Appendix 4 - Recommended Decisions on Submissions

Submissions are sorted by Submitter ID# (See appendix 5) and sorted by further by submission point.
Further submissions are highlighted grey, and inserted after the submission they are further to.
When a submission or further submission has been referred to within the Section 42A Report, the Sub Code is referenced.
The final column, "Recommended Decision", contains the planning officers' recommended decision on the submission point. In most cases, this refers to a section in the Section 42A Report where the submissions and recommended decisions are discussed.

Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter	Recommended Decision	
Grahame Hall	S_01	S_01_01			01. Tourist Accommodation Definition	Interpretation	Support	Submitter supports the proposal to change from the definition of Tourist Accommodation to Visitor Accommodation.	No specific relief sought	No specific relief sought	
John Thompson	S_02	S_02_01			12. General support and opposition	Various	Support	Submitter notes that the current district plan contains wording that can lead to unintended consequences and supports the intent and direction of plan change 10.	Adopt Plan Change 10.	Noted	
Chris Wiringi	S_03	S_03_01			11. Other	RESZ-R28	Oppose/amend	Submitter requests the removal of heavy vehicles from Whitworth Road in particular the buses due to shaking of the houses.	Do something to get the buses off the street.	Reject as this is outside the scope of PC 10	
Luke Nelson	S_04	S_04_01			05. Boundary Adjustment Definition	Interpretation	Support	Submitter supports the proposed new definition of boundary adjustment.	No specific relief sought	No specific relief sought	
McKenzie & Co Consultants Limited	S_04	S_04_01	F_22	F_22_01	05. Boundary Adjustment Definition	Interpretation	Support in part	MCCL support the submission point in support of the proposed new definition of boundary adjustment. .	MCCL seek further refinement of the new definition to refer to 'site' in place of 'allotments'. The reasons for this are as per our original submission	Refer to section 3.8.2 and 3.8.3	
Luke Nelson	S_04	S_04_02			06. Site definition	Interpretation	Support	Submitter supports the amendment to the definition to update to include record of title to match current LINZ naming.	No specific relief sought	No specific relief sought	
Luke Nelson	S_04	S_04_02			10. Wireless Telecommunications Rule	SUB-S9(3)(C)(i)	Amend or support in part	Submitter requests that in addition to providing for wireless telecommunication at the time of subdivision, that council also removes the requirement for gas reticulation noting that it is a non-essential network utility as opposed to power/telecommunication which are essential. They note that it is inefficient to require that a gas connection be provided where it is not wanted by the owner.	In addition to proposed amendments, also remove requirement for applicant to provide for gas reticulation.	Reject as this is outside the scope of PC 10	
McKenzie & Co Consultants Limited	S_04	S_04_02	F_22	F_22_11	06. Site definition	Interpretation	Support	MCCL support the submission point in support of the proposed changes to SUB-S9(3)(C)(i). Their reasons generally align with those in their original submission.		Refer to section 3.9.2 and 3.9.3	
Luke Nelson	S_04	S_04_03			10. Wireless Telecommunications Rule	SUB-S9(3)(C)(ii)	Amend or support in part	The submitter does not support the wording as it stands and suggests that it should be a separate point as it has a different intent to the first part of the clause (nothing to do with underground provision of services really). For rural properties (any non-urban property without fibre) wireless communications are the first choice not something to be used where reticulated services are not practicable.	The submitter requests that the provision be amended and included as a separate clause as follows: "For telecommunications where wireless technology can provide a higher level of service than reticulated networks it can be used."	Refer to section 3.8.2	
McKenzie & Co Consultants Limited	S_04	S_04_03	F_22	F_22_12	10. Wireless Telecommunications Rule	SUB-S9(3)(C)(ii)	Support in part	MCCL generally support the submission point in support of the proposed changes and amendments to SUB-S9(3)(C)(ii). However, they consider that further refinement of this provision is required, in light of the points raised in our original submission.		Refer to section 3.8.2	
Luke Nelson	S_04	S_04_04			05. Boundary Adjustment Definition	SUB-S11(1)	Oppose	The submitter does not support the proposed amendments, noting that the intent of SUB-S11(1)(d) is to ensure no lifestyle-sized lots as a controlled activity however if that clause is not met it is not appropriate to require a lifestyle lot allocation under SUB-S6 or assessment against SUB-S10. If a lifestyle sized lot is created from an existing title on boundary adjustment it is a discretionary activity under SUB-R26(2) and usually the reason why such an activity is done is to allow the balance area to increase and be more suitable for farming while retaining minimum non-productive land around an existing title which often has a house. Existing titles already have rights to a house and a minor dwelling and the proposed change removes a pathway for aggregation of productive rural land into balance titles which is contrary to the intention for rural land!	Submitter notes that the creation of lifestyle lots is a completely unrelated activity compared to that of a boundary adjustment of existing lots and they request that the two activities remain separate. The submitter requests that the reference to "or relocation" should be removed from SUB-S11 as this is a hangover for the old "bounday relocation" rule.	Refer to section 3.8.2 and 3.8.3	
McKenzie & Co Consultants Limited	S_04	S_04_04	F_22	F_22_02	05. Boundary Adjustment Definition	SUB-S11(1)	Support	MCCL support thei submission point in opposition to the proposed changes to SUB-S11(1). They note that the submission covers matters and reasons that closely align with those raised in their original submission.		Refer to section 3.8.2 and 3.8.3	
Luke Nelson	S_04	S_04_05			09. Reversing onto Rights of Way	APP1	Support in part	The submitter supports the updated definition allowing onsite turning on a right of way / private way. However they note that consideration should be given to whether 'access leg' or similar should also be added.	Submitter requests that consideration is given as to whether the reference to "access leg" or similar should be included also.	Refer to 3.12.2 and 3.12.3	
Tristam Apikotoa	S_05	S_05_01			12. General support and opposition	Various	Support	The submitter supports the proposed changes in full. The submitter notes in particular the proposed amendments to home based business provisions and also community housing and other shared living provisions.	That the whole plan change go ahead.	Noted	
Michelle	S_06	S_06_01			08. Home-based Business Definition and Rules	RESZ-R20 & CCZ-R15	Amend or support in part	The submitter opposes the restriction on the sale of goods from a home based business and believes that an operator should be able to sell goods from your home based business noting that this is what helps keep these businesses being able to survive by having the extra income.	Amend provision to allow for the sale of goods from a home-based business.	Reject as this is outside the scope of PC 10	
Michelle	S_06	S_06_02			11. Other	RESZ-R28	Oppose/amend	The submitter requests that council amends Rule R28 to allow the parking of heavy vehicles on their site if the site allows.	Amend rule R28 to allow for parking of heavy vehicles as long as their is space on your property.	Reject as this is outside the scope of PC 10	
Samuel Martin	S_07	S_07_01			12. General support and opposition		N/A	The submitter opposes all development that comes at the expense of ratepayers noting that Rotorua Lakes Council already has the highest rates costs compared to other tourist locations in New Zealand.	Submitter requests that any proposed changes should be made without increasing rates.	Noted	

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Denise Allen	S_08	S_08_01			12. General support and opposition		N/A	The submitter requests that no amendments introduced through plan change 10 reduce, narrow, or unintentionally restrict existing development flexibility for rural landowners whether directly or indirectly. Specifically the submitters seeks retention of the current ability to: • Establish residential accommodation where presently enabled under the operative Rural Zone provisions; • Retain flexibility in how dwellings are interpreted and counted per title or per site; • Maintain future options for lawful rural land use and resale value.	The submitter requests that Plan Change 10 does not reduce existing development rights or flexibility available under the current Operative District Plan.	Noted	
Marnel	S_09	S_09_01			08. Home-based Business Definition and Rules	RESZ-R20 & CCZ-R15	Support in part	The submitter supports the intention of improving clarity and reducing unnecessary consenting costs particularly in relation to home-based businesses and compliance pathways for non-typical residential activities.	The submitter requests that any compliance pathway for non-typical residential activities remains affordable and accessible. They also request that Implementation costs for ordinary homeowners are reduced wherever possible	Noted	
Marnel	S_09	S_09_02			03. Community Housing definition and provisions	Interpretation and objectives in Residential zones	Support in part	The submitter supports the intention of improving clarity in particular in regards to the community housing provisions.	The submitter requests that the community housing provisions genuinely enable rather than restrict affordable housing supply and also no increase to the rates as a result of this plan change.	Noted	
Ara Poutama Aotearoa- Department of Corrections	S_09	S_09_02	F_24	F_24_07	03. Community Housing definition and provisions	Intepretation and objectives in Residential zones	Oppose in part/amend	The submitter supports enabling affordable housing supply, however considers the exclusions in the community housing definition will not achieve that outcome, particularly in terms of increasing the availability of housing to meet the diverse range of housing needs within New Zealand communities. That includes the necessary accommodation and support provided by Ara Poutama and other agencies for people serving sentences or orders imposed by the courts and the New Zealand Parole Board within the community.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ngāti Pikiao Environmental Society	S_10	S_10_01			01. Tourist Accommodation Definition	Interpretation	Amend or support in part	The Society supports alignment with National Planning Standards where clarity is improved. However, the proposed replacement of "Tourist Accommodation" with "Visitor Accommodation" must ensure: • Emergency housing cannot be characterised as visitor accommodation. • Long-term occupation (28+ days) is clearly excluded. • Boarding houses are treated as residential activities. Rotorua's recent experience demonstrates definitional ambiguity can materially undermine community wellbeing.	The submitter requests that council includes clarification in regards excluding occupation exceeding 28 consecutive days and confirming emergency/transitional housing are residential activities.	Refer to section 3.2.2	
Ngāti Pikiao Environmental Society	S_10	S_10_02			02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-R8A, COMZ-R33A, CC-17B, CCZ-33B	Amend or support in part	The submitter notes that providing a discretionary status improves oversight. However, cumulative effects, infrastructure loading, and social impacts require explicit assessment criteria.	The submitter requests that PC10 Inserts assessment criteria addressing the following: • Infrastructure capacity • Lake catchment effects • Cumulative concentration • Cultural impact where near Māori land or marae	Refer to section 3.3.2 and 3.3.3	
Hao Boutique Hotel Group	S_10	S_10_02	F_25	F_25_07	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-R8A, COMZ-R33A, CC-17B, CCZ-33B	Support in part	The submitter supports the submission point in principle supporting the discretionary activity status rule changes. HBHG support the request for further assessment criteria to be provided. This will assist with providing a clear framework for the assessment of such resource consent applications. The submitters do not specifically support the specific assessment criteria topics listed in their relief support.		Refer to section 3.3.2 and 3.3.3	
Ara Poutama Aotearoa- Department of Corrections	S_10	S_10_02	F_24	F_24_01	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-R8A, COMZ-R33A, CC-17B, CCZ-33B	Oppose	The submitter considers that Discretionary status for "Other Residential Activities not expressly provided for" in rules RESZ-R8A, COMZ-R33A, CCZ-17A, and CCZ-38B would not support the increased supply of housing to meet the diverse needs of communities, and a Discretionary activity status is not justified by reference to any environmental effects resulting from the Other Residential Activities.		Refer to section 3.3.2 and 3.3.3	
Ngāti Pikiao Environmental Society	S_10	S_10_03			03. Community Housing definition and provisions	Interpretation and objectives in Residential zones	Amend or support in part	The submitter notes that clarification is supported. However they note that public safety references must avoid stigmatization and be effects-based.	The submitter requests that PC10 Requires: • Management plans for larger facilities • Assessment of proximity to sensitive community facilities • Infrastructure adequacy evaluation	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Käinga Ora – Homes and Communities	S_10	S_10_03	F_23	F_23_01	03. Community Housing definition and provisions	Interpretation and objectives in Residential zones	Oppose	The submitter opposes the addition of management plans for community housing and proximity assessments. The submitter is concerned that the introduction of such assessment matters may give rise to assessment of matters beyond the scope of RMA effects. They note that assessment of proximity to sensitive activities is also unnecessary given that the activity is as a residential activity.	Retain the operative plan assessment criteria.	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ara Poutama Aotearoa- Department of Corrections	S_10	S_10_03	F_24	F_24_01	03. Community Housing definition and provisions	Interpretation	Oppose	The submitter considers the exclusions in the community housing definition, requiring management plans for larger facilities, and assessment of proximity to sensitive activities will not achieve the submitters intent of ensuring the provisions avoid stigmatisation and are effects based. Rather they will result in a planning outcome which discriminates between activities based on the circumstances of the residents rather than for sound resource management reasons and is not based on any environmental effects that can and should be addressed under the RMA.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ngāti Pikiao Environmental Society	S_10	S_10_04			04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Support	The submitter supports the proposed changes.	Retain discretionary default status.	Refer to section 3.7.2 and 3.7.3	
Hao Boutique Hotel Group	S_10	S_10_04	F_25	F_25_04	04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Oppose	HBHG oppose the submission point in support of the proposed change to discretionary activity default status in CCZ. The reasons for this are as per their original submission.		Refer to section 3.7.2 and 3.7.3	

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Ngāti Pikiao Environmental Society	S_10	S_10_05			05. Boundary Adjustment Definition	SUB-S11(1)	Amend or support in part	The submitter notes that rural lifestyle fragmentation affects lake quality, indigenous biodiversity, and rural production.	Insert assessment criteria for: • Nutrient discharge implications • Catchment-level effects • Reverse sensitivity impacts • Prevention of density circumvention	Refer to section 3.8.2 and 3.8.3	
McKenzie & Co Consultants Limited	S_10	S_10_05	F_22	F_22_03	05. Boundary Adjustment Definition	SUB-S11(1)	Oppose	MCCL oppose the submission point in support of the proposed changes to SUB-S11(1). We recognise that land fragmentation is an outcome of subdivison and has associated potential adverse effects in relation to such matters as lake quality, indigenous biodiversity, and rural production. However, for the reasons in our original submission, we consider that boundary adjustment subdivisions between adjoining titles, that may result in a lifestyle-sized lot, have less potential for the generation of significant adverse effects, given they move boundaries between existing developable sites. The Operative District Plan (ODP) recognises the distinction between these two different types of subdivison activities and deals with them through the assigned rules, activity statuses and sets of performance standards The discretionary activity pathway of the ODP's subdivison provisions allows for all such associated effects of a boundary adjustment subdivison to be considered and assessed on merit. There are a range of assessment criteria and objectives and policies that already provide a clear framework for the assessment of such applications.		Refer to section 3.8.2 and 3.8.3	
Ngāti Pikiao Environmental Society	S_10	S_10_06			06. Site definition	Interpretation	Support	The submitter supports the proposed changes.	Retain as notified	Refer to section 3.9.2 and 3.9.3	
Ngāti Pikiao Environmental Society	S_10	S_10_07			07. Industrial Definition	Interpretation	Support	The submitter supports the proposed changes	Retain as notified	Refer to section 3.10.2 and 3.10.3	
Ngāti Pikiao Environmental Society	S_10	S_10_08			08. Home-based Business Definition and Rules	RESZ-R20 & CCZ-R15	Amend or support in part	The submitter supports the proposal with amendments	The submitter requests that PC10 retains limits on: • Non-resident employees • Outdoor storage • Heavy vehicle parking	Raefer to section 3.11.2 and 3.11.3	
Ngāti Pikiao Environmental Society	S_10	S_10_09			10. Wireless Telecommunications Rule	SUB-S9(3)(C)(ii)	Amend or support in part	The submitters supports the proposal with amendments	The submitter requests that the provisions require a visual and cultural effects assessment where infrastructure is visible from marae or culturally significant landscapes.	Reject as this is outside the scope of PC 10	
Mikail Nicolaas Steens	S_11	S_11_01			01. Tourist Accommodation Definition	Interpretation	Amend or support in part	The submitter supports the general intent of Plan Change 10 However, they oppose any aspect of Plan Change 10 that would, in effect, tighten or make more restrictive the rule pathway for small-scale, owner-occupied short-stay accommodation within an otherwise normal dwelling in RESZ1 (for example, a downstairs area used for Airbnb), whether by definitional change, terminology updates, or reclassification into an activity status that requires discretionary consent. The submitter is concerned that the proposed approach may create uncertainty and/or unintentionally capture ordinary homeowner arrangements within a discretionary consenting pathway intended for larger-scale visitor accommodation operations. This would impose unnecessary compliance costs and uncertainty on homeowners for low-impact activity, when effects can be appropriately managed through clear permitted thresholds and standards. The submitter seeks amendments to ensure Plan Change 10 provides certainty and proportionality by clearly distinguishing commercial-scale visitor accommodation from small-scale owner-occupied short-stay accommodation that remains ancillary to residential use, and by ensuring the District Plan does not unintentionally require resource consent for the latter where effects are minor and manageable.	Clarify and confirm that small-scale, owner-occupied short-stay accommodation within a dwelling (including use of part of a dwelling such as a downstairs area for Airbnb-style stays) is treated as ancillary to residential use and is not unintentionally captured by a discretionary activity category for "visitor accommodation", provided it meets clear standards/thresholds. Ensure the definitions and activity rules for Visitor Accommodation, Holiday Rental Accommodation, and Bed and Breakfast are clear, internally consistent, and outcome-certain, including clear guidance on how common homeowner arrangements are classified. If Council considers consent control is necessary for some short-stay accommodation, introduce clear, proportionate thresholds (e.g., scale of operation, number of guest rooms/guests, whether the owner resides on site, frequency/turnover) so that only higher-impact operations trigger a discretionary consenting pathway, and low-impact homeowner activity is not unnecessarily consented.	Refer to section 3.2.2	
Hao Boutique Hotel Group	S_11	S_11_01	F_25	F_25_01	01. Tourist Accommodation Definition	Interpretation	Support in part	The submitter supports this submission point that sought to ensure the activities of Visitor Accommodation, Holiday Rental Accommodation, and Bed and Breakfast are clearly distinguished, with definitions and activity rules that are consistent, and outcome-certain, with appropriate guidance for interpretation/application.	The submitter requests that any further distinctions and clarifications are followed through.	Noted	
Stratum Consultants Ltd	S_12	S_12_01			01. Tourist Accommodation Definition	Interpretation	Amend or support in part	The submitter supports adopting the National Planning Standards definition of "Visitor Accommodation", except to the extent necessary to expressly exclude "Bed and Breakfast" and "Holiday Rental Accommodation."	Support the change to the definition of visitor accommodation.	Refer to sections 3.2.2 and 3.2.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_12	S_12_01	F_28	F_28_01	01. Tourist Accommodation Definition	Interpretation	Oppose	The submitter supports the intent of Plan Change 10 to improve clarity and align definitions with the National Planning Standards but opposes aspects of the proposed changes due to their unintended impacts on emergency and supported housing. The submitter argues that replacing "Tourist Accommodation" with "Visitor Accommodation" effectively reclassifies motels and boarding houses used for emergency housing as residential activities, leading to more restrictive consenting pathways without evidence of increased environmental effects. The submitter considers the approach creates an unjustified imbalance that favours visitor accommodation while constraining emergency and supported housing, potentially undermining the Government's ability to respond quickly to acute housing needs and conflicting with national direction on housing supply and access.		Refer to sections 3.2.2 and 3.2.3	

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Hao Boutique Hotel Group	S_12	S_12_01	F_25	F_25_02	01. Tourist Accommodation Definition	Interpretation	Support in part	The submitter supports this submission point supporting the new Visitor Accommodation definition as proposed.	The submitters request that further clarity is added to the new definition in relation to 'ancillary activities'.	Refer to sections 3.2.2 and 3.2.3	
Stratum Consultants Ltd	S_12	S_12_02			02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-O7, RESZ-O14, RESZ-O17	Oppose	The submitter opposes the proposed insertion of "public safety" into the relevant objectives and policies. The submitter notes that the term is ambiguous and lacks clear parameters for assessment within a resource management context. There is no reliable or objective mechanism to assess how future occupants of a property may behave, nor is it appropriate for land use planning provisions to attempt to regulate individual behaviour in this manner. Introducing such terminology risks subjective interpretation and inconsistent application, without delivering tangible planning outcomes.	The submitter requests that Council removes the reference to "public safety in objectives RESZ-O7, RESZ-O14 and RESZ-O17	Refer to section 3.6.2 and 3.6.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_12	S_12_02	F_28	F_28_04	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-O7, RESZ-O14, RESZ-O17	Support	The submitter considers that introducing "public safety" shifts the focus of the District Plan away from effects-based resource management and into matters relating to the perceived characteristics or legal status of occupants. These are not matters that can be reliably assessed through land-use planning provisions and are more appropriately addressed through other regulatory and social service systems. The submitter is concerned that the inclusion of "public safety" in these objectives creates legal risk, including the risk that the provisions are ultra vires under the Resource Management Act. It also introduces a high degree of subjectivity and inconsistency into decision-making, as there is no clear or objective mechanism for assessing public safety outcomes through a resource consent process. Further, the submitter considers that these provisions raise human rights and discrimination concerns, particularly where housing activities may be treated differently based on who lives there, rather than how the activity functions or the environmental effects it generates.	The submitter supports the submission points seeking deletion of "public safety" references in residential objectives to retain an effects-based, lawful, and certain planning framework	Refer to section 3.6.2 and 3.6.3	
Hao Boutique Hotel Group	S_12	S_12_02	F_25	F_25_08	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-O7, RESZ-O14, RESZ-O17	Support	The submitter supports the submission point to remove references to 'public safety' in the objectives and policies. The submitter notes that they generally agree with the supporting comments. The submitter considers that the Operative objectives and policies already address public safety matters through various policies and assessment criteria that seek outcomes for attractive and safe streets and public open spaces, and passive surveillance, eg. RESZ-P3 and assessment criteria CCZ-MC1 and CCZ-MDA.		Refer to section 3.6.2 and 3.6.3	
Ara Poutama Aotearoa- Department of Corrections	S_12	S_12_02	F_24	F_24_03	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-O7, RESZ-O14, RESZ-O17	Support	The submitter supports the submission on the basis that inclusion of "public safety" into the residential objectives will result in a planning outcome which discriminates between activities based on the circumstances of the residents rather than for sound resource management reasons and is not based on environmental effects that can or should be addressed under the RMA.		Refer to section 3.6.2 and 3.6.3	
Stratum Consultants Ltd	S_12	S_12_03			04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Oppose	The applicant opposes the proposal to make the default activity status within the City Centre Zone Discretionary rather than Permitted. The submitter notes that the City Centre should be an enabling environment that encourages investment, growth, and redevelopment. Introducing additional consenting requirements will increase costs, extend timeframes, and create further uncertainty for developers and landowners. Given the current economic climate and the presence of vacant commercial premises, additional regulatory barriers are counterproductive. In their view, the proposed change seeks to address a problem that has not been clearly demonstrated and risks undermining the vitality of the City Centre. The submitter requests that if Council have issues with activities being established in the city centre zones without the need of a resource consent, then deeper analysis should be undertaken to identify what these specific activities actually are. Once understood, these activities can then be listed as required resource consent with an appropriate activity status assigned to them, rather than taking a generic sledgehammer approach.	Retain the existing permitted activity status (CCZ-R1) for unspecified activities within the City Centre Zone.	Refer to section 3.7.2 and 3.7.3	

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Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_12	S_12_03	F_28	F_28_32	04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Support	HUD supports this submission point opposing the use of a blanket discretionary default activity status in the City Centre as this approach is not supported by targeted, effects-based analysis. HUD considers the proposed changes are not supported by the s32 analysis and risk unintended consequences. HUD considers that broad discretionary mechanisms and catch-all rules, rather than clearly identifying and regulating specific activities of concern, creates unnecessary regulatory burden and uncertainty. This approach increases consenting costs and the likelihood of public notification without demonstrating that such outcomes are required to manage environmental effects. Drawing on HUD's experience with emergency housing resource consents in Rotorua, discretionary and non-complying pathways have resulted in significant regulatory friction, delay, and opposition unrelated to land-use effects. HUD is concerned that similar outcomes would arise under the proposed City Centre provisions, inhibiting the timely delivery of housing and other activities that support community wellbeing.	HUD therefore supports submission points seeking a more targeted and proportionate approach that retains an enabling planning framework while addressing demonstrated effects.	Refer to section 3.7.2 and 3.7.3	
Hao Boutique Hotel Group	S_12	S_12_03	F_25	F_25_05	04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Support	HBHG support their relief sought to retain the existing default permitted activity status in CCZ. They support their submission points which align with and reiterate our concerns with the proposed changes to this default rule, as per our original submission.		Refer to section 3.7.2 and 3.7.3	
Ara Poutama Aotearoa- Department of Corrections	S_12	S_12_03	F_24	F_24_04	04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Support	Ara Poutama supports the submission on the basis the role of the City Centre Zone (as per the objectives) is to achieve a vibrant city centre that is the primary centre for the establishment and operation of a diverse range of activities. Rather than applying a generic catch all approach, those activities that require resource consent should be specifically identified based on a demonstrated need for consent due to their adverse effects.		Refer to section 3.7.2 and 3.7.3	
Kāinga Ora – Homes and Communities	S_12	S_12_03	F_23	F_23_02	04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Support	Kāinga Ora supports the submission and agrees that those activities the Council wish to restrict should be outlined and an appropriate activity status provided.	Retain the existing permitted activity status (CCZ-R1) for unspecified activities within the City Centre Zone.	Refer to section 3.7.2 and 3.7.3	
Stratum Consultants Ltd	S_12	S_12_04			02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	CCZ-17A	Amend or support in part	The submitter supports the inclusion of Rule CCZ-R17A "Other residential activities not expressly stated in this stable. The submitter requests that the rule should remove the phrase "where, the activity is not located on the ground floor". The also note that this rule should be relevant to all of these types of residential activities and be made discretionary whether they are on the ground floor or above. This also links in with their request to retain Rule CCZ-R1 discussed in submission point S_12_02.	Support Rule CCA-R17A but with amendment.	Refer to section 3.3.2 and 3.3.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_12	S_12_04	F_28	F_28_07	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	CCZ-17A	Oppose in part/amend	The submitter considers that Rule CCZ-17A, which captures "other residential activities not expressly stated", lacks sufficient precision and creates significant uncertainty as to which activities require resource consent, and which effects are to be managed. The submitter is concerned that removing locational qualifiers, such as whether an activity is located on the ground floor, does not resolve the underlying issue that the rule is overly broad and may capture activities of a residential nature that do not give rise to adverse environmental effects. This approach increases regulatory discretion and the likelihood of public notification without demonstrating that such controls are necessary.The submitter considers that this provision is contrary to the stated objectives of PC10, as it reduces certainty, increases regulatory friction, and undermines the ability to deliver responsive housing solutions in the City Centre.		Refer to section 3.3.2 and 3.3.3	
Hao Boutique Hotel Group	S_12	S_12_04	F_25	F_25_09	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	CCZ-17A	Support	The submitter supports the submission point to retain new Rule CCZ-R17A with amendment as per their submission.		Refer to section 3.3.2 and 3.3.3	
Ara Poutama Aotearoa- Department of Corrections	S_12	S_12_04	F_24	F_24_05	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	CCZ-17A	Oppose	The submitter considers that Discretionary status for "Other Residential Activities not expressly provided for" would not support the increased supply of housing to meet the diverse needs of communities, and a Discretionary activity status is not justified by reference to any environmental effects resulting from the Other Residential Activities.		Refer to section 3.3.2 and 3.3.3	
Kāinga Ora – Homes and Communities	S_12	S_12_04	F_23	F_23_03	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	CCZ-17A	Oppose	The submitter opposes the introduction of rule CCA-R17A consistent with Kāinga Ora submissions S_23_06 which seeks the deletion of a similar rule from the residential zones and Kāinga Ora support for S_12_03 to retain permitted activity status for unlisted activities in the CCZ.	Delete rule CCA-R17A	Refer to section 3.3.2 and 3.3.3	

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Stratum Consultants Ltd	S_12	S_12_05			05. Boundary Adjustment Definition	SUB-S11(1)	Amend or support in part	The applicant supports adopting the National Planning Standards definition of "Boundary Adjustment" to ensure consistency and alignment with national direction. Furthermore, the amendment to SUB-S11 is also supported where it clarifies which rule framework needs to be assessed when non-compliance with the boundary adjustment rule occurs. Previously, the use of this rule has been ambiguous. The submitter believes that this clarification needs to go further. For example, if a proposed boundary adjustment is not able to meet clauses SUB-S11(1)(b) or (c), the proposal shall be assessed as a Discretionary Activity pursuant to Rules SUB-R2(2), SUB-R7(2), SUB-R12(2), SUB-R16(2), SUB-R22(2) or SUB-R26(2) (zone dependent). However, if a proposed boundary adjustment is not able to meet clauses SUB-S11(1)(d) in the rural zones, does this now mean that it shall be assessed as a SUB-R29(2)? We believe, the application of this rule still remains ambiguous where non-compliances occur. Clarity needs to be provided about what rule an application shall be assessed against should one of the clauses in SUB-S11 are not able to be complied with.	Support the changes made to boundary adjustments, but with further clarity required.	Refer to section 3.8.2 and 3.8.3	
McKenzie & Co Consultants Limited	S_12	S_12_05	F_22	F_22_05	05. Boundary Adjustment Definition	SUB-S11(1)	Oppose	MCCL oppose the submission point in support of the proposed changes to SUB-S11(1). Their submission seeks further amendments for clarification purposes, regarding which rule framework would apply, and to improve clarity regarding the treatment of non-compliances. MCCL agree in principle, that the current amendments to SUB-S11(1) as notified, are not fit for purpose. They consider that they are not clear enough for Plan users to readily understand with confidence. However, MCCL consider the amendments proposed as part of our original submission (or similar) will help provide the required clarity and ensure the two rule frameworks (for boundary adjustment vs standard subdivison) are kept separate and not muddled together. The reasons for this are as per our original submission.		Refer to section 3.8.2 and 3.8.3	
McKenzie & Co Consultants Limited	S_12	S_12_05	F_22	F_22_04	05. Boundary Adjustment Definition	SUB-S11(1)	Support in part	MCCL support the submission point in support of the proposed new definition of boundary adjustment. However, MCCL seek further refinement of the new definition to refer to 'site' in place of 'allotments'. They state that the reasons for this are as per their original submission.		Refer to section 3.8.2 and 3.8.3	
Stratum Consultants Ltd	S_12	S_12_06			06. Site definition	Interpretation	Amend or support in part	The submitter supports the definition of "Site" to be amended to align with the National Planning Standards. However they note that as Plan Change 10 is already progressing amendments to improve consistency with the national framework, it is both logical and efficient to adopt the national definition in full. Partial or alternative wording undermines the purpose of standardisation and represents a missed opportunity to achieve alignment. Consistency across definitions is essential for clarity and efficient plan administration.	Amend the proposed definition of site to adopt the National Planning Standard definition of "Site" in full.	Refer to section 3.9.2 and 3.9.3	
McKenzie & Co Consultants Limited	S_12	S_12_06	F_22	F_22_07	06. Site definition	INterpretation	Support	MCCL support this submission point and agree with their reasons which generally align with the reasons in our original submission.		Refer to section 3.9.2 and 3.9.3	
Stratum Consultants Ltd	S_12	S_12_07			07. Industrial Definition	Interpretation	Support	The submitter supports defining "Industrial Activity" in accordance with the National Planning Standards noting that alignment will improve certainty for plan users and reduce interpretation disputes.	Retain definition as notified	Refer to section 3.10.2 and 3.10.3	
Stratum Consultants Ltd	S_12	S_12_08			08. Home-based Business Definition and Rules	RESZ-R20 & CCZ-R15	Support	The submitter supports the proposed definition and rule table amendments relating to Home Business activities. These changes appropriately recognise the scale and effects-based nature of such activities and reduce unnecessary consenting requirements for low-impact operations.	Retain definition and rules as notified.	Raefer to section 3.11.2 and 3.11.3	
Stratum Consultants Ltd	S_12	S_12_09			09. Reversing onto Rights of Way	APP1	Support	The submitter supports clarifying that rights-of-way may be used for manoeuvring. The submitter notes that this amendment reflects practical subdivision and access design realities and avoids inefficient land use outcomes.	Retain as notified	Refer to 3.12.2 and 3.12.3	
Stratum Consultants Ltd	S_12	S_12_10			10. Wireless Telecommunications Rule	SUB-S9(3)(C)(ii)	Support	The submitter supports the inclusion and updating of provisions relating to wireless telecommunications infrastructure within subdivision performance standard SUB-S9(3). Recognising the importance of digital connectivity and future-proofing infrastructure at the subdivision stage is appropriate and consistent with contemporary infrastructure planning practice.	Retain as notified	Refer to section 3.13.2 and 3.13.3	
McKenzie & Co Consultants Limited	S_12	S_12_10	F_22	F_22_10	10. Wireless Telecommunications Rule	SUB-S9(3)(C)(ii)	Support in part	MCCL support the submission point in support of the proposed changes to SUB-S9(3)(C)(i). However, MCCL seek further amendment as per the relief sought in our original submission.		Refer to section 3.13.2 and 3.13.3	
Rodney and Diane Petterson	S_13	S_13_01			11. Other	N/A	Oppose	Submitter raises a number of general concerns with Rotorua Lakes Council, including infill housing and consideration of externalities from development.	No specific relief sought	No specific relief sought	
James and Lisa Reweti	S_14	S_14_01			12. General support and opposition		Oppose	The submitter opposed Plan Change 10	Decline Plan Change 10.	Noted	

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Rotorua Regional Airport	S_15	S_15_01			11. Other		N/A	The submitter seeks PC10 to be expanded, to include updates to sections relevant to the Airport that are also out of date. In keeping with the intent of PC10, airport-related changes could be made for clarity and alignment, rather than changing any specific outcomes at this stage. Although outside the scope of PC10, RRA wishes to provide Council with advanced awareness of an upcoming change to the geometry of the Obstacle Limitation Surface 'OLS' as described in the District Plan. This change has arisen from a global International Civil Aviation Organisation (ICAO) initiative, and would remedy a significant safety issue whereby the existing OLS does not adequately protect our current and future flight procedures.	Examples of items relevant to RRA that should be updated include (but are not limited to): (a) A statement that "it is proposed to extend the existing sealed runway…to the South" which was completed many years ago. This statement has recently caused confusion for someone planning an extension to their property; (b) References to the Rotorua Eastern Arterial should be removed; (c) Dimensions provided for the grass runway are incorrect; (d) A reference is made to Advisory Circular AC139-06A, which became obsolete on 27th April 2007. It has now been superseded by AC139-6. (e) The standard required to be used for noise contour assessment is now obsolete and has changed to a newer method.	Reject as this is outside the scope of PC 10	
Chorus New Zealand Ltd	S_16	S_16_01			10. Wireless Telecommunications Rule	SUB S9(3)(C)	Amend or support in part	Chorus seeks amendments to ensure that open access fibre is required where it is reasonably practicable to install it at subdivision stage. Chorus submits that the proposed wording unintentionally enables developers to default to wireless solutions even where fibre installation is straightforward, efficient, and expected by consumers.	The submitter seeks the following amendments to SUB S9(3)(c): i. Adequate provision shall be made for the supply and installation of electricity, telecommunication (including ~~broadband capability~~ open-access fibre where reasonably practicable) and gas services (where available within 100m of the subdivision) for every site and building within the subdivision up to the frontage of the site, or lease area; ii.Electricity, ~~telecommunication,~~ open access fibre, and gas shall be installed underground unless that is demonstrated to be impractical, or telecommunication is to be provided by wireless technology where ~~underground services~~ connection to an open-access fibre network is not reasonably practicable;	Refer to section 3.13.2 and 3.13.3	
McKenzie & Co Consultants Limited	S_16	S_16_01	F_22	F_22_09	10. Wireless Telecommunications Rule	SUB S9(3)(C)	Oppose	MCCL generally support the submission point in principle, as it would apply to most serviced urban areas. However they oppose the relief sought, as it would still apply to rural areas that have no or varying forms of open access fibre. The relief sought includes wording that uses vague terminology ("not reasonably practicable"). They do not consider that wording is readily measurable to determine compliance for the reasons as per our original submission. They consider the rural areas require more certain telecommunication standards for the reasons as per our original submission.		Refer to section 3.13.2 and 3.13.3	
C H	S_17	S_17_01			12. General support and opposition	N/A	Oppose	The submitter opposes plan change 10 in its entirety stating that council is just blanket rolling all these terms with a definition to cover up why neighbouring properties to multi dwelling/tenanted/rental/boarded will be limited to feeling safe next to them because it gives an open invite with no restrictions to have anti-social housing being scattered through certain suburbs. They state that this will penalise the average home owner with many restrictions while the developers get the ok to do 10 compact builds to house 50+ ppl on an average sized section with no monetization and impacts the neighbouring properties. While their rates go up to cater to the new builds, infrastructure and leaving neighbouring properties in a mess.	The submitter requests no more changes to the district plan. Stop raising our rates. Raise the rates that apply to new builds. Make all the developers properties be as transparent as a normal ratepayer or homeowner. Let the public see what they pay for rates. Stop trying to allow the idea you can just cram everyone into the socio demograph where it suits the council to overlook the problems it causes just to get on the side of the government to vouch for vanity projects of our city and line your pockets. Changing definitions or labels and terminology is your form of being deceptive. If the Council really cared they would make it clear to the public what changes are being made and for what purpose, and how it would impact those affected.	Noted	
Hamiora Werahiko	S_18	S_18_01			03. Community Housing definition and provisions	Interpretation	Support	I support the updated definition as it provides a clearer pathway for non-typical residential arrangements.	Amendment sought: Ensure the definition explicitly includes "Papakāinga" or provides a cross-reference to ensure these developments are not inadvertently excluded from the "Community Housing" benefits.	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ara Poutama Aotearoa- Department of Corrections	S_18	S_18_01	F_24	F_24_08	03. Community Housing definition and provisions	Interpretation	Oppose in part/amend	The submitter supports providing clearer pathways for non-typical residential arrangements, however considers the exclusions in the community housing definition will not achieve that outcome and particularly in terms of increasing housing to meet the diverse range of housing needs within New Zealand communities. That includes the necessary accommodation and support provided by Ara Poutama and other agencies for people serving sentences or orders imposed by the courts and the New Zealand Parole Board within the community.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Hamiora Werahiko	S_18	S_18_02			08. Home-based Business Definition and Rules	RESZ-R20 & CCZ-R15	Support	I support moving performance standards into the rules to increase clarity. This supports entrepreneurship on Marae and Māori land.	The "Double-Hurdle": While these District Plan refinements help, Māori landowners still face the restrictive "Regional PC10" nutrient rules. Council should ensure that these District Plan changes work in harmony with regional rules to ensure that a "permitted" activity under one plan isn't made impossible by the other. Consultation: Council must ensure that these technical refinements do not inadvertently affect wāhi tapu or cultural sites through more "permissive" earthworks definitions. I seek that the Council continues to engage directly with Iwi authorities on the implementation of these definitions.	Noted	

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Hamiora Werahiko	S_18	S_18_03			11. Other		Support	Minor Household Uits - Support in Part - While I support the clarification, the rules should be as permissive as possible for Māori freehold land to support whānau returning to their ancestral lands without the barrier of expensive resource consents.	The "Double-Hurdle": While these District Plan refinements help, Māori landowners still face the restrictive "Regional PC10" nutrient rules. Council should ensure that these District Plan changes work in harmony with regional rules to ensure that a "permitted" activity under one plan isn't made impossible by the other. Consultation: Council must ensure that these technical refinements do not inadvertently affect wāhi tapu or cultural sites through more "permissive" earthworks definitions. I seek that the Council continues to engage directly with Iwi authorities on the implementation of these definitions.	Noted	
Hamiora Werahiko	S_18	S_18_04			05. Boundary Adjustment Definition	SUB-S11(1)	Support	I support the new definition and refined rules. This is vital for Māori trusts who need to adjust titles for practical use or to support whānau partitions.	The "Double-Hurdle": While these District Plan refinements help, Māori landowners still face the restrictive "Regional PC10" nutrient rules. Council should ensure that these District Plan changes work in harmony with regional rules to ensure that a "permitted" activity under one plan isn't made impossible by the other. Consultation: Council must ensure that these technical refinements do not inadvertently affect wāhi tapu or cultural sites through more "permissive" earthworks definitions. I seek that the Council continues to engage directly with Iwi authorities on the implementation of these definitions.	Noted	
Hamiora Werahiko	S_18	S_18_05			10. Wireless Telecommunications Rule	SUB S9(3)(C)	Support	Better digital infrastructure is a priority for rural Māori blocks and marae. The submitter supports the reduction of barriers for these installations.	The "Double-Hurdle": While these District Plan refinements help, Māori landowners still face the restrictive "Regional PC10" nutrient rules. Council should ensure that these District Plan changes work in harmony with regional rules to ensure that a "permitted" activity under one plan isn't made impossible by the other. Consultation: Council must ensure that these technical refinements do not inadvertently affect wāhi tapu or cultural sites through more "permissive" earthworks definitions. I seek that the Council continues to engage directly with Iwi authorities on the implementation of these definitions.	Noted	
New Zealand Defence Force	S_19	S_19_01			04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Oppose	The submitter notes that the Section 32 Report states that the City Centre Zone requires “more targeted and deliberate management of activity types” to protect long-term quality, safety, and functionality. However, the proposed plan change does not follow through on this intention. Aside from a new “catch-all” rule (CCZ-R17A) and changes to the activity status of CCZ-R1, there is little targeted management of specific activity types. As a result, the broader implications of the “catch-all” approach are not assessed, including its effects on activities that do not generate the adverse outcomes the plan seeks to manage. One such activity is NZDF’s temporary military training activities (TMTA), which would be inappropriately captured by the new rule. NZDF conducts TMTA nationwide to fulfil its statutory purpose under section 5 of the Defence Act 1990, maintain operational capacity, and support community well-being and safety. Importantly, many NZDF training activities conducted “off base” are comparable to those undertaken by other public service agencies such as Police, Fire and Emergency New Zealand, or Land Search and Rescue. Training in off-base environments is essential to achieving realistic,	Amend the plan change so that Rule CCZ-R1.1 remains a permitted activity and specific rules are introduced to address the issues that are of concern due to their adverse effects on the city centre. In the alternative, amend specific rules that may be inadvertently affected by this change including amendment of Rule TEMP-R2 to delete the exclusion of City Centre Zones so that temporary military training activities remain permitted in the City Centre 1 and 2 Zones. So that the changes directly relate to the outcomes sought, NZDF requests that the catch all Rule CCZ-R1.1 remain a permitted activity and specific rules are introduced to address those activities of concern as has been proposed through the introduction of Rules CCZ-R17A and CCZ-R17.3 relating to residential activities. This is vital to enable NZDF appropriate provision to undertake temporary military training activities (TMTA) which NZDF needs to be able to undertake to meet its statutory purposes and government expectations.	Refer to section 3.7.2 and 3.7.3	

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Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_19	S_19_01	F_28	F_28_33	04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Support	HUD supports this submission point opposing the use of a blanket discretionary default activity status in the City Centre where this approach is not supported by targeted, effects-based analysis. HUD considers the proposed changes are not supported by the s32 analysis and risk unintended consequences. HUD considers that broad discretionary mechanisms and catch-all rules, rather than clearly identifying and regulating specific activities of concern, creates unnecessary regulatory burden and uncertainty. This approach increases consenting costs and the likelihood of public notification without demonstrating that such outcomes are required to manage environmental effects. Drawing on HUD's experience with emergency housing resource consents in Rotorua, discretionary and non-complying pathways have resulted in significant regulatory friction, delay, and opposition unrelated to land-use effects. HUD is concerned that similar outcomes would arise under the proposed City Centre provisions, inhibiting the timely delivery of housing and other activities that support community wellbeing.	HUD supports submission points seeking a more targeted and proportionate approach that retains an enabling planning framework while addressing demonstrated effects.	Refer to section 3.7.2 and 3.7.3	
Hao Boutique Hotel Group	S_19	S_19_01	F_25	F_25_06	04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Support	HBHG support the relief sought to retain the existing default permitted activity status in CCZ. We support their submission points which align with and reiterate our concerns with the proposed changes to this default rule, as per our original submission. Their submission represents a clear example of the range of diverse activities/operations that will be unduly affected by such a far-reaching, blanket default rule change in the CCZ. Their alternative relief sought for necessary changes to the Temporary Activity rules for the CCZ to support their operations, reiterates our original submission points that the relationship between the CCZ provisions and all other provisions of the District Plan, including those for Temporary Activities in the CCZ, have not been fully understood and considered in the Section 32 report.	HBHG consider that the Temporary Activity rules and all other provisions of the District Plan require full evaluation, should any changes to the default permitted activity status in CCZ be pursued by Council.	Refer to section 3.7.2 and 3.7.3	
Georgina Dean	S_20	S_20_01			04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-RR1	Support	The submitter supports the plan change, specifically the removal of further urban design outcomes in the community housing - unless being linked to other matters of control where urban design and amenity outcomes are able to be used.	No specific relief sought	No specific relief sought	
Waikite Valley Community Collective	S_21	S_21_01			03. Community Housing definition and provisions	Interpretation	Amend or support in part	The submitter supports the elaboration of the exclusions within the community housing definition. Their concern is specific to the rural zone; having multiple people intensively living on one site in a rural zone may have an adverse effect on those who rely on the rural zone for their livelihood. This is contrary to the amenity and rural characteristics of the zone. The submitter requests that there needs to be improved clarity regarding exclusions related to Provision for Boarding Houses and other forms of Communal or Shared Housing within rural zones.	They request the following specific changes: 1. Maintain the current maximum criteria of 8 people living in one residence, specific to the rural zone within community housing provisions. 2. The provision for community housing be a "prohibited activity" for over 8 people including staff, in the rural zone 3. Improved clarity regarding exclusions related to provision for boarding houses and other forms of communal or shared housing within the rural zone; adopting the same exclusions as community housing, as stated here "This definition excludes facilities where residents are subject to legal orders that restrict their freedom of movement, such as custodial care, home detention, or probation-related accommodation.	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Hao Boutique Hotel Group	S_21	S_21_01	F_25	F_25_22	03. Community Housing definition and provisions	Interpretation	Support in part	The submitter supports the submission point with respect to their support of the exclusions within the community housing definition and their request that there needs to be improved clarity regarding exclusions for boarding houses and other forms of communal/shared housing within rural zones. They support their comments that having multiple people intensively living on one site in a rural zone may have an adverse effect on those who rely on the rural zone for their livelihood. The submitter notes that the Operative RURZ policy and rule framework already seeks to manage intensive activities of scale such as Community Housing exceeding 8 persons, by making such activities as non-complying activities. Such activities can have significant adverse effects on rural character and amenity, through reduced levels of open space, over intensification in housing development, increased traffic levels and artificial lighting. Such activities can also risk creating 'out of zone' development, and development that is unconnected with the rural economy.	A non-complying activity status should be retained as per the Operative plan. The submitter believes that a prohibited activity status does not follow an effects based approach and consider that a non-complying activity status still allows for the assessment of proposals on merit.	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	

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Ara Poutama Aotearoa- Department of Corrections	S_21	S_21_01	F_24	F_24_06	03. Community Housing definition and provisions	Intepretation	Oppose	Ara Poutama considers the exclusions in the community housing definition, and prohibited activity status for community housing in the rural zone: 1. Will significantly compromise the ability of Ara Poutama and other agencies to provide the necessary accommodation and support for people serving sentences or orders imposed by the courts and the New Zealand Parole Board within the community. 2. Are not based on environmental effects that can or should be addressed under the RMA. 3. Will fail to account for the diverse range of housing needs within New Zealand communities. 4. Will result in a planning outcome which discriminates between activities based on the circumstances of the residents rather than for sound resource management reasons.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
McKenzie & Co Consultants Limited	S_22	S_22_01			05. Boundary Adjustment Definition	SUB-S11(1)	Amend or support in part	McKenzie & Co Consultants Limited (MCCL) supports the intent of the proposed change, for the purpose of introducing a definition for boundary adjustment subdivision. They state that this will assist with removing any existing ambiguity caused by the lack of a definition. Having a definition is critical to facilitating consistent interpretation of such an activity by the community, Council and all plan users. However, MCCL seek amendment of the new NPS-derived definition to ensure its application is suited to and consistent with the existing regulatory framework and definitions of the ODP, by refraaming around "sites" rather than "allotments". MCCL explains that ODP subdivision and land use controls are framed around Sites, which are defined by records of title, rather than individual lots or parcels shown on survey plans. Using “allotments” risks confusion and unintended consequences, particularly where multiple lots are held under a single title. Amending the definition to focus on Sites would better align with existing ODP definitions, rules, and performance standards, and ensure the definition functions consistently within the current regulatory framework. MCCl also seek that SUB-S11 is updated , based on adopting the new definition for boundary adjustment. They seek changes that would remove duplication in wording and separate the performance elements of SUB-S11 from the 'definition' elements (now taken care of with the new definition).	Retain new boundary adjustment definition as proposed, but with amendment to include reference to ‘Sites’ in place of ‘allotments’. Amend SUB-S11 based on adopting a new definition for boundary adjustment: SUB-S11 1. *The subdivision standards for the zone shall not apply to boundary adjustment subdivision s. ~~undertaken for the adjustment of boundaries between adjoining lots. Subdivision undertaken for the purposes of a b B~~ oundary adjustment subdivisions shall comply with the following:* *~~a. No additional lots or lease areas for which a Computer Register (Certificate of Title) can be issued shall be created; and~~* *~~b.~~ a. The adjustment ~~or relocation~~ of boundaries shall leave the resulting Computer Register (Certificate of Title) with similar areas to that existing prior to subdivision; and* *~~c.~~ b. The adjustment ~~or relocation~~ of boundaries shall not increase the degree of non-compliance of any existing Computer Register (Certificate of Title) or lease area, with the site design performance standards contained in this part of the zone.* *~~d.~~ c. In rural zones, the adjustment ~~or relocation~~ of boundaries shall not result in lifestyle-sized lots (less than 4 hectares) for which there was not an allocation*	Refer to section 3.8.2 and 3.8.3	
McKenzie & Co Consultants Limited	S_22	S_22_02			05. Boundary Adjustment Definition	SUB-S11(1)	Oppose	MCCL oppose the proposed amendment to SUB-S11(1) relating to boundary adjustment subdivisions that create lifestyle-sized lots and seek deletion of the added wording. MCCL consider there is no planning basis for singling out non-compliance with SUB-S11(1)(d), as all SUB-S11(1) performance standards carry equal status and consequences. The Operative District Plan clearly establishes boundary adjustment subdivisions as a distinct subdivision pathway. Those meeting all standards are Controlled Activities, while those that do not are Discretionary Activities, with zone subdivision standards expressly excluded. Introducing additional assessment for boundary adjustments that result in lifestyle-sized lots would undermine this clear framework and improperly conflate boundary adjustment rules with other subdivision regimes. The submitter notes that boundary adjustment subdivisions are inherently different from other rural subdivisions, as they involve reciprocal exchanges of land between existing titles and do not create new development opportunities. Whether or not a lifestyle-sized lot results, such subdivisions remain boundary adjustments and should continue to be assessed under the same limited performance standards and discretionary framework already provided for in the ODP.	The submitter requests deletion of the added text to SUB-S11(1).	Refer to section 3.8.2 and 3.8.3	
McKenzie & Co Consultants Limited	S_22	S_22_03			06. Site definition	Interpretation	Support	The submitter supports the proposed new Site definition change, which involves technical updates of the ‘Computer Freehold Register’ term to ‘Record of Title’, as well as inclusion of reference to the Unit Titles Act 2010.	Retain as notified	Refer to section 3.9.2 and 3.9.3	
McKenzie & Co Consultants Limited	S_22	S_22_04			07. Industrial Definition	Interpretation	Support	The submitter supports the proposed new Industrial Activity definition update for consistency purposes.	Retain as notified	Refer to section 3.10.2 and 3.10.3	
McKenzie & Co Consultants Limited	S_22	S_22_05			09. Reversing onto Rights of Way	APP1	Support	The applicant supports the proposed change, to allow the reversing/turning of vehicles onto a right of way to be considered as compliant with the Turning Standards.	Retain as notified	Refer to 3.12.2 and 3.12.3	
Kāinga Ora – Homes and Communities	S_22	S_22_05	F_23	F_23_04	09. Reversing onto Rights of Way	APP1	Support	Kāinga Ora supports the changes to the turning standards through PC10. Noting that this allows the appropriate use of the ROW where sufficient reverse turning circles can be provided for and reduces vehicle manoeuvring on each private site.		Refer to 3.12.2 and 3.12.3	

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McKenzie & Co Consultants Limited	S_22	S_22_06			10. Wireless Telecommunications Rule	The submitter supports this+I5+I7:I10+G166	Amend or support in part	The submitter supports the intent of the proposed change, to allow for other wireless technologies to be provided, as per the discussion in the s32 Report. However MCCL consider that the change should make more explicit reference to clarify that wireless technology is an acceptable form of service for subdivisions in rural zones, regardless of whether there are underground services available or nearby. Otherwise, the use of the term 'not practicable' brings in a parameter that is not readily measurable to determine compliance. The submitter notes that it is commonplace that most rural sites do not have underground telecommunications services at their boundaries. Wireless has been an accepted servicing solution by RLC consenting officers and engineers for some time. Whether or not there has been underground telecommunications services available to a rural site, is typically of no consequence, as wireless remains a higher level of service, regardless.	Retain change to SUB-S9(3)(C)(ii) as proposed, but with amendment to add note to clarify that wireless is an acceptable form of telecommunications service: *Electricity, telecommunication, and ~~services~~ gas shall be installed underground unless that is demonstrated to be impractical, or telecommunication is to be provided by wireless technology where underground services is not practicable ; Note for subdivisions in rural zones – wireless technology is an acceptable form of service regardless of proximity of any underground services.*	Refer to section 3.13.2 and 3.13.3	
McKenzie & Co Consultants Limited	S_22	S_22_07			10. Wireless Telecommunications Rule	SUB S9(3)(C)	Amend or support in part	For similar reasons to the need to adapt the ODP servicing performance standards for telecommunications, there are now a greater range of power servicing options for subdivisions, that did not exist at the time the ODP was prepared. There are growing needs in the local rural community and across NZ, for the ability to provide more affordable power solutions for people to live on the land in rural areas. MCCL seeks that the Rotorua Operative District Plan's power serviceability requirements in SUB-S9(3)(C) are reviewed through PC 10, as they no longer reflect modern power technologies or current rural living needs. Advances in off-grid power systems now provide reliable and affordable alternatives to reticulated networks, particularly where distance and cost make traditional connections impractical in rural areas. MCCL also requests that the requirement for gas reticulation be evaluated, noting it is not generally an essential subdivision service and warrants reconsideration.	Re-evaluation of the suitability of the power servicing requirements under SUB-S9(3)(C) and inclusion of off grid solar systems as being an acceptable power service solution for subdivisions in rural zones (in certain instances). Re-evaluation of the references to Gas services under SUB-S9(3)(C).	Refer to section 3.13.2 and 3.13.3	
Kāinga Ora – Homes and Communities	S_23	S_23_01			05. Boundary Adjustment Definition	Interpretation	Support	The submitter supports the proposed definition of 'boundary adjustment'.	Retain the definition of 'boundary adjustment' as notified.	Refer to section 3.8.2 and 3.8.3	
McKenzie & Co Consultants Limited	S_23	S_23_01	F_22	F_22_06	05. Boundary Adjustment Definition	Interpretation	Support in part	MCCL support the submission point in support of the proposed new definition of boundary adjustment.	MCCL seek further refinement of the new definition to refer to 'site' in place of 'allotments'. The reasons for this are as per our original submission.	Refer to section 3.8.2 and 3.8.3	
Kāinga Ora – Homes and Communities	S_23	S_23_02			03. Community Housing definition and provisions	Interpretation	Oppose in part/amend	Planning definitions must remain effects-based rather than people-based. Therefore, Kāinga Ora oppose, in part, the new definition for Community Housing. Kāinga Ora opposes the proposed exclusions, as this distinction is not based on actual environmental effects. It is important to note that under the Resource Management Act ("RMA"), planning rules must relate to environmental effects, not the personal or legal status of occupants who may reside within community housing. Housing that accommodates people on home detention, probation, or other custodial orders do not inherently produce different environmental effects from other supported residential activities. The submitter notes that the proposal instead raises human rights concerns by creating a discriminatory planning distinction that targets individuals based on justice-system status rather than actual land-use outcomes. People subject to community-based sentences have the right to live in and be supported within the community, and planning definitions should remain effects-based rather than based on the legal status of a person.	Amend the definition of 'community housing' as follows: *a single place of residence located on a site where specialised care or support is provided to meet the social or physical needs of residents. ~~This definition excludes facilities where residents are subject to legal orders that restrict their freedom of movement, such as custodial care, home detention, or probation-related accommodation.~~*	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_23	S_23_02	F_28	F_28_13	03. Community Housing definition and provisions	Interpretation	Support	The submitter supports this submission point opposing people-based exclusions within the definition of "community housing," including exclusions based on legal or justice-system status.The submitter considers that planning definitions must remain effects-based and should not differentiate between housing activities based on the personal or legal circumstances of residents. Housing that accommodates people subject to community-based orders does not inherently generate different environmental effects from other forms of supported or community housing. The submitter is concerned that these exclusions introduce discriminatory planning distinctions that are not supported by the Resource Management Act and expose the District Plan to legal and human rights risk. HUD also notes the absence of locality-specific evidence demonstrating that supported or community housing generates adverse environmental effects that would justify more restrictive treatment. Further, the submitter considers that such provisions disproportionately affect vulnerable communities, including whānau Māori, and risk worsening housing insecurity by constraining the delivery of supported and community housing where it is most needed.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	

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Hao Boutique Hotel Group	S_23	S_23_02	F_25	F_25_12	03. Community Housing definition and provisions	Interpretation	Oppose	The submitter opposes the submission point to amend the definition of Community Housing as per their submission. HBHG support the proposed definition as notified for the reasons in Council's Section 32 Report. They note that the current Operative definition already excludes "facilities where the movement of residents is legally restricted". The Operative Plan is already clear in making this distinction. The proposed changes as notified will provide further clarity to an existing core component of the existing definition.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ara Poutama Aotearoa- Department of Corrections	S_23	S_23_02	F_24	F_24_09	03. Community Housing definition and provisions	Interpretation	Support	The submitter supports the submission on the basis that the exclusions in the community housing definition will result in a planning outcome which discriminates between activities based on the circumstances of the residents rather than for sound resource management reasons and is not based on environmental effects that can or should be addressed under the RMA.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Kāinga Ora – Homes and Communities	S_23	S_23_03			06. Site definition	Interpretation	Support	Kāinga Ora supports the amendments to the definition of 'site' changing all references of computer freehold register and certificate of title to "record of title"	Retain as notified	Refer to section 3.9.2 and 3.9.3	
McKenzie & Co Consultants Limited	S_23	S_23_03	F_22	F_22_08	06. Site definition	Interpretation	Support	MCCL support this submission point and agree with the reasons which generally align with the reasons in our original submission.		Refer to section 3.9.2 and 3.9.3	
Kāinga Ora – Homes and Communities	S_23	S_23_04			01. Tourist Accommodation Definition	Interpretation	Support	Kāinga Ora supports the amendments to the definition of 'visitor accommodation', noting that this is in line with the National Planning Standards.	Retain the definition of 'visitor accommodation', as notified.	Refer to sections 3.2.2 and 3.2.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_23	S_23_04	F_28	F_28_02	01. Tourist Accommodation Definition	Interpretation	Oppose in part/amend	The submiiter is concerned that replacing "Tourist Accommodation" with "Visitor Accommodation" effectively reclassifies motels and boarding houses used for emergency housing as residential activities. This shift is then used to justify more restrictive activity statuses—such as discretionary or non-complying—under residential rules, without evidence that emergency or supported housing generates greater environmental effects than other accommodation types. The submission notes that the Section 32 Report acknowledges the subjective judgement required when applying the visitor accommodation definition, yet the proposed provisions increase regulatory complexity, consenting triggers, and the likelihood of public notification. Based on recent experience in Rotorua, the submitter states that this approach leads to regulatory delay, uncertainty, and reduced responsiveness to urgent housing need. Overall, HUD considers PC10 creates an imbalance by enabling and clarifying visitor accommodation while exposing emergency and supported housing to higher regulatory thresholds without locality-specific justification. This risks constraining the Government's ability to deliver timely housing support to vulnerable households and is inconsistent with national direction to enable housing supply and access.	The submitter considers that alternative mechanisms, such as performance standards, should be explored instead.	Refer to sections 3.2.2 and 3.2.3	
Hao Boutique Hotel Group	S_23	S_23_04	F_25	F_25_03	01. Tourist Accommodation Definition	Interpretation	Support in part	The submitter supports the submission point to update the new Visitor Accommodation definition as proposed.	The submitters request that further clarity is added to the new definition in relation to 'ancillary activities'.	Refer to sections 3.2.2 and 3.2.3	
Kāinga Ora – Homes and Communities	S_23	S_23_05			02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-07; RESZ-O14; RESZ-O17	Oppose	Kāinga Ora opposes the inclusion of "public safety" in objectives RESZ-07; RESZ-O14; RESZ-O17 as it shifts the focus away from environmental effects and into matters relating to the perceived characteristics or legal status of occupants, which are not Resource Management Act considerations. Public safety concerns relating to individuals subject to custodial or community-based orders are justice-system matters, not environmental effects and including them invites discriminatory decision-making based on who lives or may live in community housing rather than how the activity functions. This risks introducing human-rights implications into a District Plan provision that should remain effects-based. Therefore, Kāinga Ora seeks that the reference to public safety in objectives RESZ-07; RESZ-O14; RESZ-O17 be deleted.	Delete reference to 'public safety' in RESZ-07; RESZ-O14; RESZ-O17, retaining the wording as currently operative.	Refer to section 3.6.2 and 3.6.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_23	S_23_05	F_28	F_28_05	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-O7, RESZ-O14, RESZ-O17	Support	The submitter considers that introducing "public safety" shifts the focus of the District Plan away from effects-based resource management and into matters relating to the perceived characteristics or legal status of occupants. They note that these are not matters that can be reliably assessed through land-use planning provisions and are more appropriately addressed through other regulatory and social service systems. The submitter is concerned that the inclusion of "public safety" in these objectives creates legal risk, including the risk that the provisions are ultra vires under the Resource Management Act. It also introduces a high degree of subjectivity and inconsistency into decision-making, as there is no clear or objective mechanism for assessing public safety outcomes through a resource consent process. Further, the submitter considers that these provisions raise human rights and discrimination concerns, particularly where housing activities may be treated differently based on who lives there, rather than how the activity functions or the environmental effects it generates.	The submitter supports the submission points seeking deletion of "public safety" references in residential objectives to retain an effects-based, lawful, and certain planning framework.	Refer to section 3.6.2 and 3.6.3	

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Hao Boutique Hotel Group	S_23	S_23_05	F_25	F_25_10	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-O7, RESZ-O14, RESZ-O17	Support	The submitter supports the submission point to remove references to 'public safety' in the objectives and policies. We generally agree with their supporting comments. HBHG consider that the Operative objectives and policies already address public safety matters through various policies and assessment criteria that seek outcomes for attractive and safe streets and public open spaces, and passive surveillance, eg. RESZ-P3 and assessment criteria CCZ-MC1 and CCZ-MDA.		Refer to section 3.6.2 and 3.6.3	
Ara Poutama Aotearoa- Department of Corrections	S_23	S_23_05	F_24	F_24_10	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-O7, RESZ-O14, RESZ-O17	Support	The submitter supports the submission on the basis that the inclusion of "public safety" into the residential objectives will result in a planning outcome which discriminates between activities based on the circumstances of the residents rather than for sound resource management reasons and is not based on environmental effects that can or should be addressed under the RMA.		Refer to section 3.6.2 and 3.6.3	
Kāinga Ora – Homes and Communities	S_23	S_23_06			02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-R8A	Oppose	Kāinga Ora opposes the addition of this rule as there is a concern that this could include a range of activities that are residential in nature and should therefore be permitted within the residential zones. Kāinga Ora seek that those activities that Council wish to restrict be specifically included as activities with accompanying definitions.	Delete RESZ-R8A.	Refer to section 3.3.2 and 3.3.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_23	S_23_06	F_28	F_28_08	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-R8A	Support	The submitter agrees that the introduction of Rule RESZ-R8A creates a risk that residential activities which are otherwise anticipated within residential zones are captured as discretionary activities, despite not generating adverse environmental effects. HUD considers that defaulting unspecified residential activities to discretionary status undermines housing supply and responsiveness, particularly for non-standard or supported housing models. This approach increases consenting costs and delays and is inconsistent with an effects-based planning framework.	The submitter supports deletion of RESZ-R8A to maintain certainty and ensure that residential zones continue to function as enabling environments for housing for all people, as required by the NPS-UD.	Refer to section 3.3.2 and 3.3.3	
Ara Poutama Aotearoa- Department of Corrections	S_23	S_23_06	F_24	F_24_11	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-R8A	Support	The submitter supports the submission on the basis that Discretionary status for "Other Residential Activities not expressly provided for" would not support the increased supply of housing to meet the diverse needs of communities, and a Discretionary activity status is not justified by reference to any environmental effects resulting from the Other Residential Activities.		Refer to section 3.3.2 and 3.3.3	
Kāinga Ora – Homes and Communities	S_23	S_23_07			03. Community Housing definition and provisions	RESZ-R9	Support	Kāinga Ora supports the inclusion of a threshold of 8 people residing on the site for a permitted community housing activity within the rule.	Retain as notified	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_23	S_23_07	F_28	F_28_15	03. Community Housing definition and provisions	RESZ-R9	Support	The submitter supports this submission point. HUD considers that permitting community housing for up to eight people within residential zones provides an appropriate baseline that recognises community housing as residential in nature. HUD supports this approach as it maintains certainty and avoids unnecessary consenting barriers for smaller-scale community housing that does not generate adverse environmental effects beyond those of ordinary residential activities.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Kāinga Ora – Homes and Communities	S_23	S_23_08			03. Community Housing definition and provisions	RESZ-R9	Oppose	Kāinga Ora considers that a Restricted Discretionary Activity status with appropriate assessment criteria within RESZ-AC1 is more appropriate for assessing community housing for more than 8 people residing on the site.	Amend to have the activity status as Restricted Discretionary.	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_23	S_23_08	F_28	F_28_16	03. Community Housing definition and provisions	RESZ-R9	Support	HUD supports this submission point. HUD agrees that a restricted discretionary activity status is more appropriate than a discretionary or non-complying status for community housing exceeding eight people. HUD considers that a restricted discretionary framework enables effects-based assessment while avoiding disproportionate consenting burden and uncertainty that could inhibit the delivery of supported housing.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ara Poutama Aotearoa- Department of Corrections	S_23	S_23_08	F_24	F_24_12	03. Community Housing definition and provisions	RESZ-R9	Support	Ara Poutama supports the submission on the basis that a Restricted Discretionary status with appropriate assessment criteria is more efficient and will ensure that any effects resulting from the exceedance in persons on site can be assessed.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Kāinga Ora – Homes and Communities	S_23	S_23_09			03. Community Housing definition and provisions	COMZ-R24	Oppose	Kāinga Ora oppose limiting the number of persons that reside within community housing within the Commercial Zones as the zone is suitable to accommodate a larger number of persons within such accommodation given the character of the zone. Further, the activity would have similar effects to other activities permitted within the zone.	Amend the rule as follows: Community housing Activity Status: Permitted ~~*Where:*~~ ~~*A maximum of 8 persons (including resident staff) reside on site.*~~	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_23	S_23_09	F_28	F_28_17	03. Community Housing definition and provisions	COMZ-R24	Support	HUD supports this submission point. HUD considers that commercial zones are well suited to accommodate community housing, given access to services, infrastructure, and transport. HUD opposes limiting occupancy numbers or defaulting community housing to more restrictive activity statuses in commercial zones where there is no evidence of adverse environmental effects. HUD supports deletion or amendment of COMZ-R24 to retain a more enabling, effects-based approach.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Kāinga Ora – Homes and Communities	S_23	S_23_10			03. Community Housing definition and provisions	COMZ-R24	Oppose	Consequential to submission point S_23_09, Kāinga Ora seek this rule is deleted.	Delete the proposed rule	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Kāinga Ora – Homes and Communities	S_23	S_23_11			03. Community Housing definition and provisions	CCZ-R17	Oppose	Kāinga Ora oppose limiting the number of persons that reside within community housing within the City Centre Zone as the zone is suitable to accommodate a larger number of persons within such accommodation given the character of the zone and location to amenities. Further, the activity would have similar effects to other activities permitted within the zone.	Amend the rule as follows: Community housing Activity Status: Permitted ~~*Where:*~~ ~~*A maximum of 8 persons (including resident staff) reside on site.*~~	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	

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Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_23	S_23_11	F_28	F_28_19	03. Community Housing definition and provisions	CCZ-R17	Support	HUD agrees that limiting the number of persons who may reside within community housing in the City Centre Zone, and defaulting community housing to a more restrictive activity status, is not supported by evidence of adverse environmental effects. HUD considers that the City Centre Zone is specifically intended to accommodate higher-intensity activities and residential uses, given its access to services, transport, and infrastructure. Community housing in this location is residential in nature and does not, by virtue of resident numbers alone, generate effects that are materially different from other residential, or accommodation activities anticipated within the zone. HUD notes that the Section 32 analysis does not demonstrate that community housing in the City Centre produces adverse effects that justify more restrictive regulation than other permitted or anticipated activities. HUD is concerned that imposing occupancy limits or heightened activity statuses increases consenting cost, delay, and uncertainty, which can inhibit the timely provision of supported housing without achieving improved environmental outcomes.	HUD supports amending CCZ-R17 to retain a more enabling, effects-based approach to community housing within the City Centre Zone.	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Hao Boutique Hotel Group	S_23	S_23_11	F_25	F_25_13	03. Community Housing definition and provisions	CCZ-R17	Oppose	HBHG oppose their submission point to remove the proposed amendment to Rule CCZ-R17 as notified. HBHG support the reasons for this in Council's Section 32 Report in principle. Additionally, whilst we acknowledge that the city centre is typically well suited to higher intensity activities, we note that Council have identified issues of concern with the effectiveness of the existing Community Housing provisions in being able to deal with the range of potential environmental, social and economic effects from such activities in the Rotorua city centre. The effects, from such activities of unlimited scale, including their cumulative impacts, have the potential to detract from and work counter to the strong vibrancy and vitality outcomes sought for the CCZ by the Operative CCZ policy framework.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Kāinga Ora – Homes and Communities	S_23	S_23_12			03. Community Housing definition and provisions	CCZ-R17	Oppose	Consequential to submission point S_23_11, Kāinga Ora seek this rule is deleted.	Delete the proposed rule	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_23	S_23_12	F_28	F_28_21	03. Community Housing definition and provisions	RURZ_R17	Support	HUD supports this submission point. HUD agrees that providing for community housing accommodating up to eight people as a permitted activity within the Rural Zone appropriately recognises community housing as residential in nature and provides clarity and certainty for smaller-scale supported housing. HUD considers that a permitted activity threshold at this scale is consistent with an effects-based planning framework, as community housing of this size does not, of itself, generate adverse environmental effects that would justify resource consent. HUD supports retaining RURZ-R17 as notified, as it avoids unnecessary regulatory barriers while still allowing larger-scale proposals to be assessed where scale or intensity increases.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_23	S_23_12	F_28	F_28_20	03. Community Housing definition and provisions	CCZ-R17	Support	HUD supports this submission point. HUD agrees that limiting the number of persons who may reside within community housing in the City Centre Zone, and defaulting community housing to a more restrictive activity status, is not supported by evidence of adverse environmental effects. HUD considers that the City Centre Zone is specifically intended to accommodate higher-intensity activities and residential uses, given its access to services, transport, and infrastructure. Community housing in this location is residential in nature and does not, by virtue of resident numbers alone, generate effects that are materially different from other residential, or accommodation activities anticipated within the zone. HUD notes that the Section 32 analysis does not demonstrate that community housing in the City Centre produces adverse effects that justify more restrictive regulation than other permitted or anticipated activities. HUD is concerned that imposing occupancy limits or heightened activity statuses increases consenting cost, delay, and uncertainty, which can inhibit the timely provision of supported housing without achieving improved environmental outcomes.	HUD supports amending CCZ-R17 to retain a more enabling, effects-based approach to community housing within the City Centre Zone.	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_23	S_23_12	F_28	F_28_18	03. Community Housing definition and provisions	CCZ-R17	Support	HUD supports this submission point. HUD considers that commercial zones are well suited to accommodate community housing, given access to services, infrastructure, and transport. HUD opposes limiting occupancy numbers or defaulting community housing to more restrictive activity statuses in commercial zones where there is no evidence of adverse environmental effects.	HUD supports deletion or amendment of COMZ-R24 to retain a more enabling, effects-based approach.	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Hao Boutique Hotel Group	S_23	S_23_12	F_25	F_25_14	03. Community Housing definition and provisions	RURZ-R17	Support	HBHG support their submission point to retain the proposed amendment to Rule RURZ-R17(1) as notified. HBHG support the reasons for this in Council's Section 32 Report in principle.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Kāinga Ora – Homes and Communities	S_23	S_23_13			03. Community Housing definition and provisions	RURZ-R17	Support	Kāinga Ora supports the inclusion of a threshold of 8 people residing on the site for a permitted community housing activity within the rule.	Retain as notified	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Kāinga Ora – Homes and Communities	S_23	S_23_14			03. Community Housing definition and provisions	RURZ-R17	Oppose	Kāinga Ora considers that a Restricted Discretionary Activity status with appropriate assessment criteria in RESZ-AC1 is more appropriate for assessing community housing for more than 8 people residing on the site.	Amend to have the activity status as Restricted Discretionary.	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	

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Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_23	S_23_14	F_28	F_28_22	03. Community Housing definition and provisions	RURZ-R17	Support	HUD agrees that applying a Discretionary activity status to community housing accommodating more than eight people in the Rural Zone is not supported by evidence of adverse environmental effects and imposes a disproportionate regulatory burden. HUD considers that community housing is residential in nature and that an increase in resident numbers does not, of itself, justify full discretionary status. HUD notes that the Section 32 analysis does not demonstrate that community housing at this scale generates effects materially different from other residential activities anticipated within the Rural Zone. HUD supports a Restricted Discretionary activity status with appropriate assessment criteria as a more proportionate and effects-based approach. This enables consideration of relevant effects where scale increases, while avoiding unnecessary consenting cost, delay, and uncertainty that would arise from a full discretionary pathway and could inhibit the delivery of supported housing.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Hao Boutique Hotel Group	S_23	S_23_14	F_25	F_25_15	03. Community Housing definition and provisions	RURZ-R17	Oppose	HBHG oppose their submission point of having a restricted discretionary activity status instead of discretionary for Community Housing in the RURZ as notified. We consider that it would be a confusing outcome to allow and prioritise such activities of scale as being more anticipated in the rural areas than Visitor/Tourist Accommodation activities which are provided for as a discretionary activity. The Operative RURZ policy framework recognises that the rural zones allow a broad range of activities to take place and specifically recognises that tourist attractions and tourist accommodation are provided for in that mix. Introducing lesser activity statuses for other activities like Community Housing, would create confusing expectations on the treatment of activities such as Visitor/Tourist Accommodation that will remain regulated and anticipated by the Operative RURZ framework. HBHG note that Community Housing exceeding 8 persons, is already a non-complying activity under the Operative RURZ framework. Such activities can have significant adverse effects on rural character and amenity, through reduced levels of open space, over intensification in housing development, increased traffic levels and artificial lighting. Such activities can also risk creating 'out of zone' development, and development that is unconnected with the rural economy. A non-complying activity status should therefore be retained as per the Operative plan.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ara Poutama Aotearoa- Department of Corrections	S_23	S_23_14	F_24	F_24_13	03. Community Housing definition and provisions	RURZ-R17	Support	Ara Poutama supports the submission on the basis that a Restricted Discretionary status with appropriate assessment criteria is more efficient and will ensure that any effects resulting from the exceedance in persons on site can be assessed.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ara Poutama Aotearoa- Department of Corrections	S_24	S_24_01			03. Community Housing definition and provisions	Interpretation	Oppose in part/amend	The reasons for Ara Poutama's submission on the proposed new definition of "community housing" are included in the covering letter. In summary the submitter notes that the new definition of "community housing" proposed through PC10: 1. Will significantly compromise the ability of Ara Poutama and other agencies to provide the necessary accommodation and support for people serving sentences or orders imposed by the courts and the New Zealand Parole Board within the community. 2. Are not based on environmental effects that can or should be addressed under the RMA. 3. Fail to account for the diverse range of housing needs within New Zealand communities. 4. Result in a planning outcome which discriminates between activities based on the circumstances of the residents rather than for sound resource management reasons	Amend the proposed PC10 definition of "community housing" as follows: *community housing: a single place of residence located on a site where specialised care or support is provided to meet the social or physical needs of residents. ~~This definition excludes facilities where residents are subject to legal orders that restrict their freedom of movement, such as custodial care, home detention, or probation-related accommodation.~~* Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing".	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_24	S_24_01	F_28	F_28_14	03. Community Housing definition and provisions	Interpretation	Support	HUD supports this submission point opposing people-based exclusions within the definition of "community housing," including exclusions based on legal or justice-system status. HUD considers that planning definitions must remain effects-based and should not differentiate between housing activities based on the personal or legal circumstances of residents. Housing that accommodates people subject to community-based orders does not inherently generate different environmental effects from other forms of supported or community housing. HUD is concerned that these exclusions introduce discriminatory planning distinctions that are not supported by the Resource Management Act and expose the District Plan to legal and human rights risk. HUD also notes the absence of locality-specific evidence demonstrating that supported or community housing generates adverse environmental effects that would justify more restrictive treatment. Further, HUD considers that such provisions disproportionately affect vulnerable communities, including whānau Māori, and risk worsening housing insecurity by constraining the delivery of supported and community housing where it is most needed.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	

Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter	Recommended Decision	
Ara Poutama Aotearoa- Department of Corrections	S_24	S_24_02			02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-O7, RESZ-O14, RESZ-O17	Oppose	The submitter does not agree that "community housing" should be described as a "non-residential" activity. As outlined in their submission, the supported housing that Ara Poutama and other service providers manage share the same characteristics as a normal domestic residence, and does not generate environmental effects that are different to a normal domestic residence. For that reason, Ara Poutama considers that "community housing" should fall within the category of residential activities under the District Plan. Additonally the submitter does not support the addition of "public safety" to the objectives relating to non-residential activities in Residential zones.	1. Delete the proposed PC10 amendments to include "public safety" in RESZ-O7, RESZ-O14 and RESZ-O17 as follows: *Non-residential activities in residential zones that are domestic in scale and character and do not have an adverse impact on the amenity values and character, ~~and public safety~~ of the residential zones, or the vitality and viability of the City Centre or Commercial zones.* 2. Any additional or alternative relief which addresses Ara Poutama's concerns outlined in this submission.	Refer to section 3.3.2 and 3.3.3	
TE Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_24	S_24_02	F_28	F_28_06	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-O7, RESZ-O14, RESZ-O17	Support	The submitter considers that introducing "public safety" shifts the focus of the District Plan away from effects-based resource management and into matters relating to the perceived characteristics or legal status of occupants. These are not matters that can be reliably assessed through land-use planning provisions and are more appropriately addressed through other regulatory and social service systems. The submitter is concerned that the inclusion of "public safety" in these objectives creates legal risk, including the risk that the provisions are ultra vires under the Resource Management Act. It also introduces a high degree of subjectivity and inconsistency into decision-making, as there is no clear or objective mechanism for assessing public safety outcomes through a resource consent process. Further, the submitter considers that these provisions raise human rights and discrimination concerns, particularly where housing activities may be treated differently based on who lives there, rather than how the activity functions or the environmental effects it generates.	The submitter supports the submission points seeking deletion of "public safety" references in residential objectives to retain an effects-based, lawful, and certain planning framework.	Refer to section 3.3.2 and 3.3.3	
Ara Poutama Aotearoa- Department of Corrections	S_24	S_24_03			02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-R8A	Oppose	Residential activities in Residential zones should be permitted activities. Ara Poutama is concerned that the proposed inclusion of a generic category of "Other Residential Activities not expressly provided for" could result in residential activities that are not specifically captured by a Plan definition being classified as a Discretionary activity. That outcome would not support the increased supply of housing to meet the diverse needs of communities and a Discretionary activity status is not justified by reference to any environmental effects resulting from the Other Residential Activities.	1. Delete RESZ-R8A. 2. Alternatively, classify "Other Residential Activities not expressly provided for" as a permitted activity. 3. Any additional or alternative relief which addresses Ara Poutama's concerns outlined in this submission.	Refer to section 3.3.2 and 3.3.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_24	S_24_03	F_28	F_28_09	02. provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-R8A	Support	The submitter agrees that residential activities within residential zones should generally be permitted unless there is clear evidence of adverse environmental effects requiring regulation. HUD considers that the proposed category of "other residential activities not expressly provided for" is overly broad and risks capturing legitimate residential activities that are consistent with the character and amenity of residential zones. Defaulting such activities to discretionary status is not justified on an effects-based basis and may unnecessarily constrain housing delivery.	The submitter supports deletion of RESZ-R8A to avoid unintended regulatory consequences and to preserve clarity and certainty within residential zones.	Refer to section 3.3.2 and 3.3.3	
Ara Poutama Aotearoa- Department of Corrections	S_24	S_24_04			03. Community Housing definition and provisions	RESZ-R9(1)	Neutral	Ara Poutama is neutral in respect of the proposed inclusion of a permitted activity standard for community housing which limits the number of people that may reside on site to 8 persons (including resident staff).	1. Retain proposed changes to RESZ-R9(1) as notified. 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing".	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_24	S_24_04	F_28	F_28_24	03. Community Housing definition and provisions	RESZ-R9(1)	Support	HUD supports this submission point and retaining permitted activity standards for community housing up to eight people across zones, as these provisions appropriately recognise community housing as residential in nature and avoid unnecessary regulatory burden.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ara Poutama Aotearoa- Department of Corrections	S_24	S_24_05			03. Community Housing definition and provisions	RESZ-R9(3)	Oppose	Ara Poutama does not support the proposed Discretionary activity status for community housing with more than 8 people on the site. Ara Poutama considers that a Restricted Discretionary status with appropriate assessment criteria is more efficient and will ensure that any effects resulting from the exceedance in persons on site can be assessed.	1. Amend the activity status to Restricted Discretionary for RESZ-R9(3). 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing".	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_24	S_24_05	F_28	F_28_25	03. Community Housing definition and provisions	RESZ-R9(3)	Support	HUD supports these submission points. HUD considers that default discretionary activity status for community housing exceeding eight people imposes disproportionate regulatory burden and increases notification risk without evidence of greater environmental effects. HUD supports a restricted discretionary activity status as a more proportionate and effects-based mechanism.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ara Poutama Aotearoa- Department of Corrections	S_24	S_24_06			03. Community Housing definition and provisions	COMZ-R24(1)	Neutral	Ara Poutama is neutral in respect of the proposed inclusion of a permitted activity standard for community housing which limits the number of people that may reside on site to 8 persons (including resident staff).	1. Retain proposed changes to COMZ-R24(1) as notified. 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing".	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_24	S_24_06	F_28	F_28_26	03. Community Housing definition and provisions	COMZ-R24(1)	Support	HUD supports this submission point and retaining permitted activity standards for community housing up to eight people across zones, as these provisions appropriately recognise community housing as residential in nature and avoid unnecessary regulatory burden.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	

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Ara Poutama Aotearoa- Department of Corrections	S_24	S_24_07			03. Community Housing definition and provisions	COMZ-R24(3B)	Oppose	Ara Poutama does not support the proposed Discretionary activity status for community housing with more than 8 people on the site. Ara Poutama considers that a Restricted Discretionary status with appropriate assessment criteria is more efficient and will ensure that any effects resulting from the exceedance in persons on site can be assessed.	1. Amend the activity status to Restricted Discretionary for COMZ-R24(3B). 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing".	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_24	S_24_07	F_28	F_28_27	03. Community Housing definition and provisions	COMZ-R24(3B)	Support	HUD agrees that applying a Discretionary activity status to community housing accommodating more than eight people in the Commercial Zone is not supported by evidence of adverse environmental effects and imposes a disproportionate regulatory burden. HUD considers that commercial zones are generally well suited to accommodate higher-intensity residential and accommodation activities, given their access to services, transport, and infrastructure. An increase in the number of residents within community housing does not, of itself, justify full discretionary status in this zone, particularly where the Section 32 analysis does not demonstrate effects materially different from other permitted or anticipated activities. HUD is concerned that a Discretionary activity pathway increases consenting cost, delay, and the likelihood of public notification, which has been shown through recent Rotorua experience to create regulatory friction and opposition unrelated to land-use effects.	HUD supports a Restricted Discretionary activity status as a more proportionate and effects-based approach that enables relevant matters to be assessed without unnecessarily constraining the delivery of supported housing.	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ara Poutama Aotearoa- Department of Corrections	S_24	S_24_08			02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	COMZ-R33A	Oppose	Residential activities are permitted in the Commercial zones. Ara Poutama is concerned that the proposed inclusion of a generic category of "Other Residential Activities not expressly provided for" could result in residential activities that are not specifically captured by a Plan definition being classified as a Discretionary activity. That outcome would not support the increased supply of housing to meet the diverse needs of communities and a Discretionary activity status is not justified by reference to any environmental effects resulting from the Other Residential Activities.	1. Delete COMZ-R33A. 2. Alternatively, classify "Other Residential Activities not expressly provided for" as a permitted activity. 3. Any additional or alternative relief which addresses Ara Poutama's concerns outlined in this submission.	Refer to section 3.3.2 and 3.3.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_24	S_24_08	F_28	F_28_10	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	COMZ-R33A	Support	The submitter considers that residential activities are an anticipated and appropriate component of commercial zones and do not inherently generate adverse environmental effects that warrant default discretionary activity status. The submitter is concerned that COMZ-R33A introduces a generic catch-all provision that may inadvertently capture residential activities that would otherwise be appropriate within the commercial zone context. This increases regulatory uncertainty and may inhibit the provision of supported or community housing in locations well served by services and infrastructure.	The submitter supports deletion of COMZ-R33A to maintain an enabling, effects-based planning framework.	Refer to section 3.3.2 and 3.3.3	
Ara Poutama Aotearoa- Department of Corrections	S_24	S_24_09			02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	COMZ-R17A	Oppose	Residential activities are permitted in the City Centre zones. Ara Poutama is concerned that the proposed inclusion of a generic category of "Other Residential Activities not expressly provided for" could result in residential activities that are not specifically captured by a Plan definition being classified as a Discretionary activity. That outcome would not support the increased supply of housing to meet the diverse needs of communities and a Discretionary activity status is not justified by reference to any environmental effects resulting from the Other Residential Activities.	1. Delete CCZ-R17A. 2. Alternatively, classify "Other Residential Activities not expressly provided for" as a permitted activity. 3. Any additional or alternative relief which addresses Ara Poutama's concerns outlined in this submission.	Refer to section 3.3.2 and 3.3.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_24	S_24_09	F_28	F_28_11	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	COMZ-R17A	Support	The submitter considers that residential activities within the City Centre should not be subject to a generic discretionary catch-all rule unless there is clear evidence that such activities generate adverse effects requiring that level of control. The submitter is concerned that CCZ-R17A reduces certainty, increases consenting and notification risk, and may capture residential activities that are otherwise compatible with the City Centre environment. This approach relies on discretion rather than targeted regulation and risks undermining housing supply and responsiveness.	The submitter supports deletion of CCZ-R17A or, alternatively, a more targeted and effects-based approach.	Refer to section 3.3.2 and 3.3.3	
Hao Boutique Hotel Group	S_24	S_24_09	F_25	F_25_11	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	COMZ-R17A	Oppose	The submitter opposes the submission point to delete new Rule CCZ-R17A. The submitter supports the proposed new rule for the reasons in Council's Section 32 Report.		Refer to section 3.3.2 and 3.3.3	
Ara Poutama Aotearoa- Department of Corrections	S_24	S_24_10			03. Community Housing definition and provisions	CCZ-R17(1)	Neutral	Ara Poutama is neutral in respect of the proposed inclusion of a permitted activity standard for community housing which limits the number of people that may reside on site to 8 persons (including resident staff).	1. Retain proposed changes to CCZ-R17(1) as notified. 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing".	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_24	S_24_10	F_28	F_28_28	03. Community Housing definition and provisions	CCZ-R17(1)	Support	HUD supports this submission point and retaining permitted activity standards for community housing up to eight people across zones, as these provisions appropriately recognise community housing as residential in nature and avoid unnecessary regulatory burden.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Hao Boutique Hotel Group	S_24	S_24_10	F_25	F_25_16	03. Community Housing definition and provisions	CCZ-R17(1)	Support in part	HBHG support their neutral position and relief sought with respect to retention of new Rule CCZ-R17A. HBHG support the proposed new rule for the reasons in Council's Section 32 Report.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ara Poutama Aotearoa- Department of Corrections	S_24	S_24_11			03. Community Housing definition and provisions	CCZ-R17(3)	Oppose	Ara Poutama does not support the proposed Discretionary activity status for community housing with more than 8 people on the site. Ara Poutama considers that a Restricted Discretionary status with appropriate assessment criteria is more efficient and will ensure that any effects resulting from the exceedance in persons on site can be assessed.	1. Amend to have the activity status as Restricted Discretionary for CCZ-R17(3). 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing".	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	

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Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_24	S_24_11	F_28	F_28_29	03. Community Housing definition and provisions	CCZ-R17(3)	Support	HUD supports this submission point. HUD agrees that applying a Discretionary activity status to community housing accommodating more than eight people in the City Centre Zone is not supported by evidence of adverse environmental effects and imposes a disproportionate regulatory burden. HUD considers that community housing is residential in nature and that an increase in the number of residents does not, of itself, justify full discretionary status in a zone that is specifically intended to accommodate a wide range of activities at higher intensity. HUD notes that the Section 32 analysis does not demonstrate that community housing at this scale results in effects materially different from other residential or accommodation activities permitted or anticipated within the City Centre. HUD is concerned that a Discretionary activity status significantly increases consenting cost, delay, and the likelihood of public notification, which has been shown through recent Rotorua experience to amplify opposition unrelated to land-use effects.	HUD supports a Restricted Discretionary activity status as a more proportionate, effects-based approach that enables relevant matters to be assessed without creating unnecessary regulatory friction or undermining the delivery of supported housing.	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Hao Boutique Hotel Group	S_24	S_24_11	F_25	F_25_17	03. Community Housing definition and provisions	CCZ-R17(3)	Oppose	HBHG oppose their submission point regarding amendment to the activity status for Community Housing in Rule CCZ-R17(3). HBHG support the changes as notified for the reasons in Council's Section 32 Report. Additionally, whilst we acknowledge that the city centre is typically well suited to higher intensity activities, we note that Council have identified issues of concern with the effectiveness of the existing Community Housing provisions in being able to deal with the range of potential environmental, social and economic effects from such activities in the city centre. The effects, from such activities of unlimited scale, including their cumulative impacts, have the potential to detract from and work counter to the strong vibrancy and vitality outcomes sought for the CCZ by the Operative CCZ policy framework.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ara Poutama Aotearoa- Department of Corrections	S_24	S_24_12			02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	CCZ-R38B	Oppose	Residential activities are permitted in the City Centre zones. Ara Poutama is concerned that the proposed inclusion of a generic category of "Other Residential Activities not expressly provided for" could result in residential activities that are not specifically captured by a Plan definition being classified as a Discretionary activity. That outcome would not support the increased supply of housing to meet the diverse needs of communities and a Discretionary activity status is not justified by reference to any environmental effects resulting from the Other Residential Activities.	1. Delete CCZ-R38B. 2. Alternatively, classify "Other Residential Activities not expressly provided for" as a permitted activity. 3. Any additional or alternative relief which addresses Ara Poutama's concerns outlined in this submission.	Refer to section 3.3.2 and 3.3.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_24	S_24_12	F_28	F_28_12	02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	CCZ-R38B	Support	The submitter supports this submission point for the same reasons applying to CCZ-R17A. HUD considers that CCZ-R38B introduces unnecessary regulatory discretion by capturing "other residential activities" without identifying specific environmental effects that require management. The submitter is concerned that this provision may inadvertently constrain residential and supported housing activities in the City Centre, increase consenting costs and delays, and expose such activities to public notification unrelated to land-use effects.	The submitter supports deletion of CCZ-R38B to improve certainty and maintain an enabling planning framework.	Refer to section 3.3.2 and 3.3.3	
Ara Poutama Aotearoa- Department of Corrections	S_24	S_24_13			03. Community Housing definition and provisions	RURZ-R17(1)	Neutral	Ara Poutama is neutral in respect of the proposed inclusion of a permitted activity standard for community housing which limits the number of people that may reside on site to 8 persons (including resident staff).	1. Retain proposed changes to RURZ-R17(1) as notified. 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing".	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_24	S_24_13	F_28	F_28_23	03. Community Housing definition and provisions	RURZ-R17(1)	Support	HUD supports this submission point. HUD agrees that retaining a permitted activity standard for community housing accommodating up to eight people in the Rural Zone provides an appropriate, effects-based baseline and recognises community housing as residential in nature. HUD considers that community housing at this scale does not, of itself, give rise to adverse environmental effects that would justify a resource consent requirement. Retaining RURZ-R17(1) as notified provides clarity and certainty, avoids unnecessary regulatory barriers for smaller-scale supported housing, and remains consistent with the stated intent of Plan Change 10 to improve the usability of the District Plan. HUD notes the submitter's broader concerns regarding the proposed definition of "community housing" and addresses those matters separately. In relation to the permitted activity standard in RURZ-R17(1), HUD supports retaining the provision as notified.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Hao Boutique Hotel Group	S_24	S_24_13	F_25	F_25_18	03. Community Housing definition and provisions	RURZ-R17(1)	Support	HBHG support their submission point to retain the proposed amendment to Rule RURZ-R17(1) as notified. HBHG support the reasons for this in Council's Section 32 Report in principle.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ara Poutama Aotearoa- Department of Corrections	S_24	S_24_14			03. Community Housing definition and provisions	RURZ-R17(3)	Oppose	Ara Poutama does not support the proposed Discretionary activity status for community housing with more than 8 people on the site. Ara Poutama considers that a Restricted Discretionary status with appropriate assessment criteria is more efficient and will ensure that any effects resulting from the exceedance in persons on site can be assessed.	1. Amend to have the activity status as Restricted Discretionary for RURZ-R17(3). 2. Any additional or alternative relief which addresses Ara Poutama's concerns with the proposed PC10 definition of "community housing".	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	

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TE Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_24	S_24_14	F_28	F_28_30	03. Community Housing definition and provisions	RURZ-R17(3)	Support	HUD supports this submission point. HUD agrees that classifying community housing accommodating more than eight people in the Rural Zone as a Discretionary activity imposes a disproportionate regulatory burden that is not justified by evidence of adverse environmental effects. HUD considers that community housing is residential in nature and that an exceedance of an occupancy threshold does not, of itself, result in effects that warrant full discretionary status. HUD is concerned that a Discretionary activity pathway increases consenting cost, delay, and the likelihood of public notification, which can materially constrain the timely provision of supported housing. HUD supports a Restricted Discretionary activity status as a more proportionate and effects-based approach, enabling consideration of relevant effects where scale increases, while avoiding unnecessary regulatory friction and uncertainty that is inconsistent with the stated intent of Plan Change 10 to improve clarity and usability of the District Plan.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Hao Boutique Hotel Group	S_24	S_24_14	F_25	F_25_19	03. Community Housing definition and provisions	RURZ-R17(3)	Oppose	HBHG oppose their submission point of having a restricted discretionary activity status instead of discretionary for Community Housing in the RURZ as notified. We consider that it would be a confusing outcome to allow and prioritise such activities of scale as being more anticipated in the rural areas than Visitor/Tourist Accommodation activities which are provided for as a discretionary activity. The Operative RURZ policy framework recognises that the rural zones allow a broad range of activities to take place and specifically recognises that tourist attractions and tourist accommodation are provided for in that mix. Introducing lesser activity statuses for other activities like Community Housing, would create confusing expectations on the treatment of activities such as Visitor/Tourist Accommodation that will remain regulated and anticipated by the Operative RURZ framework. HBHG note that Community Housing exceeding 8 persons, is already a non-complying activity under the Operative RURZ framework. Such activities can have significant adverse effects on rural character and amenity, through reduced levels of open space, over intensification in housing development, increased traffic levels and artificial lighting.	Such activities can also risk creating 'out of zone' development, and development that is unconnected with the rural economy. A non-complying activity status should therefore be retained as per the Operative plan.	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Hao Boutique Hotel Group	S_25	S_25_01			01. Tourist Accommodation Definition	Interpretation	Amend or support in part	Hao Boutique Hotel Group (HBHG) support the intent of the change to the new Visitor Accommodation definition. They note that it will provide greater clarity by removing ambiguous terms to recognise visitor accommodation as being distinct from boarding houses and private hotels. It will help re-focus Visitor Accommodation as being an activity that supports and strengthens Rotorua as a premier tourism destination by contributing to economic growth, cultural vibrancy, and visitor experience. However, the submitter considers that the new Visitor Accommodation definition should provide clarity as to what activities may constitute as 'ancillary activities' – like the wording of the current Tourist Accommodation definition. It is commonplace for visitor accommodation activities to include a range of ancillary activities that support and enhance the visitor experience. Therefore, greater certainty should be provided through the definition, that these activities would include, at least, for example, associated services or facilities such as visitor, service, conference, bar, restaurant, recreational activities and others of a similar nature. It is important that such a framework does not unduly restrict hotel expansion opportunities and associated tourism-supporting activities that contribute to the ongoing growth and vitality of Rotorua as a visitor destination.	Retain as proposed, but with amendment to the definition to include a range of example ancillary activities that are covered by the definition.	Refer to sections 3.2.2 and 3.2.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_25	S_25_01	F_28	F_28_03	01. Tourist Accommodation Definition	Interpretation	Oppose in part/amend	The submitter is concerned that replacing the definition of "Tourist Accommodation" with "Visitor Accommodation" effectively reclassifies motels and boarding houses used for emergency housing as residential activities. This reclassification is then used to justify more restrictive activity statuses under residential rules, including discretionary and non-complying pathways, without evidence that emergency or supported housing creates different or greater environmental effects than comparable accommodation activities. The submission notes that while the Section 32 Report acknowledges the need for subjective judgement in applying the visitor accommodation definition, PC10 increases regulatory triggers, consenting complexity, and the likelihood of public notification. Based on HUD's experience in Rotorua, this heightened regulatory friction results in delay and uncertainty when responding to urgent housing need. HUD considers that PC10 creates an imbalance by enabling and clarifying visitor accommodation while exposing emergency and supported housing to higher regulatory thresholds without locality-specific evidence. This outcome risks constraining the Government's ability to deliver timely housing support to vulnerable households and is inconsistent with national direction to support housing supply and access.		Refer to sections 3.2.2 and 3.2.3	
Hao Boutique Hotel Group	S_25	S_25_02			02. Provision for Boarding Houses, Communal or Shared Housing and Other Forms of Residential Activities	RESZ-R8A, COMZ-R33A, CC-17B, CCZ-33B	Support	The submitter supports the changes in principle, which provide targeted updates to specific rules in each zone to address the identified issues considered in the s32 Report in an efficient and effective manner.	Retain as notified	Refer to section 3.3.2 and 3.3.3	

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Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter	Recommended Decision	
Hao Boutique Hotel Group	S_25	S_25_03			03. Community Housing definition and provisions	Interpretation	Support	The submitter supports the changes in principle, which provide a definition update and targeted updates to specific rules in each zone to address the identified issues considered in the s32 Report in an efficient and effective manner.	Retain as notified	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_25	S_25_03	F_28	F_28_31	03. Community Housing definition and provisions	Interpretation	Oppose	HUD opposes this submission point. While the submitter expresses general support for the changes proposed through Plan Change 10, HUD does not support an unqualified endorsement of the plan change in its current form. HUD considers that Plan Change 10, as notified, has unintended consequences for the provision of community, supported, and emergency housing. In particular, HUD is concerned that the plan introduces higher regulatory thresholds, increased discretion, and greater uncertainty for supported housing activities, without demonstrating that these activities generate adverse environmental effects that justify such treatment. HUD's recent experience in Rotorua demonstrates that discretionary and non-complying activity pathways for emergency and supported housing result in significant regulatory friction, delay, cost, and public opposition unrelated to land-use effects. HUD is concerned that supporting Plan Change 10 without amendment would entrench these barriers and inhibit the Government's ability to respond effectively to housing need.	HUD supports amendments to Plan Change 10 to ensure the framework remains effects-based, proportionate, and consistent with national direction to enable housing supply and access.	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ara Poutama Aotearoa- Department of Corrections	S_25	S_25_03	F_24	F_24_14	03. Community Housing definition and provisions	Interpretation	Oppose	Ara Poutama considers the exclusions in the community housing definition: 1. Will significantly compromise the ability of Ara Poutama and other agencies to provide the necessary accommodation and support for people serving sentences or orders imposed by the courts and the New Zealand Parole Board within the community 2. Are not based on environmental effects that can or should be addressed under the RMA. 3. Will fail to account for the diverse range of housing needs within New Zealand communities. 4. Will result in a planning outcome which discriminates between activities based on the circumstances of the residents rather than for sound resource management reasons.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Hao Boutique Hotel Group	S_25	S_25_04			04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Oppose	The submitter opposes the proposed change to Rule CCZ-R1. The submitter notes that the proposed change is viewed as inefficient, ineffective, and misaligned with the Operative Rotorua District Plan (ODP). Instead of targeting specific problematic activities in the city centre, it removes the broad permitted activity rule entirely—an approach that would unnecessarily restrict many positive, everyday commercial activities such as cinemas, entertainment venues, recreation facilities, galleries, markets, and similar uses that contribute to a vibrant city centre. The s32 evaluation has not adequately assessed the economic, social, or development impacts of such a shift, nor has it considered how this would undermine the ODP's objectives, which explicitly promote a diverse, intensive mix of activities through an enabling regulatory environment. The proposal also fails to evaluate whether the remaining listed permitted activities would still support the diverse commercial mix the CCZ is intended to accommodate. Finally, the submitter notes that the change runs counter to emerging central government reforms aimed at creating a more enabling, growth-supportive planning system.	Delete the proposed change to Rule CCZ-R1. Retain Rule CCZ-R1 as per Operative District Plan.	Refer to section 3.7.2 and 3.7.3	
Te Tūāpāpa Kura Kainga Ministry of Housing and Urban Development	S_25	S_25_04	F_28	F_28_34	04. Default Activity Status in the City Centre 1 and 2 Zones	CCZ-R1	Support	HUD supports this submission point opposing the use of a blanket discretionary default activity status in the City Centre where this approach is not supported by targeted, effects-based analysis. HUD considers the proposed changes are not supported by the s32 analysis and risk unintended consequences. HUD considers that broad discretionary mechanisms and catch-all rules, rather than clearly identifying and regulating specific activities of concern, creates unnecessary regulatory burden and uncertainty. This approach increases consenting costs and the likelihood of public notification without demonstrating that such outcomes are required to manage environmental effects. Drawing on HUD's experience with emergency housing resource consents in Rotorua, discretionary and non-complying pathways have resulted in significant regulatory friction, delay, and opposition unrelated to land-use effects. HUD is concerned that similar outcomes would arise under the proposed City Centre provisions, inhibiting the timely delivery of housing and other activities that support community wellbeing.	HUD supports submission points seeking a more targeted and proportionate approach that retains an enabling planning framework while addressing demonstrated effects.	Refer to section 3.7.2 and 3.7.3	

Submitter Name	Sub ID #	Sub Point #	F Sub ID #	F Sub Point #	Topic	Plan Reference	Position	Summary of Submission Point	Relief Sought by Submitter	Recommended Decision	
Margaret Qu	S_26	S_26_01			03. Community Housing definition and provisions	Various	Amend or support in part	The submitter supports Plan Change 10's amendment to change the default activity status in the City Centre from Permitted to Discretionary (CCZ-R1), the inclusion of "public safety" in the Residential Objectives, and the clarification of definitions including Community Housing. These changes improve regulatory oversight and better recognise the importance of safety and cumulative effects. However, they oppose the absence of explicit spatial controls on emergency or welfare housing within the City Centre. Discretionary status alone may not adequately prevent clustering or cumulative impacts.	The submitter seeks amendments to the District Plan to introduce stronger spatial controls on emergency and welfare housing within the City Centre. Specifically, the submitter requests that emergency housing be classified as Non-Complying (or Prohibited) within a defined core commercial area, or be subject to explicit separation and concentration limits to prevent clustering. I also seek the inclusion of a clear objective or policy stating that the primary function of the City Centre is commercial, retail, tourism, and hospitality activity, and that land use decisions must protect and enhance this role.	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Hao Boutique Hotel Group	S_26	S_26_01	F_25	F_25_21	03. Community Housing definition and provisions			HBHG oppose their submission point in support of the proposed change to discretionary activity default status in the CCZ. The reasons for this are as per our original submission. It appears this submitter may not be fully aware of the true impact that the blanket rule change will have on the range of unspecified activities in the CCZ. In summary, HBHG consider that the rule change will unduly restrict and create further uncertain consenting processes on the very activities that ought to be prioritised and enabled in the CCZ as per the Operative District Plan policy framework.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Hao Boutique Hotel Group	S_26	S_26_01	F_25	F_25_20	03. Community Housing definition and provisions	Various	Support in part	HBHG part support their submission point with respect to their general desires for stronger regulation of emergency and welfare housing within the CCZ and seeking clear recognition in an objective and policy for promoting the primary function of the city centre for commercial, retail, tourism, and hospitality activity.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ara Poutama Aotearoa- Department of Corrections	S_26	S_26_01	F_24	F_24_15	03. Community Housing definition and provisions	Various	Oppose	Ara Poutama considers the exclusions in the community housing definition, inclusion of "public safety" in residential objectives RESZ-O7, RESZ-O14, and RESZ-O17, and making emergency housing non-complying or prohibited: 1. Will significantly compromise the ability of Ara Poutama and other agencies to provide the necessary accommodation and support for people serving sentences or orders imposed by the courts and the New Zealand Parole Board within the community. 2. Are not based on environmental effects that can or should be addressed under the RMA. 3. Will fail to account for the diverse range of housing needs within New Zealand communities. 4. Will result in a planning outcome which discriminates between activities based on the circumstances		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Lauren James (late submission)	S_27	S_27_01			03. Community Housing definition and provisions	Various	Amend or support in part	The submitter raises concerns that Plan Change 10 to the Rotorua District Plan, while framed as a technical refinement promoting certainty and economic growth, will have unintended but foreseeable negative impacts on supported and community housing, particularly for Māori. The submitter notes that plan change prioritises visitor and tourist accommodation through permissive provisions, while failing to adequately protect or enable housing responses for people experiencing homelessness, housing insecurity, or complex needs in particular for Māori. The submitter argues that supported and community housing is essential social infrastructure, not a commercial or discretionary land use. Compared with the permissive approach taken toward visitor accommodation, supported and community housing faces higher regulatory barriers, increased consenting costs, and greater uncertainty. This imbalance risks prioritising visitor needs over resident wellbeing and economic growth over social protection. The submission also notes that Plan Change 10 is inconsistent with Te Tiriti o Waitangi obligations and equity responsibilities, particularly given Rotorua's origins as a township gifted by Ngāti Whakaue for the purpose of enabling communities to live and flourish. There is a clear tension between Council's stated leadership on homelessness and planning provisions that constrain the delivery of supported and community housing.	The submitter seeks the following relief: Explicitly recognise supported and community housing as essential social infrastructure across appropriate zones. Remove or reconsider rigid occupancy thresholds in favour of effects-based assessments. Provide more permissive activity status for supported and community housing than is currently proposed. Actively enable kaupapa Māori and whānau-based housing models. Undertake equity and Te Tiriti impact assessments focusing on Māori housing outcomes. Better balance economic development objectives with the protection and expansion of affordable, public, and supported housing. The submission concludes that Plan Change 10, if unamended, risks worsening homelessness and housing instability in Rotorua, particularly for Māori, and that economic growth should not come at the expense of whānau wellbeing and housing security.	Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	
Ara Poutama Aotearoa- Department of Corrections	S_27	S_27_01	F_24	F_24_16	03. Community Housing definition and provisions	Various	Support	Ara Poutama supports the submission on the basis the exclusions in the community housing definition will constrain the availability of housing to meet the diverse range of housing needs within New Zealand communities. That includes the necessary accommodation and support provided by Ara Poutama and other agencies for people serving sentences or orders imposed by the courts and the New Zealand Parole Board within the community.		Refer to section(s) 3.4.2, 3.4.3, 3.5.2 and 3.5.3	

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