

Remember submissions close at 5pm, Friday 21 October 2022

# **Proposed District Plan submission form**

Clause 6 of Schedule 1, Resource Management Act 1991

Feel free to add more pages to your submission to provide a fuller response.

Form 5: Submission on Proposed Far North District Plan

**TO: Far North District Council** 

This is a submission on the Proposed District Plan for the Far North District.

#### 1. Submitter details:

Transport Public Access Subdivision

Zones in general

**Open Space and Recreation Zones** 

1. Submitter details:					
Full Name:	Our Kerikeri Community Charitable Trust				
Company / Organisation Name: (if applicable)	Our Kerikeri Community Charitable Trust				
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I <b>could</b> gain an adv	n advantage in trade com vantage in trade competi ge in trade competition t	ition through this submi			
	ted by an effect of the su	=	mission that:		
	ts the environment; and to trade competition or		petition		
I am not directly affected by an effect of the subject matter of the submission that:  (A) Adversely affects the environment; and  (B) Does not relate to trade competition or the effect of trade competition					
Note: if you are a person who could gain advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991					
The specific provisions of th	= = = = = = = = = = = = = = = = = = =	on relates to are:			
How the Plan Work	S				
<ul> <li>Definitions</li> </ul>					
Strategic Direction					



Confirm your position: Support Support In-part Oppose
The submitter opposes, supports or seeks amendment to the specific areas of the PDP identified in this submission.
The reasons are provided below

#### My submission is:

Active modes of transport and cycling networks

#### **Introduction & General Feedback:**

Our group advocates for step change within the Far North District to support the development of infrastructure needed for active modes of transport - to support transport options that reduce reliance on vehicles, reduce carbon emissions, reduce traffic congestion and bring health benefits.

The PDP, for example, should include policies and rules that require subdivisions and developments of a certain size to provide safe cycleways and pedestrian walkways/linkages that will be able to connect into future networks of cycleways and walkways (such networks to be identified in plans such as spatial plans or community transport plans for townships etc.).

We wish to stress the need for **safe** cycleways. Studies have shown that, for cycleways to become popular with a wide range of users and school students, people need to feel that cycleways are safe. This usually means cycleways need to be physically separated and protected from cars and other vehicular traffic. NZTA provides some helpful documents about separated cycleways.<sup>1</sup>

A similar issue exists for pedestrians on pathways shared with cyclists. Where shared paths are used by commuter cyclists or fast cyclists, the situation can be unpleasant or even unsafe for pedestrians. In such cases it is desirable to have separate paths for cyclists and pedestrians, so that people are not discouraged from walking.

The remainder of our comments focus on achieving better cycling networks throughout the District for transportation, recreation and tourism. We believe that ensuring efficient and effective multi modal transportation network that accommodates cyclists is critical to ensuring a resilient community, particularly in terms of addressing climate change, and good urban design outcomes. While connectivity is of particular relevance in our urban centres, they are only functional in this regard where direct routes are provided from residential and surrounding areas.

The provision of multi modal integrated transport networks also positively contribute towards the environmental, social and economic wellbeing of the District's communities through reduction of carbon emissions, improved mental and physical health, and by providing a lower cost transportation option.

Further, in regard to Kerikeri in particular, there are opportunities to develop the existing track network around suitable urban waterways, and make this an attraction for visitors to the area as Nelson has managed to do.

We consider that through effective and efficiently worded provisions, the District Plan can help to ensure that opportunities for multi modal transport connections are provided at the time of subdivision and development. Further, that undertaking works associated with establishing such networks are enabled, and incentivised to encourage inclusion of this important infrastructure.

Ad hoc development with little strategic direction has resulted in poor urban design outcomes and functionality (including lack of connectivity) in most of the District's urban centres. This is particularly evident around Kerikeri, Waipapa and Kapiro Road area where development has recently been undertaken, and more has been consented, with seemingly little ability to require any more than the bare minimum as set by a plan more than 20 years old.

We firmly believe that spatial planning is an essential valuable tool that needs to be used to provide strategic direction for Council and developers to ensure good integrated outcomes, and in the context of

<sup>&</sup>lt;sup>1</sup> NZTA information, Separated cycleways, <a href="https://www.nzta.govt.nz/walking-cycling-and-public-transport/cycling/cycling-standards-and-guidance/cycling-network-guidance/designing-a-cycle-facility/between-intersections/separated-cycleways/">https://www.nzta.govt.nz/assets/walking-cycling-and-guidance/cycling-network-guidance/tech-notes/TN002-separated-cycleways-guidance-note.pdf</a>



our interest, can be used to support the development of direct cycling and pedestrian links and reduce reliance on private vehicles.

While we are encouraged to see that integrated development is identified as a strategic direction of the PDP, it is difficult to see how this will be implemented without any spatial documents available to provide such direction, and consider the lack of such documents to be a missed opportunity to rectify the historic pattern of ad-hoc development done in isolation resulting in poor planning outcomes.

We encourage Council to continue to develop spatial and strategic planning documents to help rectify this legacy issue and future-proof our District, noting that we are still early in the statutory review process. As part of this submission we seek to provide a space holder through relevant provisions in the plan to enable Council to continue to develop such documents, and provide a mechanism to implement them, including through the review process should they be completed prior to the Proposed Plan being made Operative.

We have made comments on specific chapters, provided as **Attachment 1** below.

#### I seek the following decision from the Council:

- > DP objectives/policies should explicitly include the development of safe networks of walkways and cycleways (separated from motorised road traffic) that will actively promote alternative modes of transport in urban areas and beyond.
- Rules should require subdivisions in urban areas comprising more than 2 lots to include pedestrian footpaths suitable for disability scooters etc.
- Rules should require subdivisions comprising more than 4 lots and within cycling distance of a township or public facilities (e.g. school, sports field) to include safe cycleways (separated from road traffic) which will connect to a future network of cycleways.
- Please refer to detailed comments in Attachment 1

X   wish to be heard in support of my submission				
I do not wish to be heard in support of my submission				
(Please tick relevant box)				
If others make a similar submission, I will consider presenting a joint case with them at a hearing				
X Yes No				
Do you wish to present your submission via Microsoft Teams?				
X Yes No				
Signature of submitter:				
(or person authorised to sign on behalf of submitter)				
4				
Date:				
20/10/2022				
(A signature is not required if you are making your submission by electronic means)				

### **SUBMISSION NUMBER**

## **Attachment 1**

Sub#	Feedback Topic	Support/Oppose/Seek Amendment	Comments / Reasons	Relief Sought			
HOW T	HOW THE PLAN WORKS						
1	General	Support	Support planned growth as this helps ensure efficient and effective infrastructure, and connectivity. While it is acknowledged that there are no current growth strategies or structure plans, some are in development, and could be completed prior to the PDP being made Operative.  To ensure that these strategic documents can be given effect and implemented once approved by Council, provisions and assessment criteria that hold a space for these planning documents should be included.	Continue to develop spatial and strategic direction for the District's urban centres in particular, and include place holding provisions throughout the plan.			
DEFINI	TIONS CHAPTER						
2	Infrastructure	Support		Retain as drafted			
3	Development Infrastructure	Support	Support the definition of Development Infrastructure noting that the definition of Land Transport includes transport on land by any means and the infrastructure that facilitates it which would include cycling networks.	Retain as drafted			
4	Transport Infrastructure	Support		Retain as drafted			
5	Integrated Transport Network	Seek amendment	This is a term that is used often throughout the PDP but is not defined. The principal of	Include definition for 'Integrated transport network'.			

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			integrated transportation networks is supported, and it considered useful to have this term defined to ensure that it is clear to plan users what is meant.				
			The definition should include enforce the importance of connectivity, and multi modal transport options.				
STRAT	EGIC DIRECTION						
6	SD-SP-O4	Support, seek amendment	Integrated transport planning is a critical component to ensuring a coordinated response to land use development and good urban design outcomes. As noted earlier, it is considered that this is difficult to implement when strategic and spatial direction is lacking as the opportunity for triggers at development stage is missed and it sought that place holder are included throughout the plan to hold a place for the development of such documents (noting that the Transport Strategy does not appear to currently spatially identify any future transport networks). Without such guiding documents, it is unclear how the outcome sought by SD-EP-O4 will be achieved, particularly given that there are no policies associated with these objectives.	Seek the following amendments:  SD-EP-04 - People, businesses and places are connected digitally and through multi modal integrated transport network  -			
			Encouraging multi modal transport (e.g. cycling, walking and public transport), as a critical element to social and economic well being. Accordingly the following amendment to SD-EP-04 is sought.				

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7	Strategic Direction — Economic and Social Wellbeing — New Policy	New policy	Without policies, it is difficult to understand how the Strategic Direction is intended to be implemented throughout the plan. With specific regard to integrated transport networks, a policy is sought that provides this direction, and wording suggested.	Include corresponding policy to SD-EP-O4 regarded integrated transport networks:  SD-EP-PX  To ensure multi modal integrated transport networks by:  a. Requiring Integrated Transport Assessments at the time of subdivision.  b. Ensuring that provision for planned integrated transport networks is made at the time of development.  c. Funding for integrated multimodal transport networks is identified in the Long Term Plan
8	Strategic Development – Urban Form and Development.	New objective and corresponding policy	The District urban centers have been ad hocly developed, in most cases resulting in poor urban design outcomes. This chapter provides the first opportunity for a 'top down' approach to ensure that this is not the case going forward and that integrated development resulting in good urban design outcomes is achieved.  The objective in this chapter does this to an extent, but an additional objective should be included that expressly identifies the importance of urban design in insuring good urban form and development. See suggested wording for new objective and corresponding policy.	Include additional objective that acknowledged the importance of urban design in achieving integrated development and good urban form and development outcomes.  SD-UFD-OX  Urban growth and development is high quality and responds positively to the local context and outcomes expected for the zone.  SD-UFD-PX  To manage change in urban environments by ensuring a high level of amenity through quality urban design by:  a. Identifying areas where active frontages are required to support a

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				vibrant and pedestrianized environment  b. Requiring development in urban centers to show how they will contribute to a connected, distinctive attractive, appropriate, sustainable and safe urban form.  c. Ensuring that development responds to local context, including through alignment with relevant spatial or strategic document.		
TRANS	PORT					
9	TRAN - General	Support	In general, our group seeks to ensure that Council and Developers are required to ensure that land use and development considers transportation effects beyond the site. That cul-de-sac roads are generally discouraged unless provision has been made for future connectivity, and that multi modal transport planning is encouraged.	Seek changes to provisions within the plan that direct a high level of connectivity, integrated land use and transport planning, and multi modal transport networks.		
10	TRAN-O3	Support, seek amendment	The intent of the objective is unclear, but given TRAN – P2 & P1 it is likely intended to encourage integrated transport planning concurrently with development. Assuming this is the case (which would be supported) it could be made clearer. See suggested amendment	Amend TRAN-O3 as follows:  Land use and development planning, and transport planning all modes of transport are integrated so that the to ensure an efficient pattern of land use and transport networks that are transport network is, safe, efficient and well-connected.  Or  Add new policy that specifically addresses integrated land use and transport planning.		

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M	TRAN – O5	Support, seek amendment	As per above, the intended outcome of this objective is not entirely clear. see suggested wording.	Amend TRAN-O5 as follows:  The transport network provides for the safe and efficient movement of vehicular, cycle and pedestrian traffic, and that also meets the needs of persons with a disability or limited mobility
12	TRAN-P2	Support, seek amendment	Support acknowledgment of Twin Coast Trail and future cycling pathways, particularly where they contribute to connectivity. Seek inclusion of multi modal transport options to ensure social and economic well being of our communities, and to respond to climate change.  See suggested amended change to better reflect this.	Establish and maintain a transport network that:  a. provides safe efficient linkages and connections;  b. avoids and mitigates adverse effects on historical, cultural and natural environment values to the extent practicable;  c. recognises the different functions and design requirements for each road classification under the most current National Transport Network classification system;  d. supports reductions of greenhouse gases from vehicle movements including through implementation or multi modal transport options;  e. considers the likely current and future impacts of climate change when new sections of the network are proposed or existing sections upgraded; and  f. provides for existing and future pedestrian and cycling pathways that are well connected, including the Pou Herenga Tai Twin Coast Cycle Trail.

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13	TRAN- P5	Support	The intent of the objective is supported, but amendments are suggested to make this policy more impactful.	Encourage new land uses <u>and development</u> to support an integrated <u>and well connected</u> <del>and diverse</del> <u>multi modal</u> transport network by:
				a. Requiring consideration of promoting alternative transport modes at the time of land use and development;
				b. Ensuring that the construction of new transportation infrastructure aligns with relevant spatial or strategic document
				c. <u>Encouraging</u> the provision of safe and secure parking facilities for bicycles and associated changing or showering facilities for staff;
				d. Requiring allocation of parking facilities for motorcycles, mobility scooters, car share vehicles, pick up/drop off areas for ride share services and charging stations for electric vehicles; and
				e. supporting the establishment and operation of accommodation and tourism related activities in close proximity to the Pou Herenga Tai Twin Coast Cycle Trail, provided reverse sensitivity effects can be avoided.
14	TRAN-R2	Support, seek amendment	TRAN-R2 PER -1 allows private accessways where there is a maximum of 8 household equivalents (80 vehicle movements), where this cannot be achieved resource consent is required as a discretionary activity.	Amend TRAN-R2 to clarify that where TRAN-PER 1 cannot be complied, a public road that complies with TRAN-S4 is required to be vested in Council, or Discretionary resource consent required.

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			TRAN – R5 suggests that where TRAN-R2 is not complied with, private access may be required to vest as road. This connection/trigger for vesting or requirement to form to public road standard is not clear in TRAN – R2, noting that there is no link in this rule to TRAN-S4, and that TRAN-R8 only applies where within unformed paper roads, and SUB-R4 where the proposal is associated with subdivision.	
15	TRAN-R3	Support	Given that the definition of Transport Infrastructure extends to cycle ways, this rule is supported as it provides for maintenance and upgrade as a permitted activity.	N/A
16	TRAN – R6 and TRAN – R7	Support	Support the enablement of works within the Twin Coast Trail, this Trail is a critical tourism attraction for the District but also has great potential to operate more as a transportation network.	N/A
			It is hoped that this route, extensions to it and future routes can be mapped in the District Plan with similar enabling rules to provide for development, but also to protect these future corridors from development, and highlight opportunities for land/easement acquisition through subdivision and development.	
17	TRANS-S4	Oppose in part	Design of new roads is required in accordance with Councils Engineering Standards (2022) which require all new urban secondary collector and above roads to provide for cyclists separate to the movement lanes on the road, and Rural	Seek amendments that:  - Provide for design that exceeds that required in the Engineering Standards (e.g. provides for separated cyclist network where not otherwise required), particularly where in



Road on primary collector and above on a sealed shoulder. For all other roads (which is suspected in the majority, however the road categorization could not be found in the PDP maps) cyclists must use the movement lanes.

Provision for cyclists separate to vehicles on most roads throughout the District would be the preference, however, it is understood that the submission period for the Engineering Standards has closed.

It is sought that in the least, provision is made for the construction of roads that exceed the standards in the Engineering Standards, particularly where required by a spatial/strategic document.

Support requirement for Traffic Impact Assessment where a new road is constructed, noting the request below for an information requirement to clarify minimum information requirements.

As a general comment, cul-de-sacs should be disincentivized as they are widely accepted as presenting bad urban design outcomes, and are currently a favoured position of developers due to the lower costs associated.

As a minimum, in regard to TRAN-S4.2 The following additional requirements should be included:

-ITA with targeted information requirements should be required. Without

alignment with a spatial/strategic document.

Disincentivize cul-de-sacs

18	TRAN – Information	Seek amendment	this, cul-de-sacs are essentially further incentivized as a lower costs option.  -The cul-de-sac legal width must extend to the boundary of the site to facilitate future connection.  Seek that an information requirement be	Include information that specifies matters
	Requirement		included that details what information must be included in an integrated transport assessment. Being specific in the information required, can help direct the outcomes sought by the objectives and policies in this chapter and targeted to larger development. Without this direction, there is a high risk that very high-level documents, and potentially of limited use, will be provided resulting in the same marginal outcomes when it comes to transport network design at the time of development.  TRAN – S4 could then be amended to require a ITA prepared in accordance with the information requirement.	must be addressed, including the followin  Indication as to how connection of the made with any future transportation networks identified any spatial/strategic planning documents/how the proposal is consistent with such documents including the Transport Strategy  Assessment of the suitability and connectivity of the development including for pedestrians and cycling and how the development will be encourage walking and cycling  Evaluation of the effects of the development on surrounding transport networks including any pedestrian/vehicle/cyclist conflict likely to occur.
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19	PA – General Comment	Seek Amendment	It is considered that Council should take all opportunities to gain access to waterbodies, as there is always future potential for contributing to connectivity.  There no longer appears to be an esplanade priority mapped layer. It is considered that this layer can usefully inform applications	Seek that Council mapped esplanade prior layers that identify key areas for future connectivity purposes and include as an information layer in the District Plan

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			absolute minimum area that have been identified as part of future connections are not accidentally waived entirely or a limited width accepted.	
			This layer can also usefully be used to encourage voluntary creation where lots of less than 4ha as a mitigation measure or off set.	
20	PA – P3	Oppose, seek amendment	As a general comment the waiving of esplanade requirements is not supported.  However, if such a provision must be included it is sought that the wording is changed to make it clear that this should only occur in exceptional circumstances.  Accordingly, the following amendments are sought, noting the comment above in regards to mapping of esplanade priority.	Seek the following amendment to PA-P3  Allow Consider an application for waiver of any requirement for, or a reduction in the required width of, an esplanade reserve where the area is not identified as esplanade priority, and it can be demonstrated that:  a. safe and reasonable public access or recreational use already exists and can be maintained for the future, while considering the potential effects of climate change, including sea level rise, erosion and accretion;
				b. providing access will be detrimental to land and water-based habitats of indigenous flora and fauna within, and adjoining the margin;
				c. providing access will be detrimental to

any historic heritage place or site and

area of significance to Māori;d. it would protect the stability, performance, maintenance and operation of essential structures and

infrastructure; or

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				e. restrictions on public access are necessary to ensure public health and safety.
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21	SUB – O3	Support	Ensuring integrated provision of infrastructure (which includes cycle ways) development at the time of subdivision is supported	N/A
22	SUB – 04	Support, seek amendment		Seek the following amendment to SUB-O4.
				Subdivision is accessible, connected, and integrated with the surrounding environment <u>including</u> providing for:
				A. <u>future connectivity for pedestrians,</u> <u>cyclist</u>
				B. <u>new, and connection to existing</u> , public open spaces;
				C. esplanade where land adjoins the coastal marine area; and
				D. esplanade where land adjoins other qualifying waterbodies
OPEN	SPACE AND RECREATION ZON	NES		
23	NOSZ, OZS and SARZ – General		Seek to ensure that tracks for cyclists and pedestrians are enabled within this zone.	Enablement of tracks for cycling and walking
24	NOSZ – R1 and NOZ-R6	Support	Support the enablement of leisure activities as a permitted activity which would include tracks for cyclists and pedestrians, and as a result permit (subject to bulk and locating controls) associated buildings and structures e.g. bridges, boardwalks and gates. However, such an activity could also	Seek clarify around definitions, specifically in terms of recreation activity and leisure activity, and that Council carefully considers how definitions are used within/between chapters to ensure consistencies and avoid unintended consenting requirements.

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			fit the definition of recreation activity which is not permitted in this zone.  Clarity is needed in terms of the interrelationship between definitions noting that the definition of recreation activity includes refence to use of land for the purpose of leisure.	
25	OSZ- R1 and OSZ -R6	Seek amendment	This rule permits buildings (subject to bulk and location controls) where they are associated with a permitted activity. However, leisure activities are not permitted in this Zone but recreation activities are.	As above
			See comment above re: definitions	
26	SARZ – R1 and SARZ – R3	Seek amendment	As above	As above
OTHER	ZONES			
27	Commercial and Mixed Use Zones – General		In general, it is sought that good urban design outcomes are encouraged in the urban centers throughout the District. However, given that only one commercial zone has been picked from the available options (Mixed Use Zone), this provides limited ability to really target this in a meaningful way.	Seek that Council introduce additional commercial and mixed use zones to better manage the larger urban centers (such as Kerikeri) and develop a set of urban design guidelines to be referenced.
			Accordingly, in general more targeted zoning in the urban centers is sought. Further it is considered that the development of urban design guidelines and reference to the guidelines in any Commercial Zone would help to clearly direct good urban design outcomes.	

28	MUZ – O2 and MUZ -P3	Support	Generally, support the objective and policy as they require consideration of urban design principals.	
29	MUZ – P5	Seek amendment		Seek the following amendments:  Manage land use and subdivision to address the effects of the activity requiring resource consent, including (but not limited to) consideration of the following matters where relevant to the application:  a. consistency with the scale, density, design, amenity and character of the surrounding mixed use environment, and with the urban design guidelines;  b. the location, scale and design of buildings or structures, outdoor storage areas, parking and internal roading;  c. at zone interfaces:  i. any setbacks, fencing, screening or landscaping required to address potential conflicts;  ii. any adverse effects on the character and amenity of
				adjacent zones;  d. the adequacy and capacity of available or programmed development infrastructure to accommodate the proposed activity; including:  i. opportunities for low impact design principles;

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				ii. management of three waters infrastructure and trade waste;
				e. managing natural hazards;
				<ul> <li>f. the adequacy of roading infrastructure to service the proposed activity;</li> </ul>
				g. <u>alignment with any strategic or spatial</u> <u>document;</u>
				h. <u>provisions made to ensure</u> <u>connectivity;</u>
				<ul> <li>i. any adverse effects on historic heritage and cultural values, natural features and landscapes or indigenous biodiversity, and</li> </ul>
				<ul> <li>j. any historical, spiritual, or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6.</li> </ul>
30	LIZ-P6	Seek amendment	The LIZ is located on many of the urban center peripheries and in some instances between commercial and residential. Ensuring connectivity is provided for is critical through these areas to ensure	Manage land use and subdivision to address the effects of the activity requiring resource consent, including (but not limited to) consideration of the following matters where relevant to the application:
			integrated and well connected communities.	<ul> <li>a. consistency with the scale, density, design and character of the light industrial environment and purpose of the zone;</li> </ul>
				<ul> <li>alignment with any strategic or spatial document;</li> </ul>
				c. <u>provisions made to ensure</u> <u>connectivity;</u>

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d. the location, scale and design of buildings or structures, outdoor storage areas, parking and internal roading;
e. for non-industrial activities:
i. scale and compatibility with industrial activities;
ii. potential reverse sensitivity effects on indust activities.
f. at zone interfaces:
i. any setbacks, fencing, screening or landscaping required to address potential conflicts;
ii. any adverse effects on the character and amenity of adjacent zones.
g. the adequacy and capacity of available or programmed development infrastructure to accommodate the proposed activity; including:
i. opportunities for low impa- design principles;
ii. management of three wate infrastructure and trade waste such as industrial by products.
h. managing natural hazards;

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				<ul> <li>i. the adequacy of roading infrastructure to service proposed activity;</li> </ul>
				j. any adverse effects on historic heritage and cultural values, natu features and landscapes or indige biodiversity; and
				k. any historical, spiritual, or cultura association held by tangata when with regard to the matters set ou Policy TW-P6.
31	GRZ – P8	Seek amendment	The Residential Zone borders commercial areas, to ensure real integration, connectivity must be ensured in the residential zones as well.	Manage land use and subdivision to address the effects of the activity requiring resource consent, including (but not limited to) consideration of the following matters where the relevant to the application:
				<ul> <li>a. consistency with the scale, design amenity and character of the residential environment;</li> </ul>
				b. the location, scale and design of buildings or structures, potenti shadowing and visual dominance,
				c. <u>alignment with any strategic or sp</u> <u>document;</u>
				d. <u>provisions made to ensure</u> <u>connectivity;</u>
				e. for residential activities:
				i. provision for outdoor livi space;
				ii. privacy for adjoining site:
				iii. access to sunlight;

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		f.	for non-residential activities:
			<ul> <li>i. scale and compatibility with residential activities</li> </ul>
			ii. hours of operation
		g.	at zone interfaces, any setbacks, fencing, screening or landscaping required to address potential conflicts;
		h.	the adequacy and capacity of available or programmed development infrastructure to accommodate the proposed activity, including:
			<ul> <li>i. opportunities for low impact design principles</li> </ul>
			<ul><li>ii. ability of the site to address stormwater and soakage;</li></ul>
		i.	managing natural hazards; and
		j.	any historical, spiritual, or cultural association held by tangata whenua, with regard to the matters set out in Policy TW-P6.