.2 Procedural Matters
- 32) No site visits or pre-hearing meetings were considered necessary in respect to PC39.
- 33) Due to the clarity of submissions, no other correspondence or formal pre- hearing meetings with submitters needed to be undertaken.

4 Consideration of Submissions Received

4.1 Overview of Submissions Received

- 34) PC39 was notified on 14 October 2022 for a period of 40 working days. PC39 was notified as part of a series of plan changes (Plan Changes 38 – 43) to the TDP as part of the sectional review of the Plan. 19 submissions were made on PC39 which were summarised into 26 submission points. 13 submission points oppose or seek amendment and 13 support the plan change. No further submissions were received on PC39.
- 35) Submissions were received from iwi, individuals, interest groups, developers and local and central government. A full list of submissions and further submissions on PC39 is contained in Appendix 1 – Submissions. Appendix 1 also contains recommendation for each submission. Appendix 2 – Recommended Amendments sets out the recommended changes to PC39 as a result of submissions.
- 36) On review of the submissions received the key issues raised are:
- Issue 1: A need to review lot sizes
 - Issue 2: Retention of green spaces and impermeable surfaces
 - Issue 3: Further increase in building coverage
 - Issue 4: Recognition of regional and national planning documents

- Issue 5: Recognition of Te Kaupapa Kaitiaki and Te Tiriti

37) These matters are assessed in the following sections of this report. And based on that assessment no changes to PC39 are recommended.

4.1.1 Submissions in Support

38) Half of the submission points received were in support of the provisions that form PC39. In all cases the support of these submissions is noted and as there are no changes recommended to PC39, they are accepted in full.

4.2 Issue 1: Lot Sizes

39) Melvin Dinn (OS2.1, OS2.2 and OS2.3) is seeking provision for subdivision based on specific lot sizes to increase council revenue and affordable housing.

40) The scope of this plan change is restricted to building coverage only. The development of lot size based subdivision rules in the Residential Environment is out of scope of PC39.

41) As noted in paragraph 18) except for the Kinloch Structure Plan Area and the Lake Ohakuri Development Zone, the TDP does not use minimum lot size rules in the Residential Environment. The TDP operates on the basis that any size allotment is allowable within the Residential Environment, however compliance with the performance standards needs to be demonstrated. For example, a 500m² site, would have a permitted building coverage, under PC39, of 175m² unless resource consent was obtained for additional coverage. Therefore the bigger the site the larger building able to be provided as a permitted activity.

42) The scenarios set out in the submission are therefore not precluded by the TDP and the matters raised by the submission are already provided for by the TDP.

4.3 Issue 2: Retention of Green Spaces and Impermeable Surfaces

43) Tukairangi Trust (OS46.1), LWAG (OS101.9) and the Taupō Climate Action Group (OS114.8) have raised concerns that the proposed changes to the permitted coverage will lead to an increase in impermeable surfaces within the Residential Environment and within the Lake Taupō catchment. There is also concern that the proposed changes will lead to greater visual impacts of the built environment that may result from less green spaces within this environment.

44) PC39 is not proposing to change the Storm Water (4a.1.23) or Total Coverage (4a.1.3) standards within the TDP.

45) Performance Standard 4a.1.23 requires the onsite disposal of all stormwater from buildings and impermeable surfaces. This includes that water collected from the roofs of residential buildings.

46) Total coverage is defined in s10 of the TDP as:

“The maximum amount of the allotment permitted to be covered, regardless of the surface material, which is required in complying with the Performance Standards in relation to vehicle movements, parking and building coverage but excluding any land used for right-of-way or access lots.”

- 47) This is the key standard that controls impermeable surfaces within the Residential Environment. The standard also provides for green spaces within this environment. As these standards are not proposed to be changed it is my view that PC39 will not lead to the effects identified in the submissions.
- 48) The proposed changes to building coverage standards are over time, anticipated to result in an increase in the average building size in proportion to land area within the Residential Environment. The s32 assessment states that this change is not considered to be a substantial variation to the character of the Residential Environment. In respect to visual impacts, residential buildings are ‘anticipated’ within the Residential Environment. The visible presence of residential buildings is not considered to be an adverse effect. As such there is no requirement to reduce or hide their visual presence.
- 49) Linda Smeaton (OS48.1) raises concerns about unnecessary intensification and reduced daylighting, greenery and parking areas etc.
- 50) The focus of the plan change is not about intensification of the Residential Environment. The current standard means that there are resource consents sought for buildings over coverage. For those buildings just over the coverage standard, resource consent is generally granted. The existing standard is seen to be creating unnecessary costs and adding time to the development process.
- 51) As I have noted above, PC39 does not change the Total Coverage standards. PC39 does not also reduce the setback or height to boundary standards. Those standards will remain the same. There is also no requirement within the TDP for the provision of onsite parking. It is my view that PC39 will not lead to the adverse effects identified by the submitters

4.4 Issue 3: Further Increase in Coverage

- 52) Kainga Ora (OS104.10) is seeking an increase in the proposed coverage to 40%, 5% greater than what is proposed by PC39 and 10% greater than what is permitted. Changing the coverage to 40% would have a more noticeable effect on the character and the functioning of that environment. A change to 40% is not supported by resource consent analysis set out in the s32 and would not reflect existing building patterns within the Residential Environment as a 35% coverage does.
- 53) The Council has initiated a review of the wider Residential Environment standards as it recognises that the bulk and location standards are in need of a comprehensive review. The need to increase coverages further in parts of the Residential Environment may be considered through this more fulsome review. Any such review will be done within the context of possible changes to the entire package of residential performance standards.
- 54) The TDP does not prohibit developments with a building coverage greater than 30%. The standards act as a trigger for a resource consent application to occur. An application for consent can be made for those

developments referred to in the applicants submission. The presence of the High Density Residential Environment provides opportunities for more intensive developments with a higher permitted building coverage (50% standard).

4.5 Issue 4: Recognition of Regional and National Planning Direction

- 55) The Waikato Regional Council (OS29.22) has submitted that there is a need to give regard of Plan Change 1 to the Waikato Regional Policy Statement. WRPS PC1 introduces a revised urban form and development chapter to ensure that the policy statement is giving effect to the NPS-UD. This includes deleting provisions relating to growth strategies and updating provisions relating to the Future Proof subregion.
- 56) PC39 will enable the Residential Environment to be developed in a manner which reflects the local context. PC39 recognises that the current amenity of the Residential Environment is more aligned with the recommended coverage. PC39 reflects the changing needs of the community whilst not detracting from the functioning of that environment. On this basis it is considered that the changes PC39 is proposing to the TDP are consistent with WRPS PC1.
- 57) Waikato Regional Council (OS29.28) has submitted that the Taupō District Plan be reformatted to follow the new plan format provided within the 2019 National Planning Standards. As noted in the Overarching 42A Report, under the National Planning Standards Taupō District Council would need to ensure consistency in terms of requirements for structure and form by November 2024, with consistency with Definitions by November 2026.
- 58) Accordingly, for the purposes of these Plan Changes there is not a mandatory requirement to amend provisions in accordance with the requirements of the National Planning Standards. To do so risks unintended consequences within the architecture of the TDP outside a more fulsome or complete review.
- 59) It is intended that the entire District Plan will be moved into the National Planning Standard format as a comprehensive unit. This ensures that definitions, numbering and format remain consistent between chapters and sections. However, it should be noted that where possible, the National Planning Standards terminology (for example Strategic Directions) has been used where it fits and will not compromise the structure of the Operative Plan.
- 60) Te Kotahitanga o Ngāti Tuwharetoa are seeking (OS115.28) that PC39 reflects the wording of the National and Built Environment (NBE) and Spatial Planning (SP) Bills. As these Bills have yet to be enacted it is not appropriate to make any changes to the TDP at this stage. The TDP will need to be reviewed in the future on the basis of any new resource management legislation.

4.6 Issue 5: Recognition of Te Kaupapa Kaitiaki and Te Tiriti

- 61) Te Kotahitanga o Ngāti Tuwharetoa are seeking that the proposed plan changes recognise and provide for the vision, objectives, values, and desired outcomes in Te Kaupapa Kaitiaki (OS115.16) and reflect a genuine understanding of the principles of Te Tiriti (OS115.22).
- 62) As noted in Section 4.3, it is not anticipated that PC39 will have an impact on the Taupō catchments. While the plan change does support an increase in built coverage, the Storm Water (4a.1.23) and Total Coverage (4a.1.3) standards remain the same. Those two standards have the greatest control on stormwater being discharged from a residential site and into the wider catchment.
- 63) Iwi were engaged with during the development of PC39, with no specific feedback given. Given the scope of PC39 it is not considered that it is inconsistent with the principles of Te Tiriti nor is it necessary to amend PC39 on that basis.

4.7 Section 32AA Evaluation

- 64) As no other changes are being made to the provisions of the Proposed District Plan with these changes, no further s32AA evaluation is necessary.

5 Conclusion & Recommendation

5.1 Conclusion

- 65) In the assessment of PC39, having regard to the submissions received, I am satisfied that PC39 is the most appropriate means of sustainably managing the physical resources in the Taupō District. PC39 is consistent with the Sectional District Plan review process and the purpose and principles of the RMA.
- 66) The principal reasons for this conclusion is that a 5% increase in building coverage will not create a substantial amount of change in terms of building size relative to the size of the site, but will provide for enough change to allow landowners the ability to create the space they require without additional costs and delays incurred through the resource consent process. This change is consistent with recent development patterns within the Taupō District Residential Environments.
- 67) The changes, proposed as part of PC39, are consistent with the Council's functions under s31 of the RMA. PC39 enables a consistent planning approach to be applied in the District. The policy framework and rules are also consistent with higher level documents, such as the Regional Policy Statement (RPS), and also with the Council's TD2050 Growth Management Strategy.
- 68) PC39 is consistent with Section 75(1) of the RMA, which requires a District Plan to state the objectives for the District, any policies to implement the objectives, and the rules (if any) to implement the policies. PC39 offers a clear connection between resource management issues that have been identified, the policies to address those issues, and the rules to implement the policies.
- 69) PC39 is consistent with the wider resource management approach of the Operative District Plan and the Sectional District Plan review process.
- 70) Furthermore, I concur with the findings of the Section 32 evaluation which considered the approach to be the most efficient and effective means of achieving the purpose of the RMA as the proposed new coverage standard better achieves the purpose of the Act.
- 71) With respect to the purpose and principles of the RMA, I consider the proposed Plan Change to be consistent with section 5 of Part II of the Act.
- 72) There are no Matters of National Importance set out in s6 of the RMA relevant to this plan change.
- 73) S7 of the RMA sets out the other matters to which decision makers shall have particular regard. Of particular relevance to this report are the following:
- (a) The maintenance and enhancement of amenity values
 - (b) Maintenance and enhancement of the quality of the environment.

In both instances it is my view that PC39 is consistent with these matters in that the changes will lead to outcomes which will maintain the amenity and quality of the Residential Environment.

- 74) S8 of the RMA requires that the Principles of the Treaty of Waitangi shall be taken into account in relation to managing the use, development and protection of natural and physical resources. Tangata whenua representatives were identified as Clause 3 parties, and consulted accordingly during the draft consultation phase of the development of PC39 as well as following formal notification of the plan change.

5.2 Recommendation

- 75) Accordingly, for the reasons set out above, I recommend that PC39 be approved as notified and that the relief sought by the submitters be accepted or rejected as recommended in Appendix 1.

Rowan Sapsford

ROAM Consulting

27 June 2023

Appendix 1. Recommended Decisions on Submissions to PC39

Submission ID	Submitter Name	Position	Decision Sought	Recommendation	Section of Report
OS17.4	Jennifer Molloy-Hargraves	Support	Retain Plan Change 39 as notified.	Accept	4.1.1
OS24.1	Classic Builders Lakes District	Support	Retain proposed increased building coverage.	Accept	4.1.1
OS29.22	Waikato Regional Council	Seek amendment	Give regard to Change 1 to the WRPS as a 'proposed policy statement' in the proposed plan changes.	Accept	4.5
OS29.28	Waikato Regional Council	Seek amendment	Submitter seeks plan change 29 be updated in the new plan format within the National Planning Standards.	Not Accept	4.5
OS36.1	Peter Hill	Support	Retain proposed increase in building coverage.	Accept	4.1.1
OS38.2	Terry Palmer	Support	Retain as notified.	Accept	4.1.1
OS40.1	Tuwharetoa Settlement Trust	Support	Support the increase in building coverage from 30% to 35% for the Residential Environment.	Accept	4.1.1
OS40.2	Tuwharetoa Settlement Trust	Support	Support the provision for papakāinga development within the Taupo District.	Accept	4.1.1
OS55.1	Enterprise Great Lake Taupo trading as Amplify	Support	Retain	Accept	4.1.1
OS59.11	Ryman Healthcare Limited	Support	Retain	Accept	4.1.1
OS61.2	McKenzie & Co	Support	Retain	Accept	4.1.1

Submission ID	Submitter Name	Position	Decision Sought	Recommendation	Section of Report
OS63.5	Debs Morrison	Support	Increase permitted residential building coverage in most residential environments from 30% to 35%.	Accept	4.1.1
OS65.4	Richard Thompson	Support	Increase permitted residential building coverage in most residential environments from 30% to 35%	Accept	4.1.1
OS79.1	Cheal Consultants	Support	Retain	Accept	4.1.1
OS98.11	Retirement Villages Association of New Zealand Incorporated	Support	Retain	Accept	4.1.1
OS115.16	Te Kotahitanga o Ngāti Tuwharetoa	Seek amendment	Amend PC 39 to recognise and provide for the vision, objectives, values, and desired outcomes in Te Kaupapa Kaitiaki.	Accept in Part	4.6
OS115.22	Te Kotahitanga o Ngāti Tuwharetoa	Seek amendment	Amend Plan Changes 39 to respect and reflect a genuine understanding and commitment to the principles of Te Tiriti/The Treaty of Waitangi.	Accept in Part	4.6
OS115.28	Te Kotahitanga o Ngāti Tuwharetoa	Seek amendment	That TDC ensure that the content and interpretation of the objectives and policies of Plan Change 39 reflects the new wording of the NBE and SP Acts once these are ratified by the appropriate regional authorities.	Accept in Part	4.5
OS2.1	Melvin Dinn	Seek amendment	Submitter requests all sections over 600- 999 sq. m sqm be allowed to be subdivided into two.	Not Accept, Out of scope	4.2
OS2.2	Melvin Dinn	Seek amendment	Submitter requests all sections over 1000 sqm - 1500 sq. m to be subdivided into 3 and sec on over 2000 sq. m to be divided into 4- 5 subsections.	Not Accept, Out of scope	4.2
OS2.3	Melvin Dinn	Seek amendment	Sections in the outer suburbs are too big such as Kinloch and Acacia Bay area. Any section over 3000 sqm can be subdivided into 4 plus sections.	Not Accept, Out of scope	4.2

Submission ID	Submitter Name	Position	Decision Sought	Recommendation	Section of Report
OS46.1	Tukairangi Trust	Seek amendment	That if the council approves an increase in the building coverage maximum for new (and I guess this means established sections in the applicable area) it must set up a measurable target, and meet it, for the planting of large trees and - where size is impractical - gardens on road verges, median strips and parks and reserves.	Not Accept	4.3
OS48.1	Linda Smeaton	Oppose	I would like the current site coverage to be retained or reduced.	Not Accept	4.3
OS101.9	LWAG	Seek amendment	LWAG therefore seek amending wording of the total coverage rule to have a limit on impermeable surfaces. We ask that a minimum of 10% of vegetation be retained per site	Not Accept	4.3
OS104.10	Kainga Ora	Seek amendment	The submitters seek amendments to Maximum building coverage as follows: 35% 40%	Not Accept	4.4
OS114.8	Taupō Climate Action Group	Seek amendment	Submitter seeks that solutions such as permeable driveways are promoted, and that the maximum site coverage of 50% is made enforceable by changing the wording of the maximum building coverage rule to restrict the amount of non-permeable surfacing.	Not Accept	4.3

Appendix 2. Recommended Amendments to PC39

No amendments are recommended because of submissions made on PC39.