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Would you like to present your submission in person at a hearing?

 Yes I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Attached Documents

File
PWDP Submission ESNZ
Proposed District Plan Notified July 2018

SUBMISSION ON THE PROPOSED WAIKATO DISTRICT PLAN

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

Submitter **EnviroWaste New Zealand Limited**

1. Introduction

- 1.1 EnviroWaste New Zealand Limited (EnviroWaste) is a national waste service provider. EnviroWaste has 55 operating sites throughout New Zealand. Sites include collections depots, materials recovery facilities, transfer stations, cleanfill, landfills and solid and liquid hazardous waste treatment facilities. EnviroWaste operates approximately 550 vehicles and has 900 staff.
- 1.2 Within the Waikato District EnviroWaste owns and operates the Hampton PARRC (Power and Resource Recovery Centre) Landfill. Hampton PARRC Landfill is New Zealand's largest landfill in terms of consented capacity (30,000,000 cubic metres). This site also has a GORE, covered, composting facility consented to process up to 35,000 tonnes per year of organics (green waste and food waste) and a landfill gas to energy (LFGTE) plant comprising seven 1 MW internal combustion/generator units.
- 1.3 This submission relates to aspects of the following parts of the Proposed Waikato District Plan (Proposed Plan):
 - (a) Industrial Zone objectives, policies and rules
 - (b) Urban Subdivision and Development policies
 - (c) Rural Character and Amenity policies and rules
 - (d) National Grid objectives, policies and rules
 - (e) Infrastructure, Subdivision and Development objectives and policies
 - (f) Definitions
 - (g) Transportation activities

2. **Specific Concerns – Industrial Zone**

- 2.1 With respect to the Industrial Zone provisions, EnviroWaste has numerous concerns which are documented in Attachment 1. In general, EnviroWaste is concerned by the proposal to utilise outdated Waikato Section controls in the former Franklin Area, where these are clearly more conservative and less enabling than the provisions of the current Franklin Section. By way of comparison, the adjoining Auckland Unitary Plan provisions are considerably less onerous and more supportive of economic development, employment and industrial development opportunities.
- 2.2 EnviroWaste is concerned that the proposed “Industrial Zone” is significantly more restrictive than the Light Industrial Zone being applied by Auckland Council in Pukekohe, Waiuku and Drury South. Given the immediate proximity of these large industrial areas, there would seem to be no rationale as to why the Waikato District Council (Council) is seeking to restrict the development potential of the Waikato Industrial Zone. The Council is effectively placing industrial zoned land at a competitive disadvantage when compared with Auckland.
- 2.3 The draft Industrial Zone is also less enabling than the existing operative Industrial Zones applied at Tuakau and Pokeno. EnviroWaste considers that the Pokeno provisions provide an example of how the purpose of the Resource Management Act 1991 (the RMA) and Regional Policy Statement considerations are being met, and these are considered to be better in terms of meeting the statutory requirements of the RMA when compared with the Proposed Plan.
- 2.4 The proposed Industrial Zone provisions reflect planning rules which are outdated and less effective and efficient when compared to Industrial Zones applying to the current Franklin Section and other districts where industrial activities are enabled. If the rules for development are too onerous, industrial development and hence employment will simply move to a more enabling industrial zone in Auckland or another region. This does not support economic development, employment and the provision of wellbeing in the Waikato District.

3. **Relief Sought**

- 3.1 Details of the relief sought are set out in **Attachment 1**.
- 3.2 EnviroWaste seeks the following decision from the Council:

- (a) That proposed provisions be amended to address the concerns set out in this submission to ensure ongoing sustainable management of the Waikato District's natural and physical resources and thereby achieving the purpose and principles of the RMA.
 - (b) Any other additional or consequential relief to the Proposed Plan, including but not limited to: the maps, issues, objectives, policies, rules, discretions, assessment criteria and explanations that will fully give effect to the matters raised in this submission.
- 3.3 Suggested relief to deal with the concerns in this submission is set out in **Attachment 1**. However, there may be other methods or relief that are able to address EnviroWaste's concerns and the suggested revisions do not limit the generality of the reasons for this submission.

4. **General Reasons for Relief Sought**

- 4.1 Detailed reasons for EnviroWaste's position are set out in the **Attachment 1**. However, at a general level, for aspects of the Proposed Plan that EnviroWaste supports, they are provisions that:
- (a) Will promote sustainable management of resources, achieve the purpose of the RMA and are not contrary to Part 2 and any other provisions of the RMA;
 - (b) Will enable the social, economic and cultural well-being of the community in the Waikato District;
 - (c) Will meet the reasonably foreseeable needs of future generations; and
 - (d) Represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.
- 4.2 For those provisions of the Proposed Plan that EnviroWaste opposes, those provisions require amendment, as per the relief sought in **Attachment 1**. This is because, without the amendments proposed, the provisions:
- (a) Will not promote sustainable management of resources, will not achieve the purpose of the RMA and are contrary to Part 2 and other provisions of the RMA;
 - (b) Will not enable the social and economic wellbeing of the community in the District;

- (c) Are not adequate to protect and enable EnviroWaste's operations in the District generally;
- (d) Do not have sufficient regard to the efficient use and development of EnviroWaste's assets and of those resources which are dependent on, or benefit from, EnviroWaste's assets and operations; and
- (e) Do not represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means, and do not discharge the Council's duty under section 32 of the RMA.

5. Other

- 5.1 EnviroWaste requests that the Council undertake alternative dispute resolution procedures prior to the hearings on the Proposed Plan, so that the issues underpinning this submission can be better resolved without the need to rely on substantial participation in the formal hearing process.
- 5.2 EnviroWaste wishes to be heard in support of its submission.
- 5.3 If others make a similar submission, the submitter will consider presenting a joint case with them at any hearing.



Jeremy Talbot MNZPI
Consultant Planner
Barker & Associates Limited
8 October 2018

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Attachment 1

Attachment 1: EnviroWaste New Zealand Ltd submission on the Proposed Waikato District Plan

Issue Number	Section of Proposed Plan	Support / Oppose	Relief Sought	Reasons
Planning Maps				
	Planning Maps	Support	Support the identification of new and expanded areas of Industrial Zone throughout the district.	The increase in land zoned Industrial will support economic growth and employment within existing urban areas and/or locations with good transport accessibility.
Section B: Chapter 4.6 – Industrial and Heavy Industrial Zone				
	4.6.2 Policy	Support in part	Support insofar as it gives effect to the relief sought.	The submitter supports the intention of the policy to enable a range of activities; however this is not reflected in the Land Use provisions.
	4.6.3 Policy	Support	Support insofar as it gives effect to the relief sought.	The submitter supports the intention of the policy to enable a sufficient supply of Industrial Zoned land.
	4.6.4 Policy	Support in part	Support insofar as it gives effect to the relief sought.	The submitter supports the intention of the policy to enable ancillary activities related to industrial activities; however this is not reflected in the land use provisions.
	4.6.5 Policy	Support in part	Support insofar as it gives effect to the relief sought.	The submitter supports the intention of the policy to recognise and provide for existing industrial activities; however this is not reflected in the land use provisions.
	4.6.6 Objective	Support in part	Support insofar as it gives effect to the relief sought.	The submitter supports the intention of this objective to manage adverse effects on sensitive activities in other zones and ecosystems; however, the provisions are unnecessarily restrictive and could be modified as per the submitter's relief to achieve the same outcome.
	4.6.7 Policy	Support in part	Support insofar as it gives effect to the relief sought.	The submitter supports the intention of this objective to manage adverse effects on sensitive activities in other zones and ecosystems; however, the provisions are unnecessarily restrictive and could be modified as per the submitter's relief to achieve the same outcome.

Issue Number	Section of Proposed Plan	Support / Oppose	Relief Sought	Reasons
Section B: Chapter 4.7 – Urban Subdivision and Development				
	Policy 4.7.2	Oppose in part	Provide for an exclusion to this Policy for Industrial zones.	Policy 4.7.2 requires subdivision design and layout to adhere to a grid pattern, which enables public viewing for all urban zones; these features are unnecessarily restrictive for industrial development. As industrial areas are generally of a “lower amenity’ than town centre or residential areas, and subject to less pedestrian thoroughfare, there is no reason to require industrial areas to adhere to the same amenity standards as residential and other higher amenity zones.
	Policy 4.7.5	Oppose in part	Provide an exclusion to this Policy for Industrial zones for provision of cycleways/pedestrian connections.	As Industrial areas are subject to less pedestrian thoroughfare or recreational cyclist facilities, there is no reason to require industrial areas to adhere to the same amenity standards as residential and higher amenity zones.
	Policy 4.7.7	Support	Policy (a) supports maximising yield for subdivision. The submitter supports this intent to the extent that the industrial lot sizes are retained or reduced.	The proposed lot sizes are considered as a minimum for the efficient use of land designated for industrial activities, whilst enabling provision for industrial subdivision. The policy in its current form would also support a reduction in the average or minimum lot size.
	Policy 4.7.9	Oppose in part	Provide an exclusion to this Policy for Industrial zones for provision of cycleways/pedestrian connections.	As Industrial areas are subject to less pedestrian thoroughfare or recreational cyclist facilities, there is no reason to require industrial areas to adhere to the same amenity standards as residential and higher amenity zones.
	Policy 4.7.10	Oppose in part	Provide for an exclusion to this Policy for Industrial zones for provision of cycleways/pedestrian connections.	As Industrial areas are subject to less pedestrian thoroughfare or recreational cyclist facilities, there is no reason to require industrial areas to adhere to the same amenity standards as residential and higher amenity zones.
Section B: Chapter 5.3 – Rural Character and Amenity				
	Policy 5.3.3 (b)	Oppose in part	Insert provision for industrial and commercial activities where effects on rural character can be mitigated.	It is appropriate that provision is made for industrial and commercial activities in rural areas where their effects can be appropriately managed.

Issue Number	Section of Proposed Plan	Support / Oppose	Relief Sought	Reasons
	Policy 5.3.13 (b)	Support in part	Provide for waste management facilities that may not be completely compatible with the rural environment.	It is difficult for waste management facilities to be compatible with rural environments, however rural land acts as an effective buffer for their effects, which should be acknowledged by the policy.
Section B: Chapter 6.2 – National Grid				
	Objective 6.2.1	Support in part / Oppose in part	Support insofar as it gives effect to the submitters sought relief.	The submitter supports the intention of the objective to recognise and provide for protection of the National Grid – however, the provisions relating to the National Grid “yard” are too restrictive and should be amended as per the relief sought under the Chapter 14.4 provisions.
	Policies 6.2.2-6.2.6	Support in part / Oppose in part	Support insofar as it gives effect to the submitters sought relief.	The submitter supports the intention of the policies to recognise and provide for protection of the National Grid – however, the provisions relating to the National Grid “yard” are too restrictive and should be amended as per the relief sought under the Chapter 14.4 provisions.
Section B: Chapter 6.4 – Infrastructure, Subdivision and Development				
	Objective 6.4.1	Support in part / Oppose in part	Support insofar as it gives effect to the submitters sought relief.	The submitter supports the intention of the objective, subject to the relief sought elsewhere in this submission.
	Policy 6.4.5	Oppose	Provide for an exclusion to (i) and (ii) for Industrial zones.	As Industrial areas are subject to less pedestrian thoroughfare or recreational cyclist facilities, there is no reason to require industrial areas to adhere to the same amenity standards as residential and higher amenity zones.
Section C: Chapter 13 – Definitions				
	“Clean Fill Material”	Oppose	The submitter requests that the cleanfill definition in the plan be consistent with the cleanfill material definition in the WasteMINZ Technical Guidelines for Disposal to Land.	For consistency. The definition from the technical guidelines is: Clean Fill Material Virgin excavated natural materials (VENM) such as clay, soil and rock that are free of: · combustible, putrescible, degradable or leachable components;

Issue Number	Section of Proposed Plan	Support / Oppose	Relief Sought	Reasons
				<ul style="list-style-type: none"> · hazardous substances or materials (such as municipal solid waste) likely to create leachate by means of biological breakdown; · products or materials derived from hazardous waste treatment, stabilisation or disposal practices; · materials such as medical and veterinary waste, asbestos, or radioactive substances that may present a risk to human health if excavated; · contaminated soil and other contaminated materials; and · liquid waste. <p>When discharged to the environment, clean fill material will not have a detectable effect relative to the background.</p>
	"National Grid Yard"	Oppose in part	The submitter requests that the yard setbacks be reduced to align with the decisions on appeals and consent orders on the Auckland Unitary Plan and the current Auckland Unitary Plan rules,	<p>The Overlay and its provisions should reflect the minimums allowed under the Auckland Unitary Plan, whereby the "Yard" is measured at 12m in any direction from the outer edge of a National Grid support structure and 12 metres either side of the centreline of any overhead National Grid line (rather than up to 37m either side of transmission lines for 220kv lines under the Proposed Plan).</p> <p>There is no reason for the Waikato District Plan to have a wider restriction buffer than Auckland (when the effect on the National Grid would be the same regardless of Region and cognisant that the Auckland rules apply immediately adjoining the submitter's site). As Auckland has the most recent caselaw on the National Grid network through the Auckland Unitary Plan appeals process, it is not unreasonable to consider that its provisions are suitable to meet the NPS for Electricity Transmission.</p>

Issue Number	Section of Proposed Plan	Support / Oppose	Relief Sought	Reasons
Section C: Chapter 14.4 – National Grid				
	Rules 14.4.1 – 14.4.4	Oppose in part	The submitter requests that the yard setbacks be reduced to align with decisions on appeals and consent orders on the Auckland Unitary Plan. The current Auckland Unitary Plan rules, and that those activities within the “yard” allow for car parking or hard stand surfaces (and associated drainage) with limited storage height, on Industrial zoned land rather than the current proposed provisions which sterilise large tracts of industrial zone land from use for any activities.	<p>The Overlay and its provisions should reflect the minimums allowed under the Auckland Unitary Plan, whereby the “Yard” is measured at 12m in any direction from the outer edge of a National Grid support structure and 12 metres either side of the centreline of any overhead National Grid line (rather than up to 37m either side of transmission lines for 220kv lines under the Proposed Plan).</p> <p>There is no reason for the Waikato District Plan to have a wider restriction buffer than Auckland (when the effect on the National Grid would be the same regardless of Region and cognisant that the Auckland rules apply immediately adjoining the submitter’s site). As Auckland has the most recent caselaw on the National Grid network through the Auckland Unitary Plan appeals process, it is not unreasonable to consider that its provisions are suitable to meet the National Policy Statement for Electricity Transmission.</p>
Section C: Chapter 14.12 – Transportation				
	14.12.1 – Permitted Activities	Oppose	Delete P4 (e) in its entirety.	The applicant is concerned at the traffic generation threshold allowable for the Light Industrial Zone, being “Maximum 250 vehicle movements per day and no more than 15% of these vehicle movements are heavy vehicle movements”. The Industrial zones are characterised by heavy vehicle movements and to limit these to only 15% of the trip generations are unnecessarily restrictive on industrial operations. Furthermore the objectives and policies contained in Chapter 6.5 do not support this restriction on transportation.

Issue Number	Section of Proposed Plan	Support / Oppose	Relief Sought	Reasons
Section C: Chapter 20 – Industrial Zones				
	Rule 20.1.1 Permitted Activities	Oppose in Part	<p>To have as a minimum, the following included as Permitted Activities:</p> <ul style="list-style-type: none"> Hire Centres Wholesale Trade Supply outlet Transport depot Garden Centres Retailing of agricultural and industrial motor vehicles and machinery Processing, storage, distribution and sale (wholesale or retail) of aggregates 	<p>Under the Proposed Plan there is no activity distinction between those activities provided for in the Heavy Industrial Zone and the Industrial Zone whereby the listed permitted activities are the same. This is inconsistent with Policy 4.6.2 which seeks to provide for “different functions” within the zones, but also a “range of activities”. The range of permitted activities is too constrained and does not take into account activities which are more land intensive and of a lower amenity value, which should be located an Industrial Zone rather than the Business Zone (where they are otherwise provided for as “commercial activities”).</p> <p>Furthermore, the area of Business Zoned land nearby in the vicinity of Pokeno, where such activities could locate, is very limited (only around the Town Centre) and in close proximity to more services areas (i.e. residential).</p> <p>These activities could reasonably locate in an Industrial Zone (and not be incompatible with surrounding activities). Currently they are not considered in P1-P6, under rule 20.1.1 and unless specifically provided for would therefore default to a Non-Complying Activity (under NC1).</p>
	Rule 20.1.1 Permitted Activities	Oppose	Delete any restriction on gross floor area and the rule amended to allow for any office which is ancillary to a permitted activity.	There is no reason to arbitrarily restrict offices associated with permitted activities where these support the efficient and effective operation of a permitted activity.
	Rule 20.1.1 Permitted Activities	Oppose	Insert as a permitted activity, the construction of a building for any permitted activity (which complies with the development controls).	The activity status of buildings is unclear; the amendment is needed to clarify the activity status.

Issue Number	Section of Proposed Plan	Support / Oppose	Relief Sought	Reasons
	20.2.1 – Servicing and hours of operation	Oppose	Delete in its entirety.	This control is without precedent and represents a restrictive and inappropriate regime.
	20.2.2 – Landscape Planting	Oppose	Modify the Controlled Activity requirement for landscape planting to be a Permitted Activity instead.	This control is without precedent and represents a restrictive and inappropriate regime.
	20.2.2(b) – Landscape Planting	Oppose	Delete in its entirety.	This control creates a mandatory requirement for planting of streams irrespective of what the proposal is (for example a car parking shortfall) and without any consideration of the costs associated with the rule).
	20.2.3	Support	Retain the noise standards of the Proposed Plan.	The control is appropriate in managing effects between zones.
	20.2.4 – Glare and Artificial Light Spill	Oppose in Part	Insert an exclusion for this rule so that it does not apply between sites in the Industrial Zones	The submitter seeks that these rules should only apply to sites adjoining a residential, reserve or countryside living zone (similar to the landscape screening and lower noise limits) and should not be applicable between Industrial sites.
	20.2.2.5.1 - Earthworks	Support	Retain the earthworks standards of the Proposed Plan.	The control is appropriate in managing effects.
	20.2.7.1 Signs P2(a)	Oppose in Part	Insert clarification that (a) applies to free standing signs only.	There is no valid reason to restrict signage of buildings to the criteria in (a).
	20.2.7.1 Signs P2	Oppose in Part	As minimum the signage rules should be increased to allow for 10m2 per site.	The signage rules are unnecessarily restrictive in terms of free standing sign size being limited to one sign per site at 3m2. This does not take into account the use of a site for more than one activity and combined with the allowance for all other signs to be 1 m2 would create more visual clutter than allowing a larger free standing in the first instance.
	20.2.7.2 – Signs Effects on traffic	Oppose in Part	Specify that Rule 20.2.7.2 does not apply to site identification signs.	It is unclear what is meant by “any sign directed at road users” - arguably any sign for identification of a business could be deemed to be directed at road user – however effects

Issue Number	Section of Proposed Plan	Support / Oppose	Relief Sought	Reasons
				associated with identification signed are already managed by rule 20.2.7.1.
	20.2.8 Outdoor Storage of goods for material	Oppose	Delete clause (iv).	The submitter opposes any restriction on the percentage of the site allowable to be used for storage and this should be deleted, as storage activities are permitted. Any visual effects associated with outdoor storage are already mitigated by the maximum height, setback and screening requirements contained in this rule.
	20.3.1 – Building Height	Support in Part	Retain 15m as the maximum height or greater.	A height of 15m is similar to that which has already started to develop/establish in the Pokeno Light Industrial 2 Zone, and there is no reason for this height to be decreased. The submitter would support an increase in height.
	20.3.3 – Daylight Admission	Oppose	Increase height from 2.5 to 3m AND specifically exclude roads from any daylight admission plane.	<p>There is no justification to reduce the height to boundary recession plane, to a height which is lower than the previous Franklin provisions when the maximum heights have been kept the same.</p> <p>There is no reason to apply a daylight recession plane against roads in the Industrial Zones as these areas are generally of a lower amenity and less have pedestrian traffic, therefore there is no reason to apply a daylight restriction against the road network.</p>
	20.3.4.1 – Building setback	Support in Part	Retain as a maximum a front yard setback of 5m (which should not be increased), and that (ii) does not apply to boundaries of other industrial zone sites.	<p>A front yard setback of 5m is similar to that which has already started to develop/establish in the Pokeno Light Industrial 2 Zone, and there is no reason for setback to be increased. The submitter would support a decrease in setback.</p> <p>The submitter supports the provisions for side yards to only apply to zones other than the Industrial and Heavy Industrial Zones – this is also backed up with the daylight provisions which also do not apply to adjoining industrial zoned sites</p>

Issue Number	Section of Proposed Plan	Support / Oppose	Relief Sought	Reasons
	20.3.4.1 (ii) – Building setback	Oppose	Reduce setback between sites with other zones to 3m.	There is no justification to increase the yard setbacks between the Industrial Zones and other zones to 7.5m, when the previous Franklin provisions were more permissive. The 3m landscape buffer is sufficient, and there is no reason to have an additional 4.5m of building setback.
	20.4.1(a) – Subdivision General	Support	Support minimum lot size of 1000m ² and average of 2000m ²	The proposed lot sizes are considered an efficient use of land for industrial activities. The submitter would also support a decrease in minimum area and average.
	20.4.1(a) – Subdivision General	Oppose	20% restriction on creation of rear lots is deleted.	<p>The 20% restriction on rear sites creation results in inefficiencies of land resources (which are already scarce), as it will significantly reduce the amount of land available for industrial activities (and other similar uses).</p> <p>Furthermore as these types of areas are generally of a “lower amenity” than town centre or residential areas, and subject to less (if any) pedestrian thoroughfare, there is no reason to restrict the number of rear lots created via subdivision.</p>
Section C: Chapter 22.3 Rural Zone				
	Rule 22.2.1.1 – Noise – General	Support	Adopt the standards for noise.	Standards are appropriate for noise in the Rural Zone.
	Rule 22.2.1.3 – Noise – Construction	Support	Adopt the standards for construction noise.	Standards are appropriate for construction noise.
	22.3 Land Use – Building	Oppose	Make non-residential buildings or structures a permitted activity outside Landscape and Natural Character Areas.	The Operative Plan provides for non-residential buildings as a permitted activity in the Rural zone. The proposed plan should include the same provision to ensure farm buildings and similar structures are provided for.
	Rule 22.3.4.1	Support	Adopt the standards for building height.	Standards are appropriate for building height in the Rural Zone.

Issue Number	Section of Proposed Plan	Support / Oppose	Relief Sought	Reasons
	Rule 22.3.6 – Building Coverage	Oppose	Delete Rule 22.3.6.	A restriction on building coverage and particularly one as low as the proposed 500m ² , is not consistent with a working rural environment which requires storage sheds, hay barns, milking sheds and dwellings etc. This rule should be deleted entirely.
	Rule 22.3.7 – Yard Setbacks	Oppose	The yard separation between sites (other than a road) should be reduced to 12m or less in all instances.	The submitter opposes the yard setbacks (of up to 22m) as they are too onerous. Setbacks could be reduced and still achieve sufficient separation between activities – and maintain an open landscape character.
	Rules 22.4 - Subdivision	Oppose	In all rules the submitter seeks to have the arbitrary title date deleted.	There is no justification to have an arbitrary title date for further subdivision or boundary adjustments. Potential fragmentation issues can be dealt via other less arbitrary mechanisms.
	Rule 22.4.1.1 – Prohibited Subdivision	Oppose	Delete Rule 22.4.1.1 – there should be no prohibited activity subdivisions.	The submitter also seeks that there be no prohibited subdivision activities. Effects on soil classification can be managed in other ways (i.e. objectives and policies) which are far more consistent with an “effects based” approach to resource management.
	Rule 22.4.1.6 – Conservation Lot Subdivision	Oppose	Amend Rule 22.4.1.6 to take into account enhancement planting for the total area to be protected.	The submitter considers that there is a significant environmental benefit to be obtained from enhancement planting, particularly to “join up” areas of SEA (and other non-identified features).

From: consultant2
Sent: 8 Feb 2019 17:22:45 +1300
To: Sandra Kelly
Subject: FW: PWDP - Submission 302 Query

Could you please save this somewhere? It was just clarifying for submission 302 whether he was seeking to amend or retain the objectives and policy

From: Jeremy Talbot [mailto:Jeremyt@barker.co.nz]
Sent: Friday, 8 February 2019 5:10 p.m.
To: consultant2
Subject: PWDP - Submission 302 Query

Hi – as discussed I have reviewed the submission with respect to the following points:

4.6.6 Objective	Support in part	Support insofar as it gives effect to the relief sought.	The submitter supports the intention of this objective to manage adverse effects on sensitive activities in other zones and ecosystems; however, the provisions are unnecessarily restrictive and could be modified as per the submitter’s relief to achieve the same outcome.
4.6.7 Policy	Support in part	Support insofar as it gives effect to the relief sought.	The submitter supports the intention of this objective to manage adverse effects on sensitive activities in other zones and ecosystems; however, the provisions are unnecessarily restrictive and could be modified as per the submitter’s relief to achieve the same outcome.

I confirm that the provisions should be retained so regard can be given to sensitive activities and environments. But the rules should be amended to make the provisions less restrictive for the development of industrial land as outlined in the submission points on Section C: Chapter 20 – Industrial Zones.

Thanks

Jeremy Talbot
Senior Planner
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