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## Further Submissions in support or opposition to submissions on the Proposed Waikato District Plan

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**To:** The Chief Executive  
Waikato District Council  
districtplan@waidc.govt.nz

**Name of submitter:** Van Den Brink Group

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### 1. Introduction

- 1.1. The further submitter makes the following further submissions both in support of and in opposition to submissions to the Proposed Waikato District Plan (PWDP).
- 1.2. The further submitter has an interest in the provisions of the PWDP to which the submissions either supported or opposed relate, and/or in relation to the matters raised by those submissions, **which is greater than the interest that the general public has**, including for the following reasons:
  - (a) The further submitter made submissions on relevant provisions of the PWDP relating to the rezoning of its landholdings in Tuakau;
  - (b) The provisions of the PWDP, zones, and matters at issue in the submissions which are either supported or opposed, including the manner in which those provisions are sought to be amended by other submitters, affect the submitter's interests to an extent that is greater than that of the general public, as a result of the application of those provisions on or adjoining its landholdings and interests; and
  - (c) The further submitter's activities are reliant on the use of land and the roading network, and the carrying out of activities such as subdivision and development (including associated earthworks for these activities) in the respective urban zones proposed in the PWDP, such that various other submissions which are either supported or opposed, including the manner in which they seek retention of (or

amendments to) relevant provisions of the PWDP, affect the submitters' interests to an extent that is greater than that of the general public.

- 1.3. The submissions either supported or opposed by the further submitter are as set out in the **attached** table, identifying particular parts of each submission which is either supported or opposed (by name, submission point number, theme, topic, sub-topic and summary of the relief sought by the relevant submitter which is supported or opposed).
- 1.4. In addition to any specific reasons stated in the attached table (for support or opposition), the further submitter either supports or opposes the relevant submissions for the following general reasons.
- 1.5. In relation to those submissions that are **opposed**, the submissions:
  - (a) Seek changes to the provisions of the PWDP that are unreasonable, inappropriate, and which if adopted would not be appropriate to achieve the purpose of the RMA, nor be effective and efficient and as such appropriate to achieve the objectives of the PWDP, in section 32 terms; and
  - (b) Would result in a planning framework under the PWDP which affects the ability to develop (and redevelop) urban zoned land in an appropriate manner.
- 1.6. In relation to those submissions that are supported, the submissions:
  - (a) Seek the retention of proposed provisions of the PWDP that are reasonable, appropriate, and would better achieve the purpose of the RMA;
  - (b) Seek changes to the provisions of the PWDP that are reasonable, appropriate, and if adopted would better achieve the purpose of the RMA, and/or be more effective and efficient and as such appropriate to achieve the objectives of the PWDP, in section 32 terms; and
  - (c) Would result in a planning framework under the PWDP which supports the ability to develop (and redevelop) urban zoned land in an appropriate manner.
- 1.7. The further submitter seeks that those submissions which are **supported be allowed** (to the extent identified in the attached table and/or as consistent with matters raised in the further submitters' original submission) and that those submissions which are **opposed be disallowed** (in each case to the extent identified in the attached table).

- 1.8. The further submitter wishes to be heard in support of its further submissions.
- 1.9. If others make a similar submission, the further submitter would consider presenting a joint case with them at any hearing.

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Date: 11 July 2019

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