

BEFORE THE INDEPENDENT HEARINGS PANEL

UNDER

the Resource Management Act 1991
and the Canterbury Earthquake
(Christchurch Replacement District
Plan) Order 2014

IN THE MATTER OF

**THE PROPOSED CHRISTCHURCH
REPLACEMENT DISTRICT PLAN
STAGE 2**

SUBMITTER

**CARTER GROUP LIMITED
(SUBMITTER 2330)**

**MEMORANDUM OF COUNSEL WITH RESPECT TO LATE FURTHER
SUBMISSION BY R J AND P F MCGUIGAN ON PROPOSAL 8: STAGE
2**

Dated: 28 August 2015

GREENWOOD ROCHE CHISNALL
LAWYERS
CHRISTCHURCH
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Submitter's Solicitor
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MAY IT PLEASE THE PANEL:

- 1 This Memorandum is filed on behalf of Carter Group Limited (CGL) (Submitter 2330) in response to the Panel's Minute dated 25 August 2015.
- 2 CGL advises that it was not served with a copy of the Further Submission of Mr and Mrs McGuigan at the time such document was lodged with the Council on 13 July 2015. The further submission was, however, provided to Greenwood Roche Chisnall (as the address for service for CGL) by the Christchurch City Council on 25 August 2015 and was further served on CGL directly by Mr and Mrs McGuigan on 27 August 2015.
- 3 CGL does not consider that its interests would be prejudiced or adversely affected by the granting of leave to Mr and Mrs McGuigan to file a late submission. CGL does, however, query whether the relief sought by Mr and Mrs McGuigan is within the scope of the original submission.
- 4 The CGL submission is attached as Appendix 1 for ease of reference.
- 5 It is noted that with respect to **Rule 8.8.7**, the CGL submission specifically supports the retention of the provisions as notified. It seeks no amendment. The further submission of Mr and Mrs McGuigan appears to seek the inclusion of visual and environmental effects within the nuisance provisions in Rule 8.8.7(1)(a)-(f)¹.
- 6 By virtue of the further submission on Rule 8.8.5 as set out below the McGuigans also seek the addition of a new provision 8.8.7(1)(g) which provides for the exemption in Rule 8.8.5(6) for "*Any earthworks involving the establishment, repair or replacement of any permitted, established or consented utilities or the maintenance of existing drains or ponds, including within road reserves*" to be instead included as a matter of discretion within this Rule 8.8.7.
- 7 With respect to **Rule 8.8.5** the CGL submission supports the retention of the rule as notified with no amendment. The McGuigan

¹ Please note there is a numbering problem with this provision – rule 8.8.7(1) has only the heading "nuisance" but it is expected that the provisions under 8.8.7(2) are intended to sit under this provision

submission instead seeks the removal of the exemption in rule 8.8.5(6): *"Any earthworks involving the establishment, repair or replacement of any permitted, established or consented utilities or the maintenance of existing drains or ponds, including within road reserves"*.

DATED this 28th day of August 2015



L J Semple

Counsel for Carter Group Limited

SUBMISSION ON CHRISTCHURCH REPLACEMENT DISTRICT PLAN (STAGE 2)

1. Christchurch City Council

Strategy and Planning
PO Box 73012
Christchurch 8154
Via Email dpreview@ccc.govt.nz

2. Submitter Details: Carter Group Limited (CGL)

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3. Trade Competition

- 3.1 The submitter could not gain an advantage in trade competition through this submission

4. Stage 1 Submitters

- 4.1 The submitter did make a submission in Stage 1 in respect of other matters. This submission relates to new matters within the scope of Stage 2 only. Note 4 does not apply.

5. Hearing

- 5.1 The submitter does wish to be heard. The submitter will consider presenting a joint case with other submitters at hearing.

6. The Submission

Background

- 6.1 CGL is an experienced property owner, investor and developer with significant property interests throughout Christchurch and within the central city.

- 6.2 CGL has signalled a clear intention to remain a significant investment and development entity in Christchurch despite the Christchurch earthquakes. As such CGL and its subsidiary companies are active participants in planning processes that affect its interests, including strategic planning documents (such as the RPS, LURP and Recovery Plans) and more specific and locally focused planning processes.
- 6.3 CGL is an active and frequent 'end user' of the provisions of District Plans, noting that these provisions significantly influence initial investment and development decisions and ultimately affect the buildings and activities that eventuate.

Scope of Submission

- 6.4 This submission relates to the whole of the Proposal, with a particular emphasis on the specific provisions addressed below and in detail in the table attached as Schedule 1.

Nature of the Submission

- 6.5 CGL's submission is that the notified Stage 2 Proposal does not yet achieve the requirements of the higher order documents to the extent necessary and therefore further amendment is necessary in order to do so.
- 6.6 Specifically, it is noted that Strategic Directions Objective 3.3.1 (which has primacy over the balance provisions of the Plan) requires the plan to minimise transaction costs and reliance on resource consents, reduce the number, extent and prescriptiveness of development controls and minimise requirements for notification and written approvals. It is CGL's submission that this Objective is not yet met by the Proposal.
- 6.7 CGL's position on the Proposal, including its points of support, points of opposition and amendments sought, is detailed below and identified in the table attached as Schedule1.

Reasons for the Submission

- 6.8 The detailed reasons for CGL's position are set out in its specific submissions on each chapter of the Proposal, set out in the table below.
- 6.9 For those provisions of the Proposal that CGL opposes, those provisions require amendment. This is because, without the amendments proposed by CGL, those provisions:
- (a) fail to give effect to the RPS;
 - (b) are not consistent with Strategic Objectives 3.3.1 and 3.3.2

- (c) do not have particular regard to the Statement of Expectation in the Canterbury Earthquake (Christchurch Replacement District Plan) Order 2014 ("Order");
- (d) are inconsistent with the purposes and provisions of other relevant planning documents, including the LURP;
- (e) will not promote sustainable management of resources, will not achieve the purpose of the Resource Management Act 1991 ("RMA") and are contrary to Part 2 and other provisions of the RMA;
- (f) will not enable the social, economic and cultural wellbeing of the Christchurch community and in particular will not provide the "right investment climate to enable recovery and sustain long term growth" as outlined in the Strategic Directions decision of the Independent Hearings Panel;
- (g) will not meet the reasonably foreseeable needs of future generations;
- (h) do not represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means; and
- (i) do not discharge the Council's duty under section 32 of the RMA.

6.10 Without limiting the generality of the above, further specific reasons for CGL's submission are set out in the table attached as Schedule 1.

6.11 The specific reasons for relief, as set out in Schedule 1, are summarised below.

Proposal 6 - General Rules - Noise

6.12 CGL generally supports the policies and objectives relating to the noise provisions, with the exception of the requirement to "minimise" adverse noise effects in Objective 6.1.1.1 and Policies 6.1.1.1.1 and 6.1.1.1.3. The requirement to "minimise" is too high of a bar for some activities and may not be appropriate in all circumstances.

6.13 The operative City Plan lists construction activities as being exempt from the noise standards. CGL seeks that construction activities are added to the list of activities exempt from the noise standards in the Proposal to reflect the status quo, and reduce reliance on resource consents.

6.14 CGL considers Rule 6.1.3.3 requires clarification regarding measurement of noise at, or beyond, the boundary with an adjacent transport zone. Specific changes are set out in the table at schedule 1.

6.15 In some instances the provisions in relation to noise in the notified Replacement District Plan are more stringent than those in the operative City Plan. In those instances (particularly where the noise standards in Table 1 rule 6.1.4.1.1.1 are more restrictive) CGL opposes the notified provisions and seeks such amendment as necessary to ensure that, as a minimum, the rules are no more prescriptive than those in the operative City Plan. CGL opposes rule 6.1.4.2.6, relating to ventilation systems, and seeks its deletion on the basis that it is inconsistent with the Strategic Directions and Statement of Expectations.

Proposal 6 - General rules - Glare

6.16 The objectives, policies and standards in relation to Glare are generally supported with the exception of the following points:

- (a) The references in Objective 6.3.1.1 and Policy 6.3.1.1.1 to energy efficiency and night sky viewing should be removed. These are issues better addressed through non-regulatory methods; and
- (b) CGL considers that the energy efficiency matters of discretion in 6.3.3.3 should be deleted as energy efficiency is better addressed through non-regulatory methods

Proposal 6 - General Rules - Waterbody Setbacks

6.17 CGL is generally neutral in respect of the rules relating to waterbody setbacks in section 6.6 (provided they remain no more onerous than those in the operative City Plan) but submits that objective 6.6.1.1 requires redrafting to recognise that the margins of waterbodies require management of, rather than protection from, adjacent activities. Specific wording is suggested in the table at schedule 1.

Proposal 6 - General Rules - Signs

6.18 CGL generally supports the objectives and policies relating to signs insofar as they enable the use of signage for businesses and communities. There is some scope for consolidation and simplification to provide clarity and remove duplication.

6.19 The activity standards in 6.8.3.1, P1 – P5 are supported where they provide greater clarity to users of the plan.

6.20 In respect of the built form standards in 6.8.4.2, CGL opposes those standards on the basis that they introduce rules on areas of signage that are more restrictive than those in the operative City Plan. CGL considers that:

- (a) The total area of signage should be based on a site's road frontage with the "multiplier" for signage set high enough to account for commercial needs for signage;
- (b) The individual area of a sign need not be controlled as the total area of signage is subject to controls addressing visual prominence;
- (c) The height of the signage should be limited to the height of the façade of a building.

Proposal 14 - Residential

6.21 CGL submits that the absence of a specific policy relating to guest accommodation in the Residential Proposal should be addressed. Policy 14.1.7.6 recognises non-residential activities in arterial corridors but does not adequately recognise or enable guest accommodation in appropriate locations, including in locations not in the arterial corridor. CGL seek a new policy specifically enabling guest accommodation in appropriate locations be included in the Residential Proposal.

Proposals 15 and 16 - Commercial and Industrial

6.22 CGL opposes the addition of the resource efficiency standards (15.8 and 16.8) in both the Commercial and Industrial proposals. The provisions are overly prescriptive and are likely to require increased reliance on resource consents. The standards are likely to increase the costs of development and are not appropriately dealt with in the District Plan.

Relief Sought

6.23 Suggested relief to deal with the concerns in CGL's submission is set out in schedule 1 and will be supplemented by evidence at the hearing.

6.24 It is however recognised that there may be other methods of relief that are able to address CGL's concerns, and the suggested revisions in schedule 1 do not limit the generality of the reasons for CGL's submission.

CARTER GROUP LIMITED

Date: 15 June 2015

Signature:



L J Semple (for the Submitter)

SCHEDULE 1: DETAILED SUBMISSIONS AND RELIEF SOUGHT

	Provision	Carter Group's submission	Relief sought
Chapters 1-3			
1.	Chapters 1-3	Carter Group note that changes may be required to provisions within these chapters as a result of its submissions below and/or following the submissions of other parties on the Proposals below.	Make any necessary consequential changes following decisions on the submissions below and the submissions of other parties.
Proposal 6: General rules and procedures - Noise			
2.	6.1.1.1 Objective: Adverse noise effects	Carter Group is concerned that an objective of 'minimising' adverse noise effects establishes too high a bar for some activities and this requirement may not be appropriate in all circumstances.	Amend 6.1.1.1 Objective as follows: <i>Manage a</i> Adverse noise effects on the amenity or health of people and communities are minimised, consistent with the anticipated outcomes of the receiving environment.
3.	6.1.1.1.1 Policy: Managing noise effects	Carter Group considers that policy 6.1.1.1.1 should seek to 'manage' rather than 'minimise' adverse noise effects, for the same reasons set out above in respect of objective 6.1.1.1.	Amend 6.1.1.1.1 Policy as follows: <i>a. Minimise Manage adverse noise effects by...</i>
4.	6.1.1.1.3 Policy: Activities in key locations	Carter Group considers that policy 6.1.1.1.3 should seek to 'manage' rather than 'minimise' adverse noise effects, for the same reasons set out above in respect of objective 6.1.1.1 and policy 6.1.1.1.1.	Amend 6.1.1.1.3 Policy as follows: <i>...whilst ensuring the adverse noise effects of activities on the surrounding community and environment are minimised managed to a level consistent with the anticipated outcomes of the receiving environment'</i>
5.	6.1.3.2 Exempt activities	Carter Group seeks that construction activities be added to the list of activities that are exempt from the noise standards, on the basis that this would be consistent with the status quo and would provide for the application of the detail within NZS 6803:1999 "Acoustics - Construction Noise" to construction activity, rather than the	Carter Group seeks that section 6.1.3.2 be amended by adding a new clause viii as follows: <i>Viii construction activities</i>

		general noise rules in the Proposed Plan.	
6.	6.1.3.3 Measuring noise	Carter Group seeks clarification in 6.1.3.3 regarding the measurement of noise at or beyond the boundary with an adjacent transport zone.	Carter Group seeks that 6.1.3.3 be amended as follows: <i>Measuring Noise 6.1.3.3</i> <i>Noise standards shall apply at or within the boundary of any site receiving noise from an activity, except where:</i> <i>i</i> <i>the site boundary is a boundary with a site in the Transport Zone, <u>in which case noise standards shall apply at or beyond the far boundary of the transport zone; or</u></i> <i>ii</i> <i>the standards specify otherwise.</i>
7.	6.1.4.1.1.1 Permitted activities Table 1	<p>Carter Group opposes the noise standards in 6.1.4.1.1.1 Table 1 where these are more stringent than the equivalent noise standards in the operative Plan.</p> <p>More restrictive noise standards will result in additional resource consent requirements with associated time and monetary costs and uncertainty. Carter Group do not consider that the operative noise provisions have resulted in significant or unacceptable noise effects that warrant an increased extent of regulation and control, particularly where Schedule 4 of the Order and the Strategic Directions objectives seek greater enablement of activities.</p> <p>For example, the Proposed Plan daytime (07:00-22:00) noise limits for commercial zones are 55 dBA Leq, 80 dBA Lmax. By comparison, the status quo for Group 3 zones are 57 dBA Leq and 85 dBA Lmax.</p> <p>Similarly, the proposed night time (22:00 – 07:00) limits of 45 dBA Leq and 70 dBA Lmax compares to the status quo of 49 dBA Leq and 75 dBA Lmax.</p> <p>Carter Group otherwise supports corresponding rules 6.1.4.1.1.2 RD1 and 6.1.4.1.1.4 NC2 where these require resource consent as a restricted discretionary activity for breaches of noise standards by 10 dB or less, and beyond this require consent as a non-</p>	<p>Carter Group seeks that Table 1 be amended so that the noise limits applicable to Commercial and Industrial zones are no more restrictive than the equivalent limits in the Operative Plan.</p> <p>Carter Group seeks that rules 6.1.4.1.1.2 RD1 and 6.1.4.1.1.4 NC2 be retained as notified.</p>

		complying activity.	
8.	6.1.4.2.3 Construction activities	<p>As set out above, Carter Group seeks that noise from construction activities be exempt from noise rules in the Proposed Plan, with the applicable New Zealand Standard providing detailed guidance as to the avoidance or mitigation of construction related noise effects.</p> <p>Such an approach is consistent with the status quo, reduces reliance on resource consents and provides for construction-specific noise to be managed by a construction-specific noise standard.</p>	Carter Group seeks that clause 6.1.4.2.3 be deleted in its entirety.
9.	6.1.4.2.6 Ventilation systems	<p>Carter Group opposes rule 6.1.4.2.6 in its entirety.</p> <p>Part a. of the rule relates to habitable spaces (in residential dwellings and guest accommodation) whilst parts b. and c. apply to air conditioning and ventilation systems universally.</p> <p>In both instances, the rules are highly prescriptive and complex and will result in additional and unnecessary regulatory control, with associated costs of compliance to land owners and developers. Administration, monitoring and enforcement of the rule is also likely to be difficult and costly.</p> <p>Furthermore, the rule is concerned with on-site rather than public or third-party effects where regulatory intervention might otherwise be required.</p> <p>For the reasons above, Carter Group considers that there is insufficient justification for imposing this regulation and control in the face of the Order and Strategic Directions objectives.</p>	Delete rule 6.1.4.2.6 in its entirety
Proposal 6: General rules and procedures - Temporary activities, buildings and events			
10.	6.2 Temporary activities, buildings and events generally	Carter Group supports section 6.2 Temporary activities, buildings and events in its entirety as drafted, noting the corresponding provisions provide greater clarity and enablement of temporary activities.	Retain 6.2 as notified.
Proposal 6: General rules and procedures - Glare			
11.	6.3.1.1 Objective: Outdoor lighting and glare	<p>Carter Group supports objective 6.3.1.1 to the extent that this provides for outdoor lighting whilst managing adverse effects.</p> <p>However, Carter Group opposes requirements within the objective for energy efficiency and the preservation or enhancement of night</p>	Amend 6.3.1.1 Objective by deleting references to energy efficiency and night sky viewing, and otherwise reword the objective to focus on the enablement of outdoor lighting whilst

		sky viewing opportunities on the basis that these matters are better addressed through non-regulatory methods.	managing adverse effects.
12.	6.3.1.1.1 Policy	Carter Group considers policy 6.3.1.1.1 requires equivalent amendments to those set out above in respect of objective 6.3.1.1.	Amend policy 6.3.1.1.1 by deleting references to energy efficiency and night sky viewing, and otherwise reword the policy to focus on the enablement of outdoor lighting whilst managing adverse effects.
13.	6.3.2 Glare Standards	Carter Group supports the Glare Standards as notified.	Retain 6.3.2 as notified.
14.	6.3.3 Matters of discretion	<p>Consistent with its submission on objective 6.3.1.1 and policy 6.3.1.1.1, Carter Group considers that energy efficiency matters should be pursued through non-regulatory methods and for that reason seeks deletion of energy-efficiency focused matters of discretion in clause 6.3.3.3. Carter Group generally supports the matters of discretion concerned with amenity (6.3.3.1) and transport safety (6.3.3.2).</p> <p>Carter Group particularly supports matter 6.3.3.1 a. i. which references Australian Standard AS 4282-1997, noting this is a best practice guideline.</p> <p>However, Carter Group opposes the energy efficiency matters of discretion (6.3.3.3) in their entirety. Carter Group considers that energy efficiency is a matter best promoted and encouraged through non-statutory initiatives rather than through regulation. Carter Group also notes that as no rules are proposed in respect of energy efficiency, the inclusion of assessment criteria for this issue will result in inconsistency between permitted and non-permitted light fixtures despite the only distinction being lux spill.</p>	Delete matters of discretion in 6.3.3.3.
Proposal 6: General rules and procedures - Water Body Setbacks			
15.	6.6 Water Body Setbacks generally	Carter Group is concerned with the 'protection' focus of objective 6.6.1.1 and considers this objective requires redrafting to recognise that activities in the margins of waterbodies require management, with regard to the identified values for waterbodies and acknowledging that such values will apply to varying degrees	Redraft objective 6.6.1.1 as follows <i>6.6.1.1 Objective – Protection of water body margins from inappropriate use</i> <i>a. Activities in the margins of water bodies and their adverse effects</i>

		<p>throughout the City.</p> <p>Carter Group is otherwise neutral in respect of the rules and assessment criteria in section 6.6 on the basis that the provisions will be no more onerous than the status quo under the operative Plan.</p>	<p><u>are managed in a way that recognises or enhance the different values and functions of water bodies, including Water body margins are protected from activities that have adverse effects on flood management; water quality; riparian or aquatic ecosystems; the natural amenity and character of the water body; heritage or cultural values; and access for recreation and maintenance, and where possible these values or functions are enhanced.</u></p>
Proposal 6: General rules and procedures - Signs			
16.	6.8.1.1 Objective 1	Carter Group generally supports the enablement of signage for businesses and communities within Objective 1.	Retain Objective 1 as notified.
17.	6.8.1.1.1 - 5 Policies 1 - 5	Carter Group generally supports policies 1-5 as notified, but considers scope exists for the consolidation and simplification of these policies so as to provide greater clarity and avoid duplication.	Retain policies 1-5 as notified, or otherwise consolidate and simplify these.
18.	6.8.3.1 Permitted activities - P1, P2	Carter Group supports permitted activities P1 and P2 relating to signs permitted by other bylaws and regulation and signs controlled by relevant government ministries/departments and other controlling authorities. Carter Group considers it appropriate that such signs are regulated or controlled through those means, in order to provide certainty and clarification for plan users that such signs are covered outside of the Proposed Plan and to avoid duplication of controls.	Carter Group seeks the retention of permitted activities P1 and P2 as notified.

19.	6.8.3.1 Permitted activities – P1 - P5	Carter Group supports P1-P5, where this provides for signs authorised by other regulation and temporary signs. These provisions provide clarity to users of the Plan and avoid unnecessary resource consents.	Retain P1 - P5 as notified.
20.	6.8.4.2 Built form standards - Signs attached to buildings	<p>Carter Group opposes rule 6.8.4.2 on the basis that it generally introduces rules on the area of signage that are more restrictive than the status quo.</p> <p>Carter Group considers that the operative signage rules are unnecessarily restrictive and result in significant resource consenting requirements for commercial signage. In particular, for sites where the total area of signage has been exceeded, any additional signage regardless of its size requires consent. For this reason, Carter Group considers that the total allowance for signage needs to be carefully established and sufficiently generous so as to avoid the need for a significant number of resource consents over the life of the Plan.</p> <p>Carter Group considers that:</p> <ol style="list-style-type: none"> 1. The total area of signage should be based on a site’s road frontage, noting that this length is fixed and easily understood. The ‘multiplier’ for signage should be set high enough to account for the signage needs of commercial activities. 2. The individual area of a sign need not be controlled, on the basis that the total area provides the primary means of controlling signs and its visual prominence, rather than the constitution of individual signs within this limit. 3. The height of signage should be limited to the façade height of a building, but otherwise unrestricted, noting that most signage will be established at lower levels and higher signage will be viewed against the backdrop of the building. 	<p>Carter Group seeks that rule 6.8.4.2 be amended as follows:</p> <p>For zones where frontage length determines signage area, reference <i>road frontage</i> length not <i>building frontage</i> length.</p> <p>Increase the area of permitted signage for commercial zones to recognise the extent of signage required in these locations and avoid a frequent need for resource consent.</p> <p>Amend height controls for signage so that the maximum height of a sign is the façade height of the building it is placed upon.</p>
Proposal 8 Subdivision & Development			
21.	8.7-8.8 Earthworks generally	<p>Carter Group generally supports the earthworks provisions in section 8.7 as notified.</p> <p>Carter Group specifically supports the exemptions listed in 8.8.5.</p>	Retain section 8.7 and 8.8 as notified

Proposal 14 Residential			
22.	14.1 Residential- objectives and policies	<p>Carter Group has extensive property holdings within the Avon Loop part of the Central City Residential environment, including the Holiday Inn on Avon site (Willow/Oxford corner) and former Star and Garter Hotel site (Nova/Barbadoes corner).</p> <p>The Holiday Inn on Avon hotel has been an established and successful travellers' accommodation activity in this location- serving the local community and visitors to Christchurch. The Holiday Inn is appropriately recognised in the operative City Plan and in the Residential Chapter of the Christchurch Central Recovery Plan as a Living 5 (travellers accommodation) zone.</p> <p>Whilst these sites are within the central city and will therefore be the subject of phase 3 of the District Plan Review, provisions in phase 2 concerning guest accommodation in the Residential Chapter may be of relevance to these sites.</p> <p>In that respect, Carter Group is concerned that no specific objectives or policies recognise the role and importance of travellers' accommodation activities to the City and the need to specifically enable such activity in recognised locations.</p> <p>To the extent that policy 14.1.7.6 recognises non-residential activities in arterial corridors, this does not adequately recognise or enable guest accommodation activity, including guest accommodation activity that is not located on arterial locations and/or does not strictly accord with the criteria listed in (i)-(iii) of the policy.</p> <p>Carter Group seeks that a new policy specifically enabling guest accommodation in appropriate locations be provided in the Plan. In the absence of such a policy in Phase 2 as notified, Carter Group proposes that operative policy 11.3.4 be carried over into the Proposed Plan.</p>	<p>Carter Group seek the insertion of a specific policy recognising and enabling travellers accommodation throughout the City in appropriate locations.</p> <p>Carter Group propose the following new policy as one possible form of relief for its submission:</p> <p><u>New Policy: Guest accommodation To enable the accommodation needs of travellers and visitors to the City to be met in defined locations usually on arterial or collector roads, while ensuring that the amenity values of adjoining residential areas are not adversely affected.</u></p>
23.	14.2.4.1 Area specific permitted activities P2	<p>Carter Group support the provision for guest accommodation as a permitted activity in areas subject to the Accommodation and Community Facilities Overlay (where this is comparable to the operative Living 5 zone).</p>	<p>Carter Group seeks retention of 14.2.4.1 P2 as notified.</p>

Proposal 15 Commercial		
<p>24.</p>	<p>15.7.1 Resource efficiency - Rules</p>	<p>Carter Group opposes section 15.7.1 which concerns resource efficiency in Commercial Zones.</p> <p>Carter Group's opposes the resource efficiency rules for the same reasons expressed by a number of submitters (including companies associated with Carter Group) in relation to equivalent provisions on the Residential Chapter in Phase One.</p> <p>Specifically, those submissions expressed concerns in terms of:</p> <ul style="list-style-type: none"> The prescriptive nature of the rules and likely requirement for increased resource consents for applicants; The costs imposed by the rules, including the increased development costs to achieve compliance and the increased costs of administering the rules; The appropriateness of resource efficiency rules in the District Plan, where the Building Code and/or non-regulatory methods may be more appropriate means of applying such requirements; Consistency with the Statement of Expectations and the LURP. <p>For the reasons above and noting Strategic Directions objective 3.3.1 and 3.3.2 Carter Group consider resource efficiency rules are not the most appropriate methods to give effect to relevant objectives in the Plan.</p>
<p>Proposal 16 Industrial</p>		
<p>25.</p>	<p>16.8 Resource efficiency - Rules</p>	<p>Carter Group opposes section 16.8 which concerns resource efficiency in Industrial Zones for the same reasons set out above in respect of the equivalent provisions for the Commercial zone in 15.7.1.</p>
<p>Carter Group seeks the deletion of section 16.8 in its entirety.</p>		