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FURTHER SUBMISSION ON PROPOSED WAIKATO DISTRICT PLAN 2018 (STAGE 1)

Introduction

This Submission is from:

The Surveying Company
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The Surveying Company notes Council's considerable effort to summarise and report on the numerous submissions received. We thank you for preparing this comprehensive document as it has helped us to better understand the other stakeholders' view points, and provide additional comment back to Council.

The Surveying Company is a multi-disciplinary Property Development Consultancy that has been providing Planning, Surveying and Civil Engineering services throughout the Waikato, Auckland, including the former Franklin, Papakura, Manukau Districts, and Hauraki Districts for the past 30 years. This includes the application and management of Subdivision Resource Consents and Land Use Consents associated with the use and development of land.

The Surveying Company prepared a submission number 746 on the Proposed Waikato District Plan (PWDP) and has an interest in the proposal greater than the interest that the general public.

We wish to be heard at the hearing in support of this further submission. If others make a similar submission I will consider presenting a joint case with them at the hearing.

We have added further pages/sheets that form part of our further submission.



We understand that we are responsible for serving a copy of our further submission on the original submitter(s) within 5 working days after it is served on Council.

Prepared by:

THE SURVEYING COMPANY LTD

Reviewed by:



LEIGH SHAW

Planning Manager

Authorised by:



JOHN GASSON

Director



Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Libby Gosling for Classic Builders Waikato Limited 123	123.3	Section C Rules 16.1 3 RD Activities	Delete Rule 16.1.3 RD1 (c) Restricted Discretionary Activities, which requires a minimum net site area of 300m ² for multi-unit development OR Amend Rule 16.1.3 RD1 (c) Restricted Discretionary Activities to reduce the minimum net site area to less than 300m ² for each unit for multi-unit development.	Support in Part	<p>We support the intent of this provision which is seeking greater flexibility for multi-unit developments.</p> <p>Residential development on smaller lots represents a sustainable use of the urban land resource where onsite and offsite amenity is maintained. The Plan has a comprehensive set of standards (rules) that help to determine if a development is appropriate for the site area. There is no benefit in setting a minimum area for each unit.</p> <p>The outcomes sought by the submission will ensure variety in the future housing stock to help achieve policies 4.1.2, 4.1.5, 4.2.16 and 4.2.17.</p>
Libby Gosling for Classic Builders Waikato Limited 123	123.4	Section C Rules 16.2 1 Earthworks	Delete Rule 16.2.4.1 P1(a) (vi) Earthworks – General requiring earthworks to be a minimum of 1.5m from all boundaries.	Support	<p>We agree that this minimum setback is impractical, particularly as section sizes get smaller.</p> <p>It is often necessary to undertake earthworks to create the footings etc. for the foundation which would be within this 1.5m area and trigger resource consent.</p>
Kathleen Reid	130.3	22.3.2 Minor dwelling	Delete the requirement in Rule 22.3.2 P1(b)(ii) for the minor dwelling to be located within 20m of the existing dwelling. AND Delete the requirement in Rule 22.3.2 P1(b)(ii) Minor dwelling for minor dwellings to share a driveway with the existing dwelling.	Support	For the reasons given in submission point 14.2.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Steve Cochrane	14.2	22.3.2 Minor dwelling	Amend Rule 22.3.2 P1 Minor dwelling to provide more flexibility in the location of minor dwellings on the site.	Support	<p>It is noted that the definition refers to the minor dwelling being 'a second dwelling independent of the principal dwelling.'</p> <p>This does not have the same meaning as 'subsidiary' which would imply dependence on the principal dwelling. As there is no longer a requirement for dependents to live in a minor dwelling, there needs to be greater scope in the location of a minor dwelling. It may not be realistic to have a minor dwelling within 20m due to geographical constraints of the site.</p> <p>With the exception of 22.3.2 P1(b)(ii), which requires the minor dwelling must share a single driveway access with the existing dwelling, there are no other standards that require the minor dwelling to be dependent on or share services or infrastructure with the principal dwelling.</p> <p>On a Rural zoned property, sheds can be located anywhere on the property so long as they comply with the yard requirements and daylight admission rules. Minor dwellings should have a similar approach. There is no need for the principal and minor dwelling to be located in close proximity. It may be better for workers to live more than 20m away from the principal dwelling in order to provide onsite farm assistance, animal husbandry, and security.</p> <p>A minor dwelling is able to provide full facilities that would enable it to be lived in independently. Minor dwellings provide housing choice and affordable options for housing. The size limit ensures they will be secondary to the primary dwelling.</p>

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Jeska McHugh for NZ Pork	197.23	22.3.2 Minor dwelling	Add separate provisions for farm workers accommodation.	Support in part	<p>For the reasons given in submission points 14.2 and 419.25.</p> <p>I seek that the part of the submission to add new provisions for farm workers accommodation be allowed.</p>
Jeska McHugh for NZ Pork	197.24	22.3.6 Building coverage	Delete Rule 22.3.6 Building coverage.	Support	<p>There is no need to restrict building coverage for permitted and controlled farming activities for the reasons given in our original submission.</p> <p>We agree that rural buildings irrespective of their size are an accepted element of rural character and amenity. The building coverage limitation and subsequent discretionary activity status for non-compliance is a constraint for rural production activities and will not encourage reinvestment or expansion in the Waikato District.</p>
Jeska McHugh for NZ Pork	197.29	22.3.7.2 Building setback sensitive land use	Retain Rule 22.3.7.2 P1 Building setback sensitive land use as notified.	Oppose in part	<p>This rule sets an arbitrary distance for all 'intensive farming' which is not necessarily reflective of the effects of a poultry farm.</p> <p>It also results in all properties within 300m of the boundary of a site proposed for a poultry farming operation being considered as adversely affected for notification purposes. This because the establishment of a new poultry farm would restrict a neighbour's ability to establish a potential dwelling or minor dwelling (or other residential activity like a sleepout) as a permitted activity in the future.</p> <p>The setback distance needs to be justified, amended or deleted in relation to poultry farming and/or the definition of sensitive land use (which includes residential activities) amended so that it does not unduly result in the notification of applications for new</p>

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					<p>poultry farms.</p> <p>In addition, any setback should be taken from the intensive farming activity itself, not the site boundary of the activity. This is because the effects that the setback is trying to mitigate are generated by/from the activity, not the site boundary. If an intensive farming activity decides to expand in the future within the site boundary then the effects of this on the receiving environment will simply need to be addressed at that time and the application considered on its merits.</p> <p>When combined with Rule 22.1.3(e)(i), there is a total setback of 600m that affect poultry farm applications (i.e 300m from the their site boundary to be a restricted discretionary activity and 300m from any dwelling/minor dwelling (or other sensitive activity like a sleepout) that is either existing or potentially able to be constructed on neighbouring land. It is almost impossible for a site to be found in the District where the 'Building setback sensitive land use' rule would not affect the establishment/notification of a poultry farm.</p>

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Katherine Wilson for Property Council New Zealand	198.1	General plan (structure, numbering, all-of-plan)	Place on hold the District Plan review process to align with the Ministry for the Environment's National Planning Standards, incorporate structure plans as a result of current blueprinting work and incorporate a Natural Hazards chapter.	Oppose in Part	<p>We agree the Waikato District Plan should be consistent with the National Planning Standards, however, this should not delay the planning process.</p> <p>We oppose the submission as it seeks to place the District Plan Review process on hold. Waikato District Council has already withdrawn the Tuakau Structure Plan to align with the Waikato District Plan resulting in a significant delay of live zoning in Tuakau. In addition, the Waikato District jurisdiction operates under two outdated Plans and these Plans need to be merged for consistency.</p> <p>The Blueprint is a non-statutory document which covers a range of issues many of which are not implemented through the District Plan. The document is flexible and adaptive therefore is subject to change over the lifetime of the District Plan.</p>

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Zeala Ltd Trading as Aztech Buildings 281	281.1	Other	Defer the hearing of submissions until after the adoption of the National Planning Standards, and/or after Stage 2 of the review of Future Proof/updated Waikato Regional Policy Statement.	Oppose	<p>We agree the Waikato District Plan should be consistent with the National Planning Standards, however, this should not delay the planning process.</p> <p>We oppose the submission as it seeks to place the District Plan Review process on hold. Waikato District Council has already withdrawn the Tuakau Structure Plan to align with the Waikato District Plan resulting in a significant delay of live zoning in Tuakau. In addition, the Waikato District jurisdiction operates under two outdated Plans and these Plans need to be merged for consistency.</p> <p>Continual delays of the Plan defer living zoning of land and restrict the ability of the Council to rezone/upzone land to meet the existing development capacity needs.</p> <p>The Proposed Waikato District Plan has accommodated for substantial growth through live zoning in identified areas that are consistent with the Future Proof Strategy.</p> <p>The Blueprint is a non-statutory document which covers a range of issues many of which are not implemented through the District Plan. The document is flexible and adaptive therefore is subject to change over the lifetime of the District Plan.</p> <p>The District Plan is not a fixed document and is subject to change through its lifetime. The Plan Change process allows changes to be made to the Plan.</p> <p>If the Waikato District Council were to continually wait for all other relevant documents to be reviewed/updated/operative the District Plan would never be completed.</p>

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Jeremy Talbot for Barker & Associates Limited on behalf of EnviroWaste New Zealand Limited	302.27	22.3.6 Building coverage	Delete Rule 22.3.6 Building coverage. AND Amend the Proposed District Plan to make consequential amendments or additional amendments to address the matters raised in the submission.	Support	For the reasons given in submission point 197.24.
Jeremy Talbot for Barker & Associates Limited on behalf of EnviroWaste New Zealand Limited	302.28	22.3.7 Building setbacks	Amend Rule 22.3.7 Building setbacks to reduce the yard separation between sites (other than a road) to 12m or less in all instances. AND Amend the Proposed District Plan to make consequential amendments or additional amendments to address the matters raised in the submission.	Support	There is no need for a 25m setback for the reasons given in our original submission. We agree that setbacks could be reduced and still achieve sufficient separation between activities – and maintain an open landscape character.
EnviroWaste New Zealand Limited #302	302.30	22.4.1.1 – Prohibited Subdivision	Delete rules that makes any rural subdivision prohibited. Effects on soils can be managed in other ways which are consistent with the ‘effects based approach’ to resource management.	Support	We agree that high-class soils can be adequately protected through the objectives and policies and Non-Complying Activity status.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Fiona McNabb for Whaingaroa Raglan Affordable Housing Project 310	310.9 310.14	16.3.1 Dwelling	Add new rule to Rule, 16.3.1 P2 Dwelling as follows: (a) Three dwellings within a site, if at least two of the dwellings are small houses each with a gross floor area of less than 45m2. Amend Rule 16.3.1 Dwelling, to allow more than one primary dwelling and one minor dwelling per site.	Support in Part	We support the submission to allow more than one primary dwelling per site. This is similar to our submission which seeks to allow up to three dwellings as a permitted activity through amendments to the multi-unit housing provisions, However, we see no valid reason to restrict the size of the dwelling if there is compliance with the bulk and location standards.
Harpal Singh Sandhu #311	311.4, 311.5	22.4.1.1 – Prohibited Subdivision	Amend rule to change the status from Prohibited to Non-Complying.	Support	We support this submission point and agree with the comments.
Metro Planning Limited #312.2	312.2	22.4.1.1 – Prohibited Subdivision	Delete all references to Prohibited Subdivision.	Support	We support this submission point and the reasons provided by this submitter.
Russell Grey	333.1	24.3.5 Building coverage	Amend Rule 24.3.5 P2 Building Coverage, reducing the provision from 20% to 15%.	Oppose	20% allows greater flexibility in housing choice and built form. Buildings are anticipated for this zone and do not need to be further restricted by reducing the building coverage. 20% building coverage will achieve adequate low density housing opportunities while continuing to provide a sense of open space between properties.
Brent Trail #345	345.1	22.4.1.1 PR4 – Prohibited Subdivision	Amend PR4 to allow subdivision by conservation lot, reserve lot or access or utility allotment.	Oppose	We oppose the inclusion PR4 in its entirety. Assessment on a case by case basis to ensure any subdivision does not undermine the original purpose of the amalgamation is appropriate.
Ian McAlley 368	368.23	Section C Rules 16.2 1 Earthworks	Delete Rule 16.2.4.1 NC1- Earthworks - General, the assessment of the importation of clean fill to a site as a non-complying activity.	Support	Agree that the assessment of the importation of clean fill to a site as a non-complying activity is overly onerous. Fill may be required to meet engineering requirements.
Ian McAlley 368	368.40	4.7.2 Policy – Subdivision location and design	Delete Policy 4.7.2 (a)(vii) Subdivision location and design requiring grid layout.	Support	This is consistent with the decision sought in our submission.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Ian McAlley 368	368.8	4.2.15 Policy Earthworks	Amend Policy 4.2.15(a)(iv) - Earthworks, to read as follows: The importation and exportation of clean fill is avoided in the Residential Zone.	Oppose	There are certain sites where clean fill is required to be imported or exported to ensure that development can occur. It is not always possible to achieve a cut to fill balance, particularly where Structure Plan signals the protection of ridgeline or hills.
Steve van Kampen for Auckland Council 372	372.16	Section C Rules 16.1 3 RD Activities	Amend Rule 16.1.3 Restricted Discretionary activities, as it relates to Pokeno and Tuakau as follows: A Multi-Unit development that meets all of the following conditions: (a) The Land Use – Effects rules in Rule 16.2; (b) The Land Use – Building rules in Rule 16.3, except the following rules do not apply: (i) Rule 16.3.1, Dwelling; (ii) Rule 16.3.8 Building coverage; (iii) Rule 16.3.9 Living court; (iv) Rule 16.3.10 Service court; (c) The minimum net site area per residential unit is 300m ² ; (d) The Multi-Unit development is connected to public wastewater and water reticulation OR Add an alternative residential zone for Pokeno and Tuakau which provides for terraced housing.	Support in Part	<p>We support the intent of this provision which is seeking greater flexibility for multi-unit developments</p> <p>We agree that more flexibility is required to enable multi-unit development. I agree with the submitter's comment that the 3000m² net lot size will not provide for or encourage intensification of an existing urban area or facilitate housing variety. We support greater flexibility in the multi-unit housing rules where they promote more intensive development.</p> <p>The outcomes sought by the submission will ensure variety in the future housing stock to help achieve policies 4.1.2, 4.1.5, 4.2.16 and 4.2.17.</p>
Steve van Kampen for Auckland Council	372.17	22.3.7.1 Building Setbacks – All boundaries	Retain Rule 22.3.7.1. Building setbacks - All boundaries.	Oppose	For the reasons given in our original submission.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Steve van Kampen for Auckland Council	372.18	22.3.7.2 Building setback sensitive land use	Retain Rule 22.3.7.2. Building setback - sensitive land use.	Oppose in part	For the reasons given in submission point 197.29.
Auckland Council #372	372.19	22.4.1.1 – Prohibited Subdivision	Retain in full – supports provisions that protect and retain high class soils, particularly for their value in food production.	Oppose	A prohibited status is not needed to achieve the protection and retention of high-class soils, is unnecessarily restrictive and may result in unintended limitations on the rural production activities. Policy 14.2 seeks to avoid the decline in the availability for primary production due to the inappropriate subdivision, use or development. The strength of the objectives and policies of the Proposed Plan, together with a Non-Complying Activity status will give effect to this Policy. The loss of high-class soils needs to be considered in balance with many other factors such as rural landscape and character, and rural production. Subdivision around existing, established activities such as greenhouses, packing sheds etc. may also be economically enabling for the primary production industry and should not be unnecessarily prohibited, but rather considered on a case by case basis. Prohibiting any subdivision of a lot previously amalgamated for the purpose of a transferable lot subdivision is restrictive well beyond the intent of the legacy plan and will result in rural landowners being unable to use boundary relocation as a land management tool. Inclusion of PR4 is completely contrary to the direction of Plan which is to enable rural production.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Auckland Council #372	372.19	22.4.1.1 PR4 – Prohibited Subdivision	Retain in full – to ensure that no additional lots are subdivided where a transferable lot has occurred in the past	Oppose	<p>We oppose this submission point. This rule, as currently written, restricts all subdivision of any lot created for the purpose of a transferable rural lot subdivision under the Franklin Section by amalgamation or resurvey.</p> <p>The absence of transferable lot right subdivision from the and inclusion of a pre-1997 title date in the general subdivision provisions large restricts further subdivision and the creation of additional lots where post-1997 titles for donor lots have been issued.</p> <p>Many donor properties for transferable lot subdivision under the Franklin Section also contain no high-class soils. Therefore prohibition of further subdivision of these Records of Title does not achieve the objectives and policies of the Plan. It also denies rural land owners the ability to create conversation lots or undertake a boundary relocation with an adjoining land owner, both of which have potential positive benefits.</p>
Auckland Council #372	372.21	Rule 22.4.1.5 Rural Hamlet Subdivision	Amend this rule to ensure rural hamlets are sited around existing towns and villages.	Oppose	<p>We oppose this submission point, the point of a Rural Hamlet is to allow for small lot living in a rural setting. Sitting on the outskirts of towns and villages would not achieve this. The Rural Hamlet provisions allow for well-designed and sited Hamlets with the positive benefit of shared infrastructure and amalgamation of the balance farmland.</p>

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Steve van Kampen for Auckland Council 371	372.23	General plan (structure, numbering, all-of-plan)	Amend Chapter 4 Urban Environment, Chapter 16 residential Zone, the Planning Maps and any other provisions that are proposed for 'live' Residential zoning in unserviced urban residential areas in and around Pokeno and Tuakau where there is uncertainty about the funding, staging and timing for infrastructure provision.	Oppose	<p>Infrastructure provision and development of infrastructure can sit alongside the District Plan. There is no need to stage live zoning within the District Plan as properties can be live zoned and developed where infrastructure is available.</p> <p>Structure Planning and a staged growth approach will delay the provision of land for development.</p> <p>There is a range of non-statutory mechanisms that can be used to determine the provision of infrastructure for live zoned properties.</p> <p>We do not believe that the use of 'future urban' zones or 'urban expansion' overlays are the best option as these result in land banking and inefficiency in land use in the interim period until the land is rezoned through a structure Plan process.</p> <p>Rezoning of land in Tuakau has already been delayed by a Council decision to withdraw the Tuakau Structure Plan. Deferring live zoning to prepare a Structure Plan for Tuakau would further delay live zoning of land, much of which was identified for growth 10 years ago by the Franklin District Growth Strategy.</p> <p>Landowners and developers in Tuakau are experiencing 'consultation burnout' despite 10 years of consultation no additional land has been live zoned. It is inefficient and unsustainable to delay live zoning any further.</p>

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Jolene Francis 376	376.4	General plan (structure, numbering, all-of-plan)	Place the Proposed District Plan on hold pending the outcome of the other Strategic Planning currently underway, including Future Proof Phase 2 and the Hamilton to Auckland Corridor network plan.	Oppose	<p>We agree the Waikato District Plan should be consistent with the National Planning Standards, however, this should not delay the planning process.</p> <p>We oppose the submission as it seeks to place the District Plan Review process on hold. Waikato District Council has already withdrawn the Tuakau Structure Plan to align with the Waikato District Plan resulting in a significant delay of live zoning in Tuakau. In addition, the Waikato District jurisdiction operates under two outdated Plans and these Plans need to be merged for consistency.</p> <p>Continual delays of the Plan defer living zoning of land and restrict the ability of the Council to rezone/upzone land to meet the existing development capacity needs.</p> <p>The Proposed Waikato District Plan has accommodated for substantial growth through live zoning in identified areas that are consistent with the Future Proof Strategy.</p> <p>The Blueprint is a non-statutory document which covers a range of issues many of which are not implemented through the District Plan. The document is flexible and adaptive therefore is subject to change over the lifetime of the District Plan.</p> <p>The District Plan is not a fixed document and is subject to change through its lifetime. The Plan Change process allows changes to be made to the Plan.</p> <p>If the Waikato District Council were to continually wait for all other relevant documents to be reviewed/updated/operative the District Plan would never be completed.</p>

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Brent Trail for Surveying Services Ltd	382.7	24.4.11 Subdivision Creating Reserves	Amend Rule 24.4.11 RD1 (a) Subdivision Creating Reserves, by replacing 50% with 20%.	Oppose	Rule 24.4.11 RD1(a)-Subdivision Creating Reserves should be deleted and made into a matter of discretion. Rooding infrastructure is expensive and the rule will result in additional costs for developers which may not be justifiable from an economic perspective. The enforcement of the rule may increase the cost of development which could be passed onto purchasers. This is an arbitrary standard which may not be relevant for all reserve types or developments. Safety and surveillance of reserves may be achieved with less road frontage. There is no analysis in the s32 stating why the 50% road frontage rule has been applied. While this may be a principle to follow it should not be enforced through a rule.
Mel Libre	407.3	22.3.2 Minor dwelling	Delete Rule 22.3.2 P1(b)(i) Minor dwelling, requiring a minor dwelling to be within 20m of the main dwelling.	Support	For the reasons given in submission point 14.2.
Ethan Findlay 418	418.1	General plan (structure, numbering, all-of-plan)	The submitter supports relocatable or second-hand buildings being permitted activities.	Support	Removes consenting cost creating efficiencies for alternative and more affordable housing options. This helps to address the issues identified in the district plan around housing affordability and variety.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Lucy Deverall for Horticulture New Zealand	419.25	22.3 Land Use - Building	Add a new provision to Rule 22.3 Land Use - Building, as follows: Workers' accommodation	Support in part	<p>We agree that there should be some provision made for workers' accommodation, even if this is provided for as a restricted discretionary activity. Workers accommodation can play an important part in the long term viability and expansion of legitimate rural production activities on sites under 40 hectares in size.</p> <p>Whilst a minor dwelling of up to 70m² provides one option for housing farm workers, it does not adequately cater for a farm worker with a family or seasonal workers sharing communal facilities. A larger dwelling is required to cater for a farm employee and their family.</p>
Horticulture New Zealand #419	419.3	Rule 22.4.1.2 General Subdivision	Delete Rule 22.4.1.2 General Subdivision.	Oppose	The General Subdivision provisions and the associated title do limit the number of these lots that can be created within the Rural Zone
Horticulture New Zealand #419	419.36,419.37	22.4.1.1 PR2 – Prohibited Subdivision	Delete Prohibited Subdivision P2.	Support	We agree that a Non-Complying Activity status is appropriate to allow Council a high degree of scrutiny to ensure high-class soils are retained and protected. With regards to comments about conservation lots and reserve lots sitting on high-class soils, we are of the opinion that this matter is appropriately addressed as a matter of discretion for these types of subdivision.
Horticulture NZ #419	419.39	Rule 22.4.1.5 Rural Hamlet Subdivision	Amend this to restrict loss from located on high class soils and add a matter of discretion regarding water conservation and low impact storm water design.	Oppose	We oppose this submission point - that Hamlets should be restricted from sitting on High-Class Soils. We recognise this is an important consideration and the objectives and policies give high-class soils considerable weighting, however, hamlet design needs to also consider landscape, character, amenity and servicing matters.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Horticulture NZ #419	419.40	Rule 22.4.1.6 Conservation Lot Subdivision	Seeking the addition of a new rules – that proposed lots must not locate on high class soils.	Oppose	We oppose this submission point and would prefer to see consideration of high-class soils and the primary production activity identified as a matter of discretion for this type of subdivision.
Horticulture NZ #419	419.57	Add a new policy to Section 5.3	Addition of a new policy regarding rural character and amenity.	Support	We support plan provisions that allow for greater consideration of the range of factors that contribute to localised rural character and amenity values within the District.
Madsen Lawrie Consultants Limited #420	420.1	22.4.1.1 PR3 – Prohibited Subdivision	Amend 22.4.1.1 PR3 – Prohibited Subdivision to exclude the amalgamation between records of titles that existing prior to 6 December 1997.	Oppose	We wholly oppose the inclusion of Prohibited subdivision irrespective of amendments. A prohibited status should only be applied where there is no case for exceptions and based on our experience this is simply not the case with subdivision. Subdivision can be undertaken for a number of reasons which may achieve the purpose of the Act and the strategic direction of the relevant plans. Non-Complying Activity status is appropriate to give Council opportunity to apply greater scrutiny to proposed subdivision identified as Prohibited in the Proposed Plan.
Wasley Knell #421	421.1	22.4.1.1 – Prohibited Subdivision	Add a new clause to PR2(a) and PR3(a) to exclude land not deemed high class prior to soil improvements works undertaken.	Oppose	For the same reasons provided in submission point 420.1, we oppose the inclusion of any rule prohibiting any form of subdivision.
Grant Ruan #424	424.4	22.4.1.1 – Prohibited Subdivision	Amend Rule 22.4.1.1 to allow for case by case consideration.	Oppose	For the same reasons provided in submission point 420.1, we oppose the inclusion of any rule prohibiting any form of subdivision.
Madsen Lawrie Consultants Ltd #434	434.2	22.4.1.1 – Prohibited Subdivision	Amend Rule 22.4.1.1 PR3(c) to exclude titles whose date is newer than 6 th December 1997 where land has been taken under the Public Works Act.	Oppose	For the same reasons provided in submission point 420.1, we oppose the inclusion of any rule prohibiting any form of subdivision.

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Madsen Lawrie Consultants Ltd #444, #446, #449, #453, #455, #456, #459, #460	444.5 445.5 449.5 453.1 455.5 456.5 459.5 460.5	22.4.1.1 – Prohibited Subdivision	Amend Rule 22.4.1.1 PR3 (c) to add that a transferable title subdivision in the former Franklin District on a parent Certificate of Title that existed prior to 6 December 1997.	Oppose	For the same reasons provided in submission point 420.1, we oppose the inclusion of any rule prohibiting any form of subdivision.
Heather Perring for BTW 445	445.10	16.4 Subdivision	Add a new controlled activity to Rule 16.4 Subdivision, to facilitate ease of subdivision in new structure planned areas: C1 Subdivision in accordance with an approved structure plan created after 18 July 2018.	Support	Agree with the reasoning proposed for this amendment.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Perry Group Limited 464	464.8	Section C Rules 16.1 3 RD Activities	Delete the minimum lot size from Rule 16.1.3 RD1 (c) Restricted Discretionary Activities AND Add a matter of discretion to Rule 16.1.3 RD1 Restricted Discretionary Activities, to address lot size AND Delete the minimum living court areas and dimensions from Rule 16.1.3 RD1 (h) Restricted Discretionary Activities. AND Add a matter of discretion to Rule 16.1.3 RD1 Restricted Discretionary Activities, to address living court areas and dimensions. AND Amend Rule 16.1.4 D3 Discretionary Activities as follows: Any Multi-unit development that does not comply with Rule 16.1.3 RD1 except for Rules 16.1.3 RD1 (c) and (h). AND Any consequential amendments or further relief to address the concerns raised in the submission.	Support in Part	<p>We support the intent of this provision which is seeking greater flexibility for multi-unit developments</p> <p>We agree that more flexibility is required to enable multi-unit development. I agree with the submitter's comment that the 3000m2 net lot size will not provide for or encourage intensification of an existing urban area or facilitate housing variety. We support greater flexibility in the multi-unit housing rules where they promote more intensive development.</p> <p>The outcomes sought by the submission will ensure variety in the future housing stock to help achieve policies 4.1.2, 4.1.5, 4.2.16 and 4.2.17.</p>
Brendan Balle for Balle Bros Group Limited	466.11	22.1.3 Restricted Discretionary Activities	Retain Rule 22.1.3 RD2 Rural Industry as notified.	Support	We support the restricted discretionary status for Rural Industry as they support rural production activities.
Brendan Balle for Balle Bros Group Limited	466.19	22.3.4.1 Height - Building General	Amend Rule 22.3.4.1 Height – Building General so that the height of any building associated with a farming or rural services activity must not exceed 15m.	Support	We agree that a 10m restriction is not practical for farm sheds/buildings such as those associated with commercial vegetable production. A 15m height restriction would be more realistic.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Brendan Balle for Balle Bros Group Limited	466.20	22.3.6 Building coverage	Delete reference to 500m2 maximum or 2% of site area from Rule 22.3.6 Building coverage.	Support	For the reasons given in submission point 197.24.
Balle Bros Group Limited #466	466.23	22.4.1.1 – Prohibited Subdivision	Delete Rule 22.4.1.1 PR2 and PR3.	Support	We support the deletion of PR2 and PR3 and inclusion of provisions that make these types of subdivision Non-Complying Activities.
Balle Bros Group Limited #466	466.25	Rule 22.4.1.5 Rural Hamlet Subdivision	Amend this rule to restrict hamlets establishing on high class soils except where primary productive use is no longer viable.	Oppose	We oppose this submission point for the reason provided in submission point 123.4.
Balle Bros Group Limited #466	466.27	Rule 22.4.1.6 Conservation Lot Subdivision	Add a new discretionary rule to Rule 22.4.1.6 to allow for transfer of conservation lots.	Support	We are generally supportive of Transferable Lot subdivision which can offer the opportunity to enhance areas with degraded ecological values or protect high-class soils and transfer the ability to subdivide to designated parts of the District where there is capacity for growth. These work well in the Auckland Region and consideration should be given to inclusion within the Plan.
Balle Bros Group 466	466.6	Section C Rules 16.2 1 Earthworks	Delete requirement for 1.5m setback from boundary where effects are mitigated from Rule 16.2.4.1 P1 Earthworks – General.	Support	We agree that this minimum setback is impractical, particularly as section sizes get smaller. It is often necessary to undertake earthworks to create the footings etc. for the foundation which would be within this 1.5m area and trigger resource consent.
Andrew Wood #471	471.15 471.16 471.17	22.4.1.1 – Prohibited Subdivision	Amend 22.4.1.1 PR2(b), (c)(i).	Oppose	For the same reasons provided in submission point 420.1, we oppose the inclusion of any rule prohibiting any form of subdivision.
Andrew Wood for CKL	471.2	22.2.3.1 Earthworks – General	Amend Rule 22.2.3.1 P1 (a)(iv) Earthworks - General, as follows: (iv) A building platform for a residential activity, including accessory buildings and access. AND Any consequential amendments necessary.	Support	It makes sense to include the provision of access within the scope of permitted earthworks for residential building platforms.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Andrew Wood for CKL 471	471.38	Section C Rules 16.2 1 Earthworks	Amend Rule 16.2.4.1 P1 (a)(ii) Earthworks - General, by increasing the allowable volume from 250m3 to 500m3. AND Any consequential amendments necessary.	Support in Part	We agree that the Permitted standard is too low and should be increased.
Andrew Wood for CKL 471	471.39	16.3.2 Minor Dwelling	Amend Rule 16.3.2 P1(a)(i) Minor dwelling, by reducing the net site area requirement from 900m2 to 600m2. AND Any consequential amendments necessary.	Support	This is consistent with our submission. A net site area of 900m2 is too large given the maximum gross floor area of 70m2 for a minor dwelling.
Andrew Wood for CKL 471	471.45	16.4.4 Subdivision Multi-unit development	No specific decision sought, but the submission considers minimum unit size standards (as contained in Rule 16.4.4 Subdivision-Multi unit development) should be a land use requirement. Subdivision around existing or lawfully established units should be enabled.	Support	This is consistent with our submission which seeks to amend the provision to allow subdivision around existing dwellings or in accordance with an approved land use consent.
Andrew Wood for CKL 471	471.50 - 471.56	Section C Rules 16.1 Land use Activities	Activities failing a permitted standard should be a restricted discretionary activity, not a discretionary activity.	Support	Discretionary Activity status is too restrictive for minor infringements listed in submission points 471.50 – 471.56.
Ann-Maree Gladding #489	489.1	22.4.1.1 – Prohibited Subdivision	Amend 22.4.1.1 PR4(a).	Oppose	We oppose the inclusion of Prohibited Subdivision in any form. We agree with the merits of Transferable Rural Lot Right subdivision listed in this submission.
Ann-Maree Gladding	489.16	22.3.7.2 Building setback sensitive land use	Amend Rule 22.3.7.2 P1 (vii) Building setback sensitive land use, to be 300m from the actual intensive farming activity, rather than the boundary of the site. Submission seeks rewording and clarification of the rule.	Support	For the reasons given in submission point 197.29.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Jackie Colliar 493	493.35	Other	Put the District Plan review process on hold so that outcomes of the blueprinting exercise can be accommodated in the District Plan, including the development of structure plans	Oppose	<p>We oppose the submission as it seeks to place the District Plan Review process on hold. Waikato District Council has already withdrawn the Tuakau Structure Plan to align with the Waikato District Plan resulting in a significant delay of live zoning in Tuakau. In addition, the Waikato District jurisdiction operates under two outdated Plans and these Plans need to be merged for consistency.</p> <p>Continual delays of the Plan defer living zoning of land and restrict the ability of the Council to rezone/upzone land to meet the existing development capacity needs.</p> <p>The Blueprint is a non-statutory document which covers a range of issues many of which are not implemented through the District Plan. The document is flexible and adaptive therefore is subject to change over the lifetime of the District Plan.</p> <p>The District Plan is not a fixed document and is subject to change through its lifetime. The Plan Change process allows changes to be made to the Plan.</p> <p>If the Waikato District Council were to continually wait for all other relevant documents to be reviewed/updated/operative the District Plan would never be completed.</p>
Gary McMahan	50.1	23.4.2 General Subdivision	Amend Rule 23.4.2 RD1 (a)(i) General subdivision to reduce the net site area from 5000m ² to 3000m ² .	Support	A reduced minimum lot size will provide more efficient use of the urban land resource and will provide greater flexibility for countryside living developments. The reduced minimum lot size will also provide for a greater range of rural lifestyle living choices.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Lance Vervoort for Hamilton City Council 535	535.32	General plan (structure, numbering, all-of-plan)	Amend the structure of the entire Proposed Plan and include usable cross-referencing between the objectives, policies and rules to enable easier use by the reader. AND Any consequential amendments and/or additional relief required to address the matters raised in the submission.	Support	The Plan needs to identify key objectives and policies for each of the zones and rules to identify the intent of the zone and purpose of the rules. In the current format, it is hard to link the relevant objectives to the relevant activities.
Hamilton City Council #535	535.73	Rule 22.4.1.2.a.ii General Subdivision	Increase Record of Title area to 40ha from 20ha.	Oppose	No reasoning is provided as to why a 40ha requested minimum should apply. The General Subdivision provisions allowing for the creation of a greater number of small rural lots will only provide additional subdivision rights to a limited number of properties in the former Franklin area of the Waikato District. The 20ha minimum is sufficient to maintain the existing rural production activity on the balance and maintain rural character and amenity values.
Murray & Cathy McWatt for Grander Investments Limited	548.15	22.1.5 Discretionary Activities	Delete Rule 22.1.5 D4 Waste Management facilities as a Discretionary Activity; AND Add a new Restricted Discretionary activity for Cleanfill	Support	The submission aligns with the original submission of The Surveying Company.
Mark Chrisp	564.1	23.4.2 General Subdivision	Amend Rule 23.4.2(a)(i) - General Subdivision, as follows: (i) All proposed lots must have a net site area of 3000m ² .	Support	A reduced minimum lot size will provide more efficient use of the urban land resource and will provide greater flexibility for countryside living developments. The reduced minimum lot size will also provide for a greater range of rural lifestyle living choices.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
567 Ngati Tamaoho Trust 798 Ngati Te Ata	567.13 798.29	16.4.14	Add a new condition to Rule 16.4.14 - Subdivision of esplanade reserves and esplanade strips, as follows: must be bordered by park edge roading for safety, environment, amenity and urban design purposes. AND Add an additional provision for Subdivision of esplanade reserves and esplanade strips in all sections of the Proposed District Plan where esplanade reserves are referred to as follows: must be bordered by park edge roading for safety, environment, amenity and urban design purposes.	Oppose in Part	While we agree that safety, environmental, amenity and urban design issues are relevant concerns for esplanade reserves the requirement for these reserves to be bordered by park edge roading would be onerous, economically unfeasible, given the cost of roading, and in some circumstances impractical given topographical and other constraints along river, stream and coastal margins. These issues would better be addressed through matters of discretion or design standards so they can be included where practical and feasible.
Ngati Tamaoho Trust 567	567.3	Section B Objectives and Policies 4.1.1 Objective – Strategic	Add the following clause to all Town Centre Objectives: <i>Natural waterbodies are maintained or enhanced within integrated development for all towns</i>	Oppose in Part	We agree with the maintenance and enhancement of water bodies where it is practical and realistic. Urban infrastructure forms part of the ‘environment’ as defined in the RMA. There are instances where natural water bodies may need to be piped or drained to realise the development potential of urban land. In some instances, the urban environment may take precedence over the natural environment to achieve the best environmental outcome from an urban perspective.
Meridian Energy #580	580.12	Objective 3.2.1	Remove ‘enhancement’ as Part 2 of the RMA does not require enhancement.	Oppose	We oppose the removal of enhancement from Objective 3.2.1. Enhancement, particularly of wetlands and waterways, falls under the umbrella of ‘sustainable management’ – managing the use, development, and protection of natural and physical resources. Enhancement accord with the WRPS, The Vision and Strategy and relevant NPS.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Lucy Roberts for Department of Conservation 585	585.32	General plan (structure, numbering, all-of-plan)	Add introductions and/or zone descriptions at the beginning of each chapter.	Support	Agree with this submission point and the reasons for the decision sought. Descriptions will assist with understanding the purpose and character of the zone and the associated provisions.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Terry Withers 598	598.1	General plan (structure, numbering, all-of-plan)	Defer the hearing of submissions on Stage 1 until after the National Planning Standards have been adopted and/or until completion of both Stage 2 of the Future Proof Strategy and the updated Waikato Regional Policy Statement.	Oppose	<p>We agree the Waikato District Plan should be consistent with the National Planning Standards, however, this should not delay the planning process.</p> <p>We oppose the submission as it seeks to place the District Plan Review process on hold. Waikato District Council has already withdrawn the Tuakau Structure Plan to align with the Waikato District Plan resulting in a significant delay of live zoning in Tuakau. In addition, the Waikato District jurisdiction operates under two outdated Plans and these Plans need to be merged for consistency.</p> <p>Continual delays of the Plan defer living zoning of land and restrict the ability of the Council to rezone/upzone land to meet the existing development capacity needs.</p> <p>The Proposed Waikato District Plan has accommodated for substantial growth through live zoning in identified areas that are consistent with the Future Proof Strategy.</p> <p>The Blueprint is a non-statutory document which covers a range of issues many of which are not implemented through the District Plan. The document is flexible and adaptive therefore is subject to change over the lifetime of the District Plan.</p> <p>The District Plan is not a fixed document and is subject to change through its lifetime. The Plan Change process allows changes to be made to the Plan.</p> <p>If the Waikato District Council were to continually wait for all other relevant documents to be reviewed/updated/operative the District Plan would never be completed.</p> <p>It is typical for Plan processes to occur alongside each other and there is no legislative requirement for one to be completed before the other.</p>

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Greig Metcalfe	602.46	24.1.1 Permitted Activities	Add a new rule to Rule 24.1.1 Permitted Activities for "A new retirement village or alterations to an existing retirement village" and appropriate activity-specific conditions. AND Any consequential amendments and/or additional relief required to address the matters raised in the submission.	Support	Retirement villages are an appropriate land use in the Village Zone. Retirement villages do not feature as a land use activity in the village zone. Given the demand for such facilities, provision should be made for retirement villages in all urban areas, including the village zone.
Greig Metcalfe	602.47	24.2.4.1 Earthworks - General	Delete Rule 24.2.4.1 P1(a)(i) Earthworks - General. AND Delete Rule 24.2.1 P3(a)(iv) Earthworks - General. AND Any consequential amendments and/or additional relief required to address the matters raised in the submission.	Support	Earthworks within 1.5m of a boundary are inevitable and even the most minor activity, such as digging a posthole, would trigger the requirement for resource consent.
Greig Metcalfe	602.48	24.2.4.1 Earthworks - General	Delete Rule 24.2.4.1 NCI Earthworks - General. AND Any consequential amendments and/or additional relief required to address the matters raised in the submission.	Support	The importation of clean fill is provided for as a permitted activity by other rules (P2 and P3).

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Bill Wasley for Future Proof Implementation Committee 606	606.11	General plan (structure, numbering, all-of-plan)	Amend the Proposed District Plan, to allow for higher density and mixed use developments close to transport hubs, especially train stations that have been signalled for potential re-opening, town centres and community hubs, through amendments to the following parts of the Proposed District Plan: Policy 4.1.5 Density Chapter 16 Residential Zone Chapter 17 Business Zone Chapter 18 Business Centre Zone Planning Maps; and Any other relevant chapters.	Support	The proposed zoning addition would encourage housing diversity in close proximity to existing services and infrastructure. Would result in more compact development form to meet the density and growth targets to align with the Future Proof strategy.
Bill Wasley for Future Proof Implementation Committee 606	606.12	General plan (structure, numbering, all-of-plan)	Consider alternatives to live zoning including: Using a Rural Zone with an overlay similar to Hamilton's Urban Expansion overlay Applying an urban zone with an overlay that signals that additional subdivision and development will not be considered until there is certainty about infrastructure provision. A new Urban Expansion Zone with its own suite of provisions for managing land use and subdivision A Future Urban Zone to signal additional land would need to be serviced with infrastructure and structure planned before it is zoned for urban development.	Oppose	<p>Infrastructure provision and development of infrastructure can sit alongside the District Plan. There is no need to identify this staging within the District Plan as properties can be live zoned and developed where infrastructure is available.</p> <p>The Plan objectives and policies within the PWDP are strong enough to restrict development where infrastructure is not available or where approved development is sporadically resulting in unplanned and uncoordinated infrastructure.</p> <p>Live zoning of additional residential land is located around existing Towns that are serviced by infrastructure. While capacity upgrades or additional infrastructure may be required, it is highly likely that these areas will be able to be serviced with infrastructure.</p>

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Vineyard Road Properties Limited	626.2	24.4.1 Subdivision – General	Amend the minimum net site area for general subdivision in the Village Zone to 2000m ² , whether or not the lots are publicly reticulated; AND/OR Amend the Proposed District Plan with any necessary consequential or other relief that addresses these concerns.	Oppose	<p>Where reticulation exists, opportunities for subdivision at a higher density should prevail. A reduced minimum lot size where lots can be reticulated will provide more efficient use of both the land resource and the corresponding available infrastructure.</p> <p>The Village Zone is an urban environment that anticipates low density development. A minimum lot size of 1000m² will continue to maintain open space and achieve the appropriate level of amenity.</p>
Blue Wallace Surveyors Limited 662	662.11	16.4.13	Amend Rule 16.4.13 RD1(a) Subdivision creating reserves as follows: (a) Every reserve, including where a reserve is identified within a structure plan or master plan (other than an esplanade reserve), proposed for vesting as part of the subdivision, must be bordered by roads along at least 50% of its boundaries as much as is practicable...	Support in Part	<p>We agree with the following:</p> <p>This rule seeks to impose a development constraint that may not feasibly be possible or practicable. Reserves should provide access from transportation corridors, on-site variables could mean that a 50% road frontage is not possible, thus defaulting the development to a high order planning assessment. It is understood that this provision is proposed (in part) to enable passive surveillance, however in many instances a 50% road boundary is unrealistic with other design considerations available for Crime Prevention Through Environmental Design principles.</p> <p>However, we believe that the rule should be changed to a matter of discretion rather than a performance standard as the wording proposed by the submitter wouldn't be enforceable as a rule.</p>

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Blue Wallace Surveyors Ltd	662.13	22.2.3.1 Earthworks – General	Retain Rule 22.2.3.1 P3 Earthworks - General, except for the amendments sought below AND Amend Rule 22.2.3.1 P3 (a) Earthworks - General as follows: (a) Earthworks for the purpose of creating a building platform and accessway for residential purposes within a site.	Support	For the reasons given in submission point 471.2.
Blue Wallace Surveyors Ltd #662	662.16 662.17	22.4.1.1 – Prohibited Subdivision	Amend 22.4.1.1 PR2 and PR3 from Prohibited to a Non-Complying activity status.	Support	We support the deletion of PR2 and PR3 and inclusion of provisions that make these types of subdivision Non-Complying Activities.
Federated Farmers of New Zealand	680.183	22.1.2 Permitted Activities	Retain Rule 22.1.2 P11 Equestrian centre, as notified.	Support	Equestrian centres provide for diverse opportunities for businesses reliant on land within the rural zone, which can help to sustain a vibrant rural community and district.
Federated Farmers of New Zealand	680.184	22.1.2 Permitted Activities	Retain Rule 22.1.2 P12 Horse training centre, as notified.	Support	Horse training centres provide for diverse opportunities for businesses reliant on land within the rural zone, which can help to sustain a vibrant rural community and district.
Federated Farmers of New Zealand	680.187	22.1.2 Permitted Activities	Add to Rule 22.1.2 a new permitted activity rule for Intensive farming,	Support in part	The submission generally aligns with the original submission of The Surveying Company. However, further consideration needs to be given to allowing some currently defined 'intensive farming' activities such as free-range farming to be established as permitted activities.
Federated Farmers of New Zealand	680.225	22.3.7.1 Building Setbacks – All boundaries	Retain Rule 22.3.7.1 P1 Building Setbacks – All boundaries, as notified.	Oppose	For the reasons given in our original submission.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Federated Farmers	680.227	22.3.7.1 Building Setbacks – All boundaries	Retain Rule 22.3.7.1 P3 Building Setbacks – All boundaries, as notified.	Oppose	For the reasons given in our original submission.
Federated Farmers of New Zealand #680	680.234	22.4.1.1 – Prohibited Subdivision	Amend 22.4.1.1 PR2 and PR3 from Prohibited to a Discretionary Activity status.	Support	We support this submission point and agree with the submitters reasoning that the absolute nature of this approach is unnecessary and unduly restrictive.
Federated Farmers of NZ #680	680.235	22.4.1 – Rural Subdivision	Inclusion of Boundary Adjustment as a controlled activity with control reserved over area and shape of titles and easements.	Support	We support inclusion of a boundary adjustment provision in the Rural Zone. Providing specifically for boundary adjustments as a controlled status allows for landowners to formalise minor boundary related issues such as buildings across boundaries, aligning boundaries to fence lines etc. with low risk and cost.
Federated Farmers of New Zealand	680.29	Policy 3.1.2(a)	Amend policy to incentivise activities that maintain or enhance biodiversity	Support	We support this submission as it relates to incentivised environmental subdivision for the reasons provided in submission point 794.5
Federated Farmers of New Zealand #680	680.59	Policy 5.2.3 (a) and (b)	Amend part (a) to remove 'use'. Amend part (b) to include both economic and lifestyle options and is managed in a way that ensures rural resources, character and environmental values are maintained. Reference to 'High Class Soils' is removed	Oppose	For part (a)'Use' should be retained within this policy to capture activities that may not fall under the umbrella of development or subdivision, this may include inappropriately located land use activities such as fertiliser storage for example. For part (b) we are also seeking provisions that provide for new areas of indigenous biodiversity and enhancement of existing areas. Granting relief to this submission point as written does not address this matter.
Lucy Stallworthy	69.1	22.3.2 Minor dwelling	Delete the part of Rule 22.3.2 Minor dwelling, requiring minor dwellings to be within 20m of an existing dwelling.	Support	For the reasons given in submission point 14.2.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Sharpe Planning Solutions	695.135	24.3.5 Building coverage	Amend Rule 24.3.5 P1 and P2 to retain the operative district plan building coverage of 10% or 300m ² , whichever is the larger.	Oppose	20% allows greater flexibility in housing choice and built form. Buildings are anticipated for this zone and do not need to be further restricted by reducing the building coverage. 20% building coverage will achieve adequate low density housing opportunities while continuing to provide a sense of open space between properties.
Sharpe Planning Solutions	695.139	24.4.9 Road frontage	Retain the 20m frontage as proposed in Rule 24.4.9 RD1(a) Road frontage .	Oppose	The layout of development is dependent on the size and shape of the site as well as its topography (amongst other constraints). While a 20m minimum width along a road boundary can generally work in many developments that have the ability to follow a grid design, not every site is flat with no size or shape constraints. Sites with topographical natural or physical constraints may be unable to practically implement a layout that achieves 20m road frontage for all lots with the road. There may also be sites where the lay of the land is best suited to an alternative roading design. There is no analysis in the s32 regarding this relevance or practicality of this rule.
Sharp Planning Solutions Ltd 695	695.89	16.3.2 Minor Dwelling	Amend Rule 16.3.2 P1(a)(i) Minor dwelling to apply a 600m ² threshold instead of the current 900m ² requirement.	Support	This is consistent with our submission. A net site area of 900m ² is too large given the maximum gross floor area of 70m ² for a minor dwelling.
Sharp Planning Solution Ltd #695	695.92 695.93	22.4.1.1 – Prohibited Subdivision	No decision sought with respect to PR2 and PR3. Seeks inclusion of Transferable Rural Lot provisions.	Support	We support the inclusion of Transferable Rural Lot Right Provisions. Transferable Rural Lot Right provisions can achieve the protection of versatile soils as is currently occurring in the ‘Pukekohe Hub’. The Auckland Unitary Plan provides an excellent example of this.
WDC 697	697.347	Section A Plan Overview and Strategic Directions Chapter 1: Introduction	Add a stand-alone chapter containing all of the strategic objectives.	Support	We support this submission and agree with the reasons for the decision sought.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Waikato District Council	697.456	22.1 Land Use - Activities	Add new provisions to Chapter 22 (Rural Zone) new provisions for new retirement villages to establish; AND Add provisions for alterations and additions to existing retirement villages as a Restricted Discretionary Activity; AND Add new policies to Chapter 5 Rural Environment to support the proposed provisions.	Support	Retirement Villages play an important part in providing housing options for the elderly in the rural zone. These should be generally anticipated in the rural zone subject to the adverse effects of the proposal being assessed against specific criteria and standards to ensure the suitability of the proposal in that location.
Waikato District Council	697.747	22.1.2 Permitted Activities	Add to Rule 22.1.2 P13 Travellers Accommodation as follows: Travellers Accommodation for up to 5 people.	Support	Travellers' Accommodation has been provided for as a Discretionary Activity for more than 5 people. The amendment makes it clear that the activity is permitted for up to 5 people.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Waikato District Council	697.751	22.1.3 Restricted Discretionary Activities	Add new Rule 22.1.3 RD3 as follows: RD3 A new retirement village or alterations to an existing retirement village	Support in part	<p>For the reasons given in submission point 697.456.</p> <p>However, further consideration needs to be given to the conditions proposed such as “(b) - The site is either serviced by or within 400m walking distance of public transport;”</p> <p>Many of the Waikato District Towns have no public transport and even if a train line passes through the town, there is no service and/station for the residents to use public transport. It is therefore highly unlikely that a rural zoned property will be serviced by or within 400m walking distance of public transport.</p> <p>I seek that the part of the submission to add new provisions for new retirement villages be allowed.</p> <p>I seek that the part of the submission to “be serviced by or within 400m walking distance of public transport” be disallowed.</p>

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Waikato District Council	697.924	23.4.4 Title boundaries – natural hazard area, contaminated land, Significant Amenity Landscape, notable trees, intensive farming activities, aggregate extraction areas	Amend Rule 23.4.4 NC1 Title boundaries - natural hazard area, contaminated land, Significant Amenity Landscape, notable trees, intensive farming activities, aggregate extraction areas to change to D1 a discretionary activity rather than a non complying activity, as follows; NC1 D1 Discretionary activities Title boundaries - natural hazard area, contaminated land, Significant Amenity Landscape, notable trees, intensive farming activities, aggregate extraction areas	Support	The proposed activity status is too onerous for this rule.
Waikato District	697.942	24.1.1 Permitted Activities	Add a new activity to Rule 24.1.1 after P8 for retirement villages.	Support	Retirement villages are an appropriate land use in the Village Zone. Retirement villages do not feature as a land use activity in the village zone. Given the demand for such facilities, provision should be made for retirement villages in all urban areas, including the village zone.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Fraser Graafhuis for Mercury NZ Limited ("Mercury")	730.1 730.2	General plan (structure, numbering, all-of-plan)	Withdraw all Stage 1 of the Proposed Waikato District Plan and re-notify Stage 1 together with Stage 2 once a thorough flood analysis has been undertaken and consulted on. OR Review all of the Stage 1 provisions for urban growth and land use intensification (objectives, policies, methods and rules) in order to manage flood hazard risk at Stage 2 and hear submissions for both stages together. Until a thorough flood hazard assessment has been undertaken and included within the First Schedule process, Mercury opposes the entire Proposed District Plan Stage 1. Mercury reserves its right to comment on any part of the RMA framework, including section 32 analysis, and issues, objectives, policies and methods within any part of the Proposed District Plan during further or later stages. Mercury considers that it is necessary to analyse the results of a flood assessment, which shows areas affected by a 1:100 event prior to designing a policy framework, which includes management controls that avoid, remedy and mitigate significant flood risk in an appropriate manner to ensure there is a tolerable level of risk exposure for all land use and development. Mercury also requires time to peer review any flood assessment information including the assessment of	Oppose	This option would waste rate payer's money. There are enough restrictions within the rules that would restrict development on land within a flood hazard area. s106 of the RMA applies to all resource consents.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Kim Harris-Cottle for New Zealand Transport Agency	742.14 742.15 742.18 and others points opposing live zoning	Maps / Zones	Defer or withdraw the live zoning of new residential, industrial and commercial land in Tuakau from the planning maps until an appropriate structure plan is developed with coordinated sequencing and staging of infrastructure. AND Add a new clause to Policy 4.1.10(a) Policy - Tuakau as follows: (iv) that subdivision use and development in this area is supported by sufficient existing or planned infrastructure. AND Add to Policy 4.1.10 (iii) Policy - Tuakau to include relevant sections of the Tuakau Structure Plan. AND Request any consequential changes necessary to give effect to the relief sought in the submission.	Oppose	<p>Infrastructure provision and development of infrastructure can sit alongside the District Plan. There is no need to stage live zoning within the District Plan as properties can be live zoned and developed where infrastructure is available.</p> <p>Structure Planning and a staged growth approach will delay the provision of land for development.</p> <p>There is a range of non-statutory mechanisms that can be used to determine the provision of infrastructure for live zoned properties.</p> <p>We do not believe that the use of 'future urban' zones or 'urban expansion' overlays are the best option as these result in land banking and inefficiency in land use in the interim period until the land is rezoned through a structure Plan process.</p> <p>Rezoning of land in Tuakau has already been delayed by a Council decision to withdraw the Tuakau Structure Plan. Deferring live zoning to prepare a Structure Plan for Tuakau would further delay live zoning of land, much of which was identified for growth 10 years ago by the Franklin District Growth Strategy.</p> <p>Landowners and developers in Tuakau are experiencing 'consultation burnout' despite 10 years of consultation no additional land has been live zoned. It is inefficient and unsustainable to delay live zoning any further.</p>
Housing New Zealand Corporation 749	749.80	Section C Rules 16.1 3 RD Activities	As outline is summary. Seek less restrictions on multi-unit development to encourage higher density development.	Support in Part	Agree that density standard is not required or should be reduced. Agree that bulk and location standards should be reduced and height increase to encourage more intensive development.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Housing New Zealand Corporation 749	749.81	Section C Rules 16.1 4 D Activities	As outline in summary. Seeking that activities that do not comply with the Permitted Standards become RD activity rather than D activity as proposed.	Support	The default discretionary activity status is too restrictive for minor infringements to standards.
Housing New Zealand Limited 749	749.83	Section C Rules 16.2 1 Earthworks	Changes requested to increase the maximum volume and area in the Permitted earthworks standards 16.2.4.1(P1)	Support	We support the submission as the proposed earthwork standards are too restrictive and will result in unnecessary consenting requirements for small scale works.
Housing New Zealand Corporation 749	749.87	16.3.1 Dwelling	Amend Rule 16.3.1 P1 Dwelling as follows: P1. One dwelling within a site. Up to three dwellings per site. AND Amend Rule 16.3.1 D1 Dwelling to change the activity status to a Restricted Discretionary Activity	Support	We support the submission to allow more than one primary dwelling per site. This is similar to our submission which seeks to allow up to three dwellings as a permitted activity through amendments to the multi-unit housing provisions.
Housing NZ 749	749.94	4.1 Strategic Direction	Amend Objectives and Policies in Section 4.1 Strategic Direction to emphasise: The compact urban development model for concentrating growth in and around existing towns and villages, and Avoid unplanned encroachment into rural land through being contained within defined urban areas to avoid rural residential fragmentation and rural land subdivision. AND Amend the Proposed District Plan as consequential or additional relief as necessary to address the matters raised in the submission as necessary.	Support	Agree with the direction outlined in this submission.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
757 Karen White 757	757.11	16.4.14	The developer of lots 4ha shall be required to provide esplanade facilities that will include as a minimum a 1.8m wide timber edge gravel path walkway and 10% of area landscape planting.	Oppose	<p>The purpose of esplanade reserves and strips is defined in S229 of the RMA. These include:</p> <ul style="list-style-type: none"> • Protection of conservation values; • Public access; • Public recreation use. <p>Therefore public access is not a requirement for all esplanade purposes. The rule proposed by the submitter is therefore too onerous. We support a requirement for the provision of a gravel path, where the esplanade reserve forms part of a public access reserve network or identified trail.</p>
Nicky Hogarth for Holcim (New Zealand) Limited	766.51	22.3.6 Building coverage	Delete Rule 22.3.6 Building Coverage. AND Any additional or consequential relief to give effect to the matters raised in the submission.	Support	For the reasons given in submission point 197.24.
Nicky Hogarth for Holcim (New Zealand) Limited	766.52	22.3.7 Building setbacks	Amend Rule 22.3.7 Building setbacks by reducing the yard separation between sites (other than a road) to 12m or less in all instances. AND Any additional or consequential relief to give effect to the matters raised in the submission.	Support	For the reasons given in submission point 302.28.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Zeala Ltd Aztech Buildings 779	779.1	General plan (structure, numbering, all-of-plan)	Defer the hearing of submissions for Stage 1 of the Proposed District Plan until after adoption of the National Planning Standards and/or post Stage 2 of the reviewed Future Proof Strategy and updated Waikato Regional Policy Statement.	Oppose	<p>We agree the Waikato District Plan should be consistent with the National Planning Standards, however, this should not delay the planning process.</p> <p>We oppose the submission as it seeks to place the District Plan Review process on hold. Waikato District Council has already withdrawn the Tuakau Structure Plan to align with the Waikato District Plan resulting in a significant delay of live zoning in Tuakau. In addition, the Waikato District jurisdiction operates under two outdated Plans and these Plans need to be merged for consistency.</p> <p>Continual delays of the Plan defer living zoning of land and restrict the ability of the Council to rezone/upzone land to meet the existing development capacity needs.</p> <p>The Proposed Waikato District Plan has accommodated for substantial growth through live zoning in identified areas that are consistent with the Future Proof Strategy.</p> <p>The Blueprint is a non-statutory document which covers a range of issues many of which are not implemented through the District Plan. The document is flexible and adaptive therefore is subject to change over the lifetime of the District Plan.</p> <p>The District Plan is not a fixed document and is subject to change through its lifetime. The Plan Change process allows changes to be made to the Plan.</p> <p>If the Waikato District Council were to continually wait for all other relevant documents to be reviewed/updated/operative the District Plan would never be completed.</p> <p>It is typical for Plan processes to occur alongside each other and there is no legislative requirement for one to be completed before the other.</p>

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Middlemiss Farm Holdings Limited #794	794.10	Policy 3.2.8	Inclusion of b) Incentivises in situ subdivision in the Rural Zone where there are significant ecological benefits.	Support	We support this submission as it relates to incentivised environmental subdivision for the reasons provided in submission point 794.5.
Middlemiss Farm Holdings Limited #794	794.15	Add a new policy to Section 5.3	Additional of a new policy supporting environmental enhancement and restoration of ecosystems	Support	We support provisions that provide for incentivised environmental subdivision.
Middlemiss Farm Holdings Limited on behalf of	794.17	22.3.2 Minor dwelling	Delete Rule 22.3.2 P1 (b)(i) Minor dwelling requiring the minor dwelling to be no more than 20m from the main dwelling. AND Amend the Proposed District Plan consequential or additional amendments as necessary to give effect to the submission.	Support	For the reasons given in submission point 14.2.
Middlemiss Farm Holdings Limited #794	794.19	22.4.1.1 – Prohibited Subdivision	Delete Rule 22.4.1.1. Add more enabling provisions for subdivision.	Support	We support the deletion of the Prohibited Subdivision Rule.
Middlemiss Farm Holdings Limited	794.23	Rule 22.4.1.6 Conservation Lot Subdivision	Delete Rule 22.4.1.6 and replace with more enabling provisions.	Support	We are generally supportive of the content of this submission as it relates to incentivised environmental lots as discussed elsewhere in this document.
Middlemiss Farm Holdings Limited #794	794.34	Policy 5.2.3	Amendment to Policy 5.2.3 (b) to include where practical.	Support	We support the proviso attached to (b) 'where practical'. This recognises that while retention of high-class soils and protection of indigenous vegetation are the priority it is not practical in every situation.
Middlemiss Farm Holdings Limited #794	794.4	Objective 3.1.1	Inclusion of b) New areas of indigenous biodiversity area established in the objective.	Support	Including the establishment of new areas of biodiversity accords with the higher order documents.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Middlemiss Farm Holdings Limited #794	794.5	Objective 3.1.1	Inclusion of b) New areas of indigenous biodiversity are established.	Support	We support this submission as it relates to the incentivisation subdivision and biodiversity enhancement in the Waikato District. The enhancement of existing areas and establishment of new areas of indigenous biodiversity accords with the WRPS, The Vision and Strategy and Part 2 of the RMA.
Middlemiss Farm Holdings Limited #794	794.6	Policy 3.1.2	Inclusion of incentivised subdivision.	Support	We support this submission as it relates to incentivised environmental subdivision for the reasons provided in submission point 794.5
Middlemiss Farm Holdings Limited #794	794.8	Policies 3.1.2 Identify and recognise	Inclusion of incentive subdivision for ecological enhancement.	Support	We support this submission as it relates to incentivised environmental subdivision for the reasons provided in submission point 794.5
WRC 81	81.12	General Plan (Structure, numbering, all-of-plan)	Amend the Proposed District Plan to provide for cross references between issues, objectives, policies and rules.	Support	The Plan needs to identify key objectives and policies for each of the zones and rules to identify the intent of the zone and purpose of the rules. In the current format, it is hard to link the relevant objectives to the relevant activities.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
WRC 81	81.14 81.16 81.17 81.85	Section A Plan Overview and Strategic Directions and objectives for the district.	<p>Amend Chapter 1 to show that the requirements of the 2017 National Policy Statement on Urban Capacity (NPS-UDC) have been considered.</p> <p>Amend Chapter 4, Chapter 16, the Planning Maps and any other provisions that are proposed for unserviced urban residential areas where there is uncertainty about the funding, staging and timing for infrastructure provision. The amendments should establish a stronger objective, policy and rule framework than is proposed, in order to ensure that activities of an urban nature, including subdivision, is not provided for prior to structure planning processes being undertaken and without certainty about the funding, timing and staging of infrastructure provision.</p>	Oppose the submission points raised by WRC seeking to defer or delay the live zoning of land.	<p>Infrastructure provision and development of infrastructure can sit alongside the District Plan. There is no need to stage live zoning within the District Plan as properties can be live zoned and developed where infrastructure is available.</p> <p>Structure Planning and a staged growth approach will delay the provision of land for development.</p> <p>There is a range of non-statutory mechanisms that can be used to determine the provision of infrastructure for live zoned properties.</p> <p>We do not believe that the use of 'future urban' zones or 'urban expansion' overlays are the best option as these result in land banking and inefficiency in land use in the interim period until the land is rezoned through a Structure Plan process.</p> <p>Rezoning of land in Tuakau has already been delayed by a Council decision to withdraw the Tuakau Structure Plan. Deferring live zoning to prepare a Structure Plan for Tuakau would further delay live zoning of land, much of which was identified for growth 10 years ago by the Franklin District Growth Strategy.</p> <p>Landowners and developers in Tuakau are experiencing 'consultation burnout' despite 10 years of consultation no additional land has been live zoned. It is inefficient and unsustainable to delay live zoning any further.</p>

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Waikato Regional Council 81	81.149	Section C Rules 16.1 3 RD Activities	Add to Rule 16.1.3 RD 1 A Multi-Unit development a new condition as follows: The development is either serviced by or within 400m walking distance of public transport.	Oppose	Multi-unit development may be suitable in other residential areas other than just 400m walking distance from public transport. For example around schools and park and also encourage throughout the residential zone to provide variety and a choice of living options to the residential zones.
Waikato Regional Council #81	81.167	22.4.1.2.a.ii General Subdivision – Minimum site size	Increase minimum Record of Title to 40ha.	Oppose	No reasoning is provided as to why a 40ha requested minimum should apply. The General Subdivision provisions allowing for the creation of a greater number of small rural lots will only provide additional subdivision rights to a limited number of properties in the former Franklin area of the Waikato District. The 20ha minimum is sufficient to maintain the existing rural production activity on the balance and maintain rural character and amenity values.
Waikato Regional Council #81	81.168	22.4.1.2.a.v General Subdivision – Minimum site size	Require a site specific Landuse Capability Assessment be provided with every property.	Oppose	We oppose the provision of a Land use Capability Assessment for every property subdividing under this rule. Large areas of the District are completely absent of Class 1-3 soils and to provide a Land use Capability Assessment would be a costly and redundant exercise. Discretion over whether a Land use Capability Assessment is required should be determined by Council planning staff at the time an application is lodged.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Waikato Regional Council #81	81.169	22.4.1.2.a.v General Subdivision – Minimum site size	Amend soils split to 90%/10% instead of 80%/20%.	Oppose	<p>Adherence to this blunt rule irrespective what the percentages are will be at the expense of rural character and amenity, farm management and landscape. Site-specific subdivision layout and design which considers the actual operation of the primary production activity, physical features, topography, reverse sensitivity and access should all be considered in the subdivision design and layout.</p> <p>The requirement to retain 90% of the high-class soils within the parent site does not account for sites where there are only small pockets of high-class soil identified. While these areas may be considered to be Class 1-3 based on topography, soil type and climate, these areas may be too small to be used for a wide range of production activities and therefore not versatile – i.e. suitable for a wide range of uses. The presence of high-class soils, their availability to support a wide range of primary production activities should be factored into a substantive assessment together with other considerations for rural subdivision such as landscape. We are of the opinion that consideration of high-class soils is important but are more appropriately addressed through assessment criteria for general subdivision.</p>
Waikato Regional Council #81	81.171	Rule 22.4.1.5 (b) Rural Hamlet Subdivision	Add assessment criteria relating to servicing to promote integration of infrastructure given effect to WRPS Policy 6.3.	Support	We support this submission point.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Waikato Regional Council #81	81.172	Rule 22.4.1.4 Boundary Relocation	Amend Rule 22.4.1.4 to reduce the scope for inappropriate sized subdivision that does not provide a suitable minimum size for rural activities.	Oppose	We oppose the requirement for minimum lot size as specified by this submission point. In our experience boundary relocations are generally specific to the primary production activity on the property and boundary relocations are usually undertaken in support of these activities. Site-specific consideration is preferred over a minimum site size requirement. The amalgamation of lots and the creation of a small rural residential sized lot (.8-1.6ha) also has a positive benefit and potentially increasing the productivity of the balance.
Waikato Regional Council #81	81.173	Rule 22.4.1.5.v Rural Hamlet Subdivision	Amend to provide for a 40ha balance lot.	Oppose	No reasoning is provided as to why a 40ha requested minimum should apply. The 20ha minimum is sufficient to maintain the existing rural production activity on the balance and maintain rural character and amenity values.
WRC 81	81.2 81.121	Section C Rules	Amend each zone chapter to provide details on the purpose and anticipated outcomes of the corresponding zone or subzone.	Support	Agree with this submission point and the reasons for the decision sought. Descriptions will assist with understanding the purpose and character of the zone and the associated provisions.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Waikato Regional Council #81	81.66	22.4.1.1 –Prohibited Subdivision	Retain this rule – prohibited subdivision on the basis it supports WRPS Policy 14.2.	Oppose	A prohibited status is not needed to achieve Policy 14.2 of the WRPS, is unnecessarily restrictive and may result in unintended limitations on the rural production activities. Policy 14.2 seeks to avoid the decline in the availability of high-class soils for primary production due to the inappropriate subdivision, use or development. The strength of the objectives and policies of the Proposed Plan, together with a Non-Complying Activity status will give effect to this Policy. The loss of high-class soils needs to be considered in balance with many other factors such as rural landscape and character, and rural production. Subdivision around existing, established activities such as greenhouses, packing sheds etc. may also be economically enabling for the primary production industry and should not be unnecessarily prohibited, but rather considered on a case by case basis. Prohibiting any subdivision of a lot previously amalgamated for the purpose of a transferable lot subdivision is restrictive well beyond the intent of the Legacy Plan and will result in rural landowners being unable to use boundary relocation as a land management tool. Inclusion of PR4 is completely contrary to the direction of Plan which is to enable rural production.
The Poultry Industry Association of New Zealand; I Brinks NZ Chicken; The Egg Producers Federation of on behalf of	821.16	22.1.2 Permitted Activities	Add a new rule (P13) to Rule 22.1.2 Permitted Activities	Support in part	Further consideration needs to be given to allowing some currently defined ‘intensive farming’ activities such as free-range poultry farming to be established as permitted activities.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Raglan Naturally #831	831.33	22.4.1.1 – Prohibited Subdivision	Add more provisions about food safety to Rule 22.4.1.1 Prohibited Subdivision.	Oppose	Protecting and managing the District’s high-class soil can be achieved by robust objectives and policies, and restrictive activity status. Prohibiting subdivision as proposed, in our experience, often results in unintended consequences which inhibit subdivision that would otherwise merit approval in the context of the objectives and policies of the Plan, high order planning provisions and Part 2 of the RMA.
Mainland Poultry Limited	833.3	22.1.2 Permitted Activities	Add a new rule to Rule 22.1.2 Permitted Activity to provide for Poultry farming as a permitted activity where it can meet the performance standards for permitted farming activities.	Support in part	Further consideration needs to be given to allowing some currently defined ‘intensive farming’ activities such as free-range poultry farming to be established as permitted activities.
Madsen Lawrie Consultant 838.1	838.1	16.3.2 Minor Dwelling	Amend Rule 16.3.2(a)(i) Minor dwelling to reduce the net site area required for a minor dwelling to 600m2.	Support	This is consistent with our submission. A net site area of 900m2 is too large given the maximum gross floor area of 70m2 for a minor dwelling.
Leigh Michael Shaw & Bradley John Hall	877.12 877.13 877.25 877.26 877.27 877.28	22.1.2 Permitted Activities	Amend and add to provisions	Support	The submission aligns with the original submission of The Surveying Company.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Leigh Michael Shaw & Bradley John Hall	877.14 877.29	22.1.3 Restricted Discretionary Activities	Add small scale commercial/retail activities that may be ancillary to rural activities occurring on the site to Rule 22.1.3 Restricted Discretionary Activities. Delete reference to free range poultry farming from Rule 22.1.3 RD1 Restricted Discretionary Activities and add to Permitted Activities and amend/delete setbacks.	Support	The submission aligns with the original submission of The Surveying Company.
Waikato District Health Board 923	923.100	Section A Plan Overview and Strategic Directions Chapter 1: Introduction	Amend Chapter 1 (and/or s32 Analysis) to show the requirements of the 2017 National Policy Statement for Urban Development Capacity have been considered.	Oppose in Part	Infrastructure provision and development of infrastructure can sit alongside the District Plan. There is no need to identify this staging within the District Plan as properties can be live zoned and developed where infrastructure is available.
Waikato District Health Board 923	923.103	Chapter 17 and all Zones	Add zone descriptions and anticipated outcomes	Support	We agree that the purpose of the zones or zone description should be added to the Plan for clarity.
Waikato District Health Board 923	923.91	Section A Plan Overview and Strategic Directions > Chapter 1: Introduction	Amend Chapter 1 to more clearly state the strategic objectives and policies in each policy chapter, and identify how they relate to each other and the issues.	Support	If the strategic objectives are objectives that form part of the planning cascade this need to be clear. The purpose of these objectives needs to be identified as they may not be relevant to all planning applications. We support this submission and agree with the reasons for the decision sought.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
Waikato District Health Board 923	923.93 923.94 923.95 923.96 923.97	Section A Plan Overview and Strategic Directions > Chapter 1: Introduction	Amend Chapter One: Introduction by establishing a stronger objective, policy and rule framework than is proposed for un-serviced urban residential areas where there is uncertainty about the funding, staging and timing for infrastructure provision.	Oppose in Part	<p>We support a stronger objective and policy framework for un-serviced urban residential areas where there is uncertainty about the funding, staging and timing for infrastructure provision. We do not support the deferral of live zoning for residential areas.</p> <p>Infrastructure provision and development of infrastructure can sit alongside the District Plan. There is no need to identify this staging within the District Plan as properties can be live zoned and developed where infrastructure is available.</p>
Waikato District Health Board #938	938.2	Rule 22.4.1.5.v Rural Hamlet Subdivision	Increase Record of Title area to 40ha from 20ha.	Oppose	No reasoning is provided as to why a 40ha requested minimum should apply. The 20ha minimum is sufficient to maintain the existing rural production activity on the balance and maintain rural character and amenity values.
McCracken Surveys Limited	943.15	22.3.2 Minor dwelling	Amend Rule 22.3.2 P1 (a) Minor dwelling, to exclude garages, as follows: (a) One minor dwelling not exceeding 70m2 gross floor area, excluding garage within a lot.	Support	It should be clarified that garages are excluded from the area of a minor dwelling.
McCracken Surveys Limited	943.23	22.2.3.1 Earthworks – General	Amend Rule 22.2.3.1 P1 (a) (iv) Earthworks – General, as follows; (iv) A building platform for a residential activity, including accessory buildings and access.	Support	For the reasons given in submission point 471.2.
McCracken Surveys Limited	943.24	22.2.3.1 Earthworks – General	Delete Rule 22.2.3.1 P2 (a) (iii) Earthworks – General.	Support	Given the definition of “earthworks” in the Proposed Plan, even the most minor activities such as digging a posthole would trigger a requirement for resource consent.

Submitter Name	Submission Point	Relevant Provision	Relief Sought by the Submitter	Support or Oppose	Reasons
McCracken Surveys 943	943.45	Section C Rules 16.1 4 D Activities	As outline is summary. Seeking that activities that do not comply with the Permitted Standards become RD activity rather than D activity as proposed.	Support	The default discretionary activity status is too restrictive for minor infringements to standards.
McCracken Surveys Limited 943	943.47	16.3.2 Minor Dwelling	Amend Rule 16.3.2 (a) (i) Minor dwelling, as follows: (i) The net site area is 600m ² or more;	Support	This is consistent with our submission. A net site area of 900m ² is too large given the maximum gross floor area of 70m ² for a minor dwelling.