

SUMMARY of SUBMISSIONS

Plan Change 20: Rural Subdivision



Publicly Notified 26 March 2009



1. INTRODUCTION

This document, Summary of Submissions, summarises the decisions requested or inferred for each submission received on proposed Plan Change 20. Where no decision has been specifically requested, Council Officers have where possible, inferred the decision requested from the text of the submission.

Proposed Plan Change 20 was publicly notified on 10 January 2009 with the period for submissions for closing on 27 February 2009.

A total of 62 submissions were received in relation to proposed Plan Change 20 and this report provides a summary of those submissions, in accordance with Clause 7 of the First Schedule of the Resource Management Act 1991.

This report provides the names and addresses of submitters so that they may be served a copy of further submissions.

Copies of the full submissions can be inspected at the following locations during opening hours:
during opening hours:

- Horowhenua District Council – 126 Oxford Street, Levin
- Foxton Customer Service Centre – Main Street, Foxton
- Horowhenua Public Libraries – Levin, Foxton & Shannon
- Tokomaru Store – 2 Tokomaru Road, Tokomaru

The full submissions can also be viewed or downloaded from the Council website www.horowhenua.govt.nz.

2. FURTHER SUBMISSIONS

Any person may make a Further Submission on proposed Plan Change 20, however, in accordance with Clause 8 of the First Schedule of the Resource Management Act 1991, Further Submissions may only support or oppose those submissions already made. In supporting or opposing a submission, a Further Submission may provide reasons for supporting or opposing, however, only issues that are related to those that have already been identified in a submission may be raised.

Any Further Submission should be made on Form 6 of the Resource Management (Forms, Fees, Procedures) Regs 2003 or closely follow this format. Failure to include all the necessary information or complete the form correctly may prevent the Further Submission from being able to be considered. Form 6 Further Submission forms can be obtained from the Council Service Centres and Public libraries listed earlier or downloaded from the Council website www.horowhenua.govt.nz.

Further Submissions must be in writing and be received by the Horowhenua District before **5:00 pm on Friday 27 April 2009**. Further Submissions can be

Delivered to: Horowhenua District Council,
126 Oxford Street, Levin

Posted to: Chief Executive, Horowhenua District
Council, Private Bag 4002, Levin 5540

Faxed to: (06) 366 0983

Emailed to: districtplan@horowhenua.govt.nz

Any person making a Further Submission on proposed Plan Change 20 is required by law to serve a copy of it to the person who made the original submission to which the Further Submission relates within five (5) working days of serving the Further Submission to the Horowhenua District Council.

Section 5 of this Report provides the address for service for each person or organisation that has made a submission on proposed Plan Change 20.

3. PROCESS FROM HERE

The current process of public notification and calling for submissions and further submissions is part of the statutory consultation process required to be undertaken for any plan change.

Once the Further Submission period has closed (27 April 2009), a Planning Report identifying and summarising all submissions will be produced. This Planning Report will provide an impartial assessment of the merits of the Submissions, including whether the issues are valid under the relevant legislation. The Planning Report may also contain any recommended amendment to the proposed Plan Changes to address matters raised by submitters.

Before a formal Council hearing is held, a Pre-hearing meeting may be held where Council Officer's consider that such a meeting would help clarify, mediate or facilitate a resolution on any matters raised in the submissions.

The Planning Report will be circulated to all submitters and further submitters in advance of the formal Council hearing.

At least 10 working days notice will be given of the hearing date.

Anyone can attend the Council hearing, however only those submitters who have indicated that they wish to be heard will have the opportunity to speak about the matters raised in their submission at the hearing, or they can nominate a representative or consultant to speak on their behalf.

The Hearings Committee will consider all relevant matters before making a recommendation to Council for a decision.

All submitters will receive notice of the decision on the Plan Change and the reasons for why the decision was made. The Council will also publicly notify the decision.

Any submitter who is not satisfied with the decision can lodge an appeal with the Environment Court.

4. ADDITIONAL INFORMATION

The Council Planning staff are able to provide additional information on making a Further Submission or the Plan Change process. Additional information including the Plan Change documents, is available from the Council website (www.horowhenua.govt.nz).

5. SUBMITTERS

The following table provides the names and addresses for service of all those who made a submission in relation to proposed Plan Change 20. The purpose of this table is to enable any person who makes a Further Submission on Plan Change 20 to meet the requirements of the law and send a copy of their Further Submission to the person who made the original submission that they have made a Further Submission on, within 5 working days of submitting their Further Submission to the Horowhenua District Council.

Submission Number	Submitter Name	Address for Service	To be Heard
20/001	New Zealand Historic Places Trust/Pouhere Taonga	Rakesh Mistry Heritage Advisor- Planning New Zealand Historic Places Trust <i>Pouhere Taonga</i> PO Box 19173 Wellington	Yes
20/002	Te Mauri O Rangitaane O Manawatu	Paul Horton Environmental Officer Te Mauri O Rangitaane O Manawatu PO Box 1341 Palmerston North	Yes
20/003	Gervasio Lavo	266 Gladstone Road RD1 Levin	Yes
20/004	Steve & Maree Grant	PO Box 29 Manakau 5541	No
20/005	Bernard Cammack & Ann Evans	135 Renown Road Raumati South 5032	No

Submission Number	Submitter Name	Address for Service	To be Heard
20/006	Vector	Darryl McMillan Vector Private Bag 2020 New Plymouth	Yes
20/007	Matthew Hoggard	11a Churchill Street Kaikoura 7300	Yes
20/008	Bruce Jenkins	69a Chamberlain Road Karori Wellington 6012	No
20/009	G & E Williams Consultants Ltd	RD 1 Otaki	Yes
20/010	Richard Walker	RD 31 Manakau Levin 5573	Yes
20/011	Mrs Irene Walker	RD 31 Waikawa Beach Levin 5573	No
20/012	Alan Prentice	21 James Street Waikawa Beach RD 31 Levin 5573	Yes
20/013	Mr William Masters	9 Grimsby Grove Wainuiomata Lower Hutt 5014	Yes
20/014	Walter Dalglish	6 Waipuna Grove RD 1 Levin 5571	Yes
20/015	Horowhenua District Council	David McCorkindale Horowhenua District Council Private Bag 4002 Levin 5540	Yes

Submission Number	Submitter Name	Address for Service	To be Heard
20/016	Fish & Game New Zealand	PJ Teal Regional Manager Fish & Game New Zealand PO Box 1325 Palmerston North 4440	Yes
20/017	Matthew Walker	5 Shannon Street Mt Victoria Wellington	No
20/018	Lesley-Anne Walker	RD 31 Manakau Levin 5573	Yes
20/019	Cameron Walker	183 Buckley Road Melrose Wellington 6023	No
20/020	Mandy Cumming	362 Hokio Sand Road Levin 5571	Yes
20/021	Higgins Group Holdings Ltd	Richard Barton Environment Manager Higgins Group Holdings Ltd Private Bag 11411 Palmerston North 4442	Yes
20/022	Waikawa Beach Ratepayers Association	Erica Wyatt Waikawa Beach Ratepayers Association 24 Manga-Pirau Street RD 31 Levin 5573	Yes
20/023	Pauline Masters	43 Papaitonga Lake Road RD 20 Levin 5570	Yes

Submission Number	Submitter Name	Address for Service	To be Heard
20/024	Department of Conservation	Community Relations Officer Planning Department of Conservation PO Box 5086 Wellington 6145	Yes
20/025	Barry Brown	21 Sarah Street Waikawa Beach RD 31 Levin	Yes
20/026	Francee Thompson	7a Shannon Street Mt Victoria Wellington 6011	No
20/027	Solari Products	Colin Kay Solari Products 140 Aorang Road RD 5 Feilding	Yes
20/028	Syd D'Ath	18 Te Whanga Road RD 12 Levin 5572	Yes
20/029	Barbara Wilson	24 Te Whanga Road RD 12 Levin 5572	Yes
20/030	Elizabeth McCabe	33 Mokena Kohere Street Manakau RD 31 Levin 5573	No
20/031	Jeremy Miles	33 Mokena Kohere Street Manakau RD 31 Levin 5573	Yes

Submission Number	Submitter Name	Address for Service	To be Heard
20/032	Transpower New Zealand Ltd.	Jenna Fincham Burton Planning Consultants Ltd PO Box 33 817 Takapuna North Shore City 0740 Auckland	Yes
20/033	Lakeview Farm Ltd	Peter Everton Lakeview Farm Ltd PO Box 1012 Levin 5540	Yes
20/034	Palliser Farm Estates Ltd	Sydney Agar Palliser Farms Estates Ltd PO Box 117 Otaki	Yes
20/035	Horowhenua District Council	Sue Graham Horowhenua District Council Private Bag 4002 Levin 5540	No
20/036	Louise Miles	PO Box 2058 Wellington 6140	Yes
20/037	Horowhenua District Growers Association	George Sue Horowhenua District Growers Association PO Box 1113 Levin 5540	Yes
20/038	New Zealand Railways Corporation	Megan Fenney New Zealand Railways Corporation PO Box 593 Wellington 6140	Yes
20/039	Barry Smith	36 Manga-Pirau Street RD 31 Levin 5573	No

Submission Number	Submitter Name	Address for Service	To be Heard
20/040	Tarrant Trust	Peter McKenzie Tarrant Trust 472 State Highway 1 Ohau RD 20 Levin 5570	Yes
20/041	John Martin	48 Martins Road Manakau RD 31 Levin 5573	Yes
20/042	Truebridge Associates	Roger Truebridge Truebridge Associates 522 Queen Street Levin 5510	Yes
20/043	Marilyn Blenkhorn	81 Lindsay Road Levin 5510	No
20/044	New Zealand Fire Service Commission	Richard Williams Beca Carter Hollings & Ferner Ltd PO Box 3942 Wellington 6140	Yes
20/045	Mr & Mrs Astwood	Lucy Cooper Lendrums PO Box 40-083 Upper Hutt 5140	Yes
20/046	Judy Keall	1 Ihaka Hakuene Street Manakau RD 31 Levin 5573	Yes

Submission Number	Submitter Name	Address for Service	To be Heard
20/047	Horticulture New Zealand	Chris Keenan Manager: Resource Management & Environment Horticulture New Zealand PO Box 10-232 Wellington	Yes
20/048	MC ² Group Ltd	Mike Mackiggan Landlink Ltd PO Box 370 Waikanae 6454	Yes
20/049	Landlink Ltd	Mike Mackiggan Landlink Ltd PO Box 370 Waikanae 6454	Yes
20/050	Colyer Mair Assets Ltd	Phil Hocquard Lowe Corporation Ltd PO Box 444 Hastings 4156	Yes
20/051	Horizons Regional Council	Greg Carlyon Horizons Regional Council Private Bag 11025 Manawatu Mail Centre Palmerston North 4442	Yes
20/052	Pritchard Group Ltd	Bryce Holmes Pritchard Group Ltd 20 Addington Road RD 1 Otaki	Yes
20/053	Graham Halstead	PO Box 28 035 Wellington 6150	Yes

Submission Number	Submitter Name	Address for Service	To be Heard
20/054	FRP Investments Ltd & FRP Agriculture Ltd	Paul Thomas Environmental Management Services Ltd PO Box 29024 Wellington	Yes
20/055	Nathan Masters	9 Farnham Street Mornington Wellington	Yes
20/056	Woodhaven Gardens Ltd	John Clarke Woodhaven Gardens Ltd 44 Joblins Road RD 1 Levin 5571	No
20/057	B J O'Grady	Rhys Phillips/Alastair Seyb Cardno TCB PO Box 13142 Johnsonville Wellington 6440	Yes
20/058	Federated Farmers of New Zealand	Melissa Jessen Federated Farmers of New Zealand PO Box 715 Wellington	Yes
20/059	Coastal Lakes Station: Graham Sexton & Family	Nathan Baker Tonkin & Taylor Ltd PO Box 2083 Wellington	Yes
20/060	Rangeview Ltd and MJ Page	365 Manakau North Road RD 31 Levin	Yes

Submission Number	Submitter Name	Address for Service	To be Heard
20/061	New Zealand Pork	E McGruddy Environment Officer New Zealand Pork IFNHH Massey University Private Bag 11 222 Palmerston North	Yes
20/062	John Hewitson	4 Cathryn Street Waikawa Beach RD 31 Levin 5573	Yes

6. SUMMARY OF DECISIONS REQUESTED

Each decision requested as set out in this summary endeavours to identify the individual outcomes sought in the submission. This is to enable people to quickly ascertain whether any submission might be of interest to them. It is not a substitute for inspecting the submission itself where the matter may be of interest.

If, after inspecting the summary of decisions requested there are areas of interest, it is recommended that the full copies of the individual submissions are inspected.

Each submission has a unique number (i.e. 20/070), any Further Submission made must specify the number of the original submission that the Further Submission relates to. The unique submission number is also used to cross reference the address for service for all of the submitters contained in the following table.

The submissions are summarised in numerical order. Where it has been specified or is clear that the submission is either in support, or opposition, to the Plan Change this has been included in the table below.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/001	New Zealand Historic Places Trust <i>Pouhere Taonga</i>		Support	Supports the intent of the plan change and seeks amendments that reflect amendments to the RMA after the District Plan became operative.	
		Section 2.1		Adverse effects of rural subdivision and development on sites of historic heritage and cultural significance is considered a significant issue to the sustainable management of the Horowhenua Rural environment.	That new text be added to Section 2.1 Overview of Rural Environment.
		Section 2.2		Adverse effects of rural subdivision and development on sites of historic heritage and cultural significance is considered a significant issue to the sustainable management of the Horowhenua Rural environment.	That a new issue be added to replace Issue 5.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/001 Continued	New Zealand Historic Places Trust <i>Pouhere Taonga</i>	Section 2.3		No definition in District Plan or Plan Change 20 for historical or cultural values, should therefore refer to historic heritage as the RMA contains a comprehensive definition.	That Policy 1.8 be amended to read "Avoid, remedy or mitigate adverse effects of subdivision, use and development of land on areas or features of landscape, biodiversity, historic heritage or cultural values".
		Section 2.3		Given the natural features of the coastal environment in particular the dune landscape which is likely to contain archaeological material, such as burials midden and oven separate policy should acknowledge this for the Coastal Environment and Foxton Dunefields landscape domains. The Moutoa-Opiki Plains domain by virtue of containing the Manawatu River which is of high archaeological and cultural significance should also have a separate policy	That additional policies be added to Section 2.3 Coastal Environment Domain "Protect the historic heritage values of the Coastal Environment by avoiding, remedying or mitigating the adverse effects of inappropriate subdivision and land development." Foxton Dunefields Domain "Protect the historic heritage values of the Foxton Dunefields by avoiding, remedying or mitigating the adverse effects of inappropriate subdivision and land development." Moutoa Opiki Plains Domain "Protect the historic heritage values of the Moutoa Opiki Plains Domain by avoiding, remedying or mitigating the adverse effects of inappropriate subdivision and development."
					That Policy CL.7 be amended Coastal Lakes Domain "Protect the landscape, natural ecological, historic heritage and cultural values of the Coastal Lakes landscape, particularly Lake Horowhenua and Lake Papaitonga and their

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20/001 Continued	New Zealand Historic Places Trust <i>Pouhere Taonga</i>	Appendix 1 Chapter 2		Appendix 1 does not recognise any historic heritage, in particular archaeological or cultural values of the proposed Landscape Domain. Further work should be undertaken to recognise the historic values of the landscape domains	surrounding areas, from inappropriate subdivision and land development.” That Appendix 1 be amended to identify and recognise the historic heritage values.
		Rule 19.4.2		No definition with the District Plan or Plan Change 20 for cultural or historic sites. Reference should instead be made to historic heritage.	That Rule 19.4.2.A (v) be amended to read “Effects on significant sites and features, including natural, cultural and historic heritage sites.”
		Activity Status		Subdivision of rural zoned sites containing a historic heritage feature should be assessed as a Discretionary activity. District Plan should enable a flexible rather than limiting approach, to assess any actual/potential effects of subdivision on historic heritage as part of the consent process.	That the Plan Change be amended so that subdivision of a site containing a historic heritage resource is a Discretionary Activity.
		Section 24A		Further specific criteria required for assessing the impact of subdivision criteria on historic heritage values.	That new specific assessment criteria be adopted for assessing the impact of subdivision criteria on historic heritage values in accordance with the NZHPT SMHH Guidelines, in particular information sheet 20, or alternatively adopt these guidelines as a non-regulatory method into the District Plan.
		Rural Subdivision Design Guide		Recommend that a section on approaches to protect historic heritage features is included in section 4.0 of the Design Guide	That the Horowhenua Rural Subdivision Design Guidelines be adopted with amendments that provide further guidance on protecting historic heritage features.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/002	Tanenuiarangi o Manawatu Inc. (TMI)	Section 2.3		<p>Areas such as the Manawatu River, the coastal dunes and the flood plains of the Manawatu River are of particular importance and should be handled in a different way to other areas covered by these plan changes. Rangitaane maintain that the physical environment can not be separated form the cultural environment as explained in their whakapapa. In recognition of this link Rangitaane encourage any future residential planning and development be subject to a consultative process and done in way that reflect the significance of culturally important areas.</p>	<p>Include additional policies to Rural Environment Wide Policies Consult with mandated iwi who exercise Mana Whenua with each new subdivision in the future to ensure that the interests of the iwi and their significant sites are protected. Develop rules and policy that recognise their cultural connections to the landscape as well as ways to protect significant sites affected by planning changes.</p> <p>Collaborate with iwi to develop measures to mitigate the effects of cultural impact for each landscape domain when considering future subdivisions.</p> <p>Horowhenua District Council will implement steps to ensure that iwi are adequately consulted when determining areas of cultural significance to ensure subdivision will not adversely affect significant sites.</p>
		Appendix 1 Chapter 2		<p>In the past the Horowhenua District Plan has not considered any cultural or historical aspects associated with iwi for any landscape domains affected by this review. There is the opportunity for iwi to contribute to a cultural based section of the landscape assessment for each of the landscape domains</p>	<p>Accommodate a cultural based section within the landscape assessment that each iwi have contributed to for the landscape domains within their respective tribal areas recognised in the Treaty of Waitaingi framework.</p>

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/002 Continued	Tanenuiarangi o Manawatu Inc. (TMI)			<p>The need to reduce concerns that iwi may have with developments occurring near sites of significance or other areas of interest</p> <p>The need to reduce concerns that iwi may have with developments occurring near sites of significance or other areas of interest</p> <p>TMI feel that ongoing consultation needs to occur with each new development to outline and identify any significant impacts. Iwi will endeavour to notify Horowhenua District Council of sites prior to development.</p> <p>Use of archaeologists during the development in conjunction with an Accidental Archaeological Discovery Protocol to eradicate concerns that iwi may have with developments occurring near sites of significance or other areas of interest</p>	<p>Inclusion of a discovery protocol for archaeological sites, activities and artefacts within this region. Any artefacts, or evidence of past human activity discovered through future developments related to the District Plan changes are to be protected in line with relevant legislation and the process of managing the site are undertaken in strict adherence to current legislation.</p> <p>Council to develop and include an Accidental Archaeological Discovery Protocol with TMI that has suitable measures that are consistent with iwi, current legislation and are formulated specifically for this plan. Further consultation with the iwi authority will determine the contents of a protocol that are suitable for Rangitaane O Manawatu.</p> <p>Any development should not modify, remove or demolish any sites of significance to iwi, this means any site known or discovered during the development process.</p> <p>Provision for archaeologists (verified by the iwi authority) to be present during development on any areas sensitive to the iwi.</p>
20/003	Gervasio Lavo	Map 39	Oppose	Oppose the inclusion of submitter's property within the Hill Country Landscape domain as the land is flat and at least 150 metres from any hill or geographic feature. The property	That Map 39 be amended to include Lot 2 DP 63819 within the Levin-Ohau Landscape Domain.

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20/003 Continued	Gervasio Lavo			would be better suited to the Levin-Ohau Landscape Domain	
20/004	Steve & Maree Grant	Plan Change 20 Minimum Lot Size	Support	Support the changes of Plan Change 20, in particular the increased minimum lot size of 5000m2 or greater and restrictions based on the type of subdivision, which landscape domain the site is located within, and the size of the parent title. Support the restricted subdivision opportunities for sensitive landscape areas such as Coastal Environment, Coastal Lakes and Hill Country on non-highly versatile soil.	Inferred – That Plan Change 20 be adopted.
20/005	Bernard Cammack & Ann Evans	Plan Change 20	Support	Support Plan Change 20 and in particular the minimum lot size of 5000m2	Inferred - That Plan Change 20 be adopted.
20/006	Vector Gas Limited	Plan Change 20	Support	The effects of intensive subdivision and subsequent use, and development of rural land on the safety and efficiency of infrastructure services have been provided as an issue within the plan change. However this issue has not been developed into a policy or rule to appropriately deal with this issue.	That Proposed Plan Change 20 be adopted subject to some specific amendments.
		Section 2.3		An additional policy that addresses the protection of existing significant infrastructure will promote the safe and efficient operation of significant infrastructure within the Rural Environment.	That an additional policy be added to the Rural Environment Wide Policies Section 2.3 to read “Avoid, remedy or mitigate adverse effects on the operational, maintenance and protection of existing significant infrastructure from the subdivision and development of land.”

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/006 Continued	Vector Gas Limited	Section 24A.1.1		Additional assessment criteria for subdivision applications will ensure that potential adverse effects on significant infrastructure are considered when assessing subdivision applications	That an additional assessment criterion be added to Section 24A.1.1. "The extent a proposed subdivision and subsequent land use will affect the efficient and effective operation of significant infrastructure, and whether adequate measures will be provide to protect significant infrastructure if necessary."
20/007	Matthew Hoggard	Activity Status	Oppose	Oppose the introduction of non-complying activities. The matter of non-complying activities should not be considered until the outcome of the Resource Management Act review is known.	That non-complying activities are replaced by Discretionary Activities.
		Highly Versatile Soils	Support	Support the protection of versatile soil	That the protection of versatile soils be retained.
		Section 2.1.1		The term Coastal Sand Country is not reflected in the planning maps. Changes do not recognise the existing settlement patterns occurring in the rural zone.	That the Coastal Sand Country be defined. Recognise the existing lifestyle areas which occur outside of existing zoned residential areas.
		Section 2.3		Rural Environment Wide Policies should reflect the existing lifestyle development which has occurred in the rural zone	That a policy be included to recognise the importance of varied allotment sizes within the rural zone to allow individuals a range of rural living environments.
		Policy CE.5		Does not recognise the existing settlement patterns which have occurred.	That Policy CE.5 should recognise existing settlement patterns which have occurred within the coastal areas and which are outside of residential areas.
		Policy CE.9		Does not recognise the existing settlement patterns which have occurred and building	That Policy CE.9 be amended to ensure that it only relates to new subdivision as opposed

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/007 Continued	Matthew Hoggard			sites which have been approved. Rights which have been given to existing building location should be protected.	to all subdivisions.
		Climate Change		Greater emphasis needs to be placed on the importance of climate change and this should be reflected within the plan change.	That policies in all domains be included to recognise the effects of climate change.
		Appendix 1 Chapter 2 1. Coastal Env't. Landuse	Support	Support the recognition that increasing residential development is occurring in the coastal settlement areas. Also important to recognise that lifestyle development have been created outside the residential zones.	Recognise the existing lifestyle areas which occur outside of existing zoned settlements.
		Appendix 1 Chapter 2 1. Coastal Env't. Sensitivity	Oppose	Opposed to the current wording. Restriction is sought to avoid development of the coastal dune areas. If restrictions are to be imposed regarding the development of dune areas they should be proposed based on specific view points and recognise the rights that have been provided for planned and unplanned settlements at the time they were subdivided.	Define appropriate view points for restricting new subdivision development of dunes for example, development visible from State Highway 1 or Mean High Water Spring may require greater control but should not have a blanket restriction imposed. The Greenbelt Residential Subdivision Design Guide provides a good example of restrictions which could be considered for the unplanned settlements within the coastal environments.
		Table 19.4.2.C	Oppose	Opposed to the minimum lot size of 5000m ² . It appears to be an unsubstantiated figure. Effluent disposal is capable of occurring on sites below 5000m ² . 5000m ² does not encourage sustainable development or reflect the needs of the community.	That Table 19.4.2.C be amended so that the Minimum lot size for Coastal Environment should be 2000m ² .
		Rule 19.7(a)		Coastal Buffer Area not defined on all planning maps	That the Coastal Buffer Area be clearly defined on all Planning maps.

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20/007 Continued	Matthew Hoggard	Table 19.8.1	Oppose	Opposed to table, it is convoluted and does not provide certainty to the public. The table should be simplified. Creation of a minimum parent title size and minimum balance allotments results in an ability to develop existing smaller allotments.	That Table 19.8.1 be removed or ensure that the table prevents fragmentation of larger rural blocks and encourages subdivision of existing and presently fragmented rural blocks.
20/008	Bruce Jenkins	Minimum Lot Size	Oppose	Oppose the minimum lot size increase from 2000m ² to 5000m ² . The increased size would be a maintenance problem for most prospective buyers. Untidiness and potential fire risk could result if the sections are not maintained. The current 2000m ² minimum size is much more manageable and provides options to make the sections fit the terrain avoiding environmental impacts such as earthworks. Plan Change 20 locks up a situation that is not in the best interest of prospective buyers of any new subdivision at Waikawa Beach.	That the Council does not proceed with the part of Plan Change 20 that increases the minimum lot size from 2000m ² to 5000m ² .
20/009	G & E Williams Consultants Ltd	Plan Change 20	Support	Support the additional objectives and policies of the plan change and think that the proposed rules are a reasonable way of implementing these policies.	Inferred – That Plan Change 20 be adopted.
		Design Guide & Assessment Criteria	Support	Strongly support the use of design guidelines and Assessment Criteria. The guidelines are useful in explaining the intent of the plan changes	Inferred – That Plan Change 20 be adopted.
		Landscape Domains	Support	Support the division of the district into Landscape domains. While any division must have a degree of arbitrariness at the boundaries it is useful to distinguish different areas of the district in terms of their	Inferred – That Plan Change 20 be adopted.

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20/009 Continued	G & E Williams Consultants Ltd			landscape character, productive potential and hazard vulnerability, and hence the type and density of subdivision that is appropriate.	
		Activity Status	Support	Support the full range of activity classes from controlled through to non-complying. Do not agree with all the rules as proposed nor always with the criteria that changes activity status of an application. Would prefer to see Council use more discretion especially as the design guidelines allow a considerable degree of subdivision and development flexibility.	Inferred – That Plan Change 20 be adopted. Inferred – That the Council should have greater use of discretion in determining subdivision applications.
20/010	Richard Walker	Minimum Lot Size	Oppose	Oppose the increase in minimum lot size from 2000m2 to 5000m2. The area north of Waikawa can support sections smaller than this. Waikawa Beach is becoming a holiday area and the larger sections would be more difficult to maintain and will become untidy and a fire risk.	That the minimum lot size not be changed from 2000m2 to 5000m2
20/011	Irene Walker	Minimum Lot Size	Oppose	Oppose the increase in minimum lot size. The area at the north end of Drake Street and Arthur Street at Waikawa Beach would have the minimum lot size increased from 2000m2 to 5000m2. People who come to this unique coastal area enjoy a relaxing and enjoyable lifestyle without having to maintain a one acre block. This area will be a continuation of the existing settlement of quarter acre sections. It would be logical to continue the low density residential zoning of 1000m2 - 2000m2 encouraging greater	None Specified. Inferred: That the minimum lot size not be changed from 2000m2 to 5000m2. Allow a low density residential zoning at the north end of Arthur and Drake Streets, Waikawa.

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20/012	Alan Prentice	Minimum Lot Size	Oppose	development and more residents Oppose the increase in minimum lot size from 2000m2 to 5000m2. Waikawa Beach is basically a beach resort with most of the sections requiring minimum maintenance. The two areas under consideration would be conducive to 2000m2 sections in that there would be far less earthworks required than for 5000m2 sections. Smaller 2000m2 section so will encourage greater development and hence more residents resulting in a greater concentration of people per hectare.	None Specified. Inferred: That the minimum lot size is not changed from 2000m2 to 5000m2.
20/013	William Masters	Plan Change 20	Oppose	Oppose the fact that ratepayers affected will not have control over what they do with their land. The plan change would prevent subdivision of submitters land	Don't allow these plan changes to go ahead specifically with regard to being able to subdivide rural land.
20/014	Walter Dalgliesh	Plan Change 20	Support	Agrees with Plan Change 20 and supports the long term protection of the region's significant environmental conservation features	Inferred: That Plan Change 20 be adopted.
		Conservation Lots	Opposed	Opposed to any subdivision or any action that would hasten the erosion of these future eco tourism natural wonders.	Require that any potential subdivisions or proposed changes on a boundary of a conservation lot must be processed and authorised by the Dept. of Conservation prior to public notification.
20/015	Horowhenua District Council	Rule 19.4.2.A	Support	Support Plan Change 20 and seek an amendment to provide clarification and reduce confusion where a property is within two different landscape domains.	That an explanatory paragraph be added as a 7 th paragraph to the Note to plan users in Section 19.4.2.A "The more restrict activity status will also be applied in the situation where a property to be subdivided is located within two or more landscape domains, and would be subject to

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20/016	Fish & Game Wellington Region	Significant Natural Areas Conservation Lots	Oppose	Opposes the plan change on the basis that two specific clarifications need to be made The removal of the connection between rural subdivision and Outstanding Landscapes and use of landscape domains does not provide increased certainty of protection of significant natural areas Sites such as wetlands often require active management due to accelerated processes in modified environment. Management plans in addition to formal legal protection of conservation lots should be a requirement when creating a conservation lot through subdivision. Management Plans should be prepared by professional ecologists and be able to be independently peer reviewed prior to subdivision applications being approved.	a different activity status for each domain." That the identification of a Significant Natural Area classification list be included in addition to the landscape domain classification. That in addition to formal legal protection, management plans with measurable objectives for action should be a requirement through the creation of a conservation lot.
20/017	Matthew Walker	Minimum Lot Size	Oppose	Opposes the increase in the minimum lot size from 2000m ² to 5000m ² . The area north of Waikawa should be smaller in size so it continues with the existing sections on Drake and Arthur Streets. Larger sections will mean more maintenance for holiday makers and more risk of them becoming untidy sections.	That the minimum lot size remains at 2000m ² .
20/018	Lesley-Anne Walker	Minimum Lot Size	Oppose	Oppose the increase in minimum lot size from 2000m ² to 5000m ² . The area north of Waikawa can support sections smaller than this. Waikawa Beach consist largely of holiday homes and the larger sections would be more difficult to maintain and will become	None Specified. Inferred That the minimum lot size not be changed from 2000m ² to 5000m ² .

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/018 Continued	Lesley-Anne Walker			untidy and a fire risk. 2000m2 sections along side the existing settlement is much more sensible. 5000m2 should not be an option unless adjacent to larger lifestyle blocks.	
20/019	Cameron Walker	Minimum Lot Size	Oppose	Oppose the increase minimum lot size from 2000m2 to 5000m2. 5000m2 is too much land for weekenders to maintain. These sections would become untidy very quickly. Smaller 2000m2 section gives developers greater scope to have less impact on the environment.	That the minimum lot size remains at 2000m2.
20/020	Mandy Cumming	Minimum Lot Size	Oppose	Oppose the increased minimum lot size from 2000m2 to 5000m2. Waikawa Beach is a holiday settlement, sections of 2000m2 would be hard enough to maintain let alone sections of 5000m2.	Retain the minimum lot size as 2000m2.
20/021	Higgins Group Holdings Limited	Plan Change 20	Support	The purpose of Proposed Plan Change 20 in conjunction with Proposed Plan Change 21, appears to better manage the location and nature of subdivision within the Horowhenua District and to direct certain types of growth into certain areas.	Inferred: That Plan Change 20 be adopted.
		Section 2.1	Support	Supports the description of the Rural Environment in section 2.1. This section should however also include reference to gravel extraction and quarrying/aggregate processing activities to ensure that existing future activities of this nature are recognised and provided for.	That an additional sentence to Section 2.1 as third sentence to paragraph 1. "Infrastructural and other industrial-type activities also occur in the rural environment, such as network utility works and gravel extraction, and these are critical to the functioning of the District".
		Issue 5B	Support	Supports the approach set out in these objectives and policies provided it is made	That the discussion on Issue 5B be amended to read as follows;

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/021 Continued	Higgins Group Holdings Limited			clear in the Plan that large-scale processing and infrastructure activities actually includes gravel extraction, quarrying and aggregates processing.	"In most cases, the rural environment is the only place where large-scale processing and infrastructure facilities such as landfills, treatment plans, and aggregate extraction and processing activities can be sited to have sufficient resources and /or land to operate and be sufficiently far enough away from residential dwellings to avoid adversely affecting occupants".
20/022	Waikawa Beach Ratepayers Association	Map 39	Support	<p>Supports that the Coastal Environment is unique and fragile and must be guarded from undue development that would spoil this character.</p> <p>The extent of the Coastal Environment should be extended to include land up to Waikawa Heights as the dune system extends to at least this area.</p> <p>The Coastal Lakes landscape domain should be renamed. Whilst it is acknowledged that there are lakes of significant importance in this region, much of it significant wetlands as well. The name implies that man made lakes are acceptable.</p>	<p>That the Coastal Environment Landscape domain be increased in area to include the land up to Waikawa Heights.</p> <p>That the Coastal Lakes Landscape Domain be renamed.</p>
20/023	Pauline Masters	Plan Change 20	Oppose	Oppose the Plan changes on the grounds that the HDC staff and Councillors are in default of their fiduciary duty to the ratepayers. There is no mention of any positives or benefits to the individual or collective ratepayers.	That the status quo should remain and the proposed plan change should go no further.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/024	Department of Conservation	Plan Change 20	Oppose	<p>Oppose the lack of measures included to identify and protect significant natural resources from the adverse effects of rural subdivision.</p> <p>The District Plan refers to Significant Natural Areas and Significant sites and features but these are not defined in the plan and therefore fail to provide adequate protection for such areas.</p> <p>There is insufficient clarity as to the matters which Council will retain its control over as a Controlled Activity subdivision in the rural zone, particularly where there relate to effects on natural resources. The plan change in its current form does not adequately meet the purpose and principles of the RMA particularly the matters in part regarding protection of natural and physical resources and sustainable management of those resources.</p>	<p>That Plan Change 20 be adopted and that a policy and method be included which requires the Council to define and identify all significant natural resources in the District and to introduce a plan change by 2012 which provides rules, policies and objectives to avoid, remedy and mitigate adverse effects on those resources.</p> <p>That until the plan change is in place the Council should introduce an interim rule so that all subdivision in the rural zone is a limited discretionary activity.</p>
20/025	Barry Brown	Waikawa Beach - rezoning	Oppose	<p>Opposed to the rezoning of rural land around Waikawa Beach as it will irrevocably change the character and nature of this area. Any further residential accommodation in these areas will be likely to have an adverse effect on the delicate coastal environment and breeding habitats. Further residential accommodation will result in increased vehicular traffic on the beach. The rural zoning provides the consent process to scrutinise non-rural activities.</p>	<p>That existing rural zone classification be retained.</p>

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/026	Francee Thompson	Minimum lot size	Oppose	Oppose the minimum lot size for Greenbelt residential properties at Waikawa Beach. Waikawa Beach is mainly holiday homes and the larger sections would be more difficult to maintain and will become untidy and a fire risk.	That the minimum lot size in the Greenbelt Residential zone remain as 2000m2.
20/027	Solari Products	Plan Change 20	Support	Support for the general intent of the plan change.	Inferred: That Plan Change 20 be adopted.
			Opposed	<p>Opposed to the provisions as currently proposed as they do not adequately cover the following concerns.</p> <p>Concerned that unrestricted subdivisions in rural areas will result in reverse sensitivity complains on legitimate rural farming activities.</p> <p>Concerned that lifestyle blocks in rural areas will restrict the adoption of future technology or new management practices on neighbouring properties.</p> <p>Highly and non-highly versatile soils are based on historic maps that do not take into account improving soils outside those areas.</p> <p>Major emphasis on the landscape attributes of the area but more focus should be placed on soils and rural working activities.</p>	That any subdivision in the rural zone should be a discretionary activity.
20/028	Syd D'Ath	Levin-Koputaroa provisions	Support	Support the provision that relate to the Levin-Koputaroa Landscape Domain. These provisions are more comprehensive and therefore are likely to be more effective in managing the adverse effects of	That the Levin-Koputaroa provisions of Plan Change 20 in their current form be adopted.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/028 Continued	Syd D'Ath			subdivision on the high value soils and open landscape of this domain.	
20/029	Barbara Wilson	Levin-Koputaroa provisions	Support	Support the provision that relate to the Levin-Koputaroa Landscape Domain. These provisions are more comprehensive and therefore are likely to be more effective in managing the adverse effects of subdivision on the high value soils and open landscape of this domain.	That the Levin-Koputaroa provisions of Plan Change 20 be adopted in their current form.
20/030	Elizabeth McCabe	Objective 1A Policies 1A.1-1A.5	Support	Support the provision as they clearly state the Council's wish to protect highly versatile soils.	Inferred: That Objective 1A and Policies 1A.1-1A.5 be adopted.
		Rural Subdivision Design Guide	Support	Support the further emphasis in the Design Guide to preserve the highly productive soils.	Inferred: That the Highly Versatile Land provisions within the Design Guide be adopted.
		Map 39 The following provisions in relation to the Manakau Downlands Domain 2.3 Appendix 1 of Chapter 2 Rule 19.4.2 Rule 19.5 Rule 19.6 Section 24A.1.4	Opposed	Oppose the inclusion of the area of highly versatile soils in the Manakau Downlands domain on the basis that insufficient weight has been given to the protection of these soils in this domain. The soils should be awarded equal status to those in the adjoining Kuku domain.	That the Class 1 and 2 land in the Manakau Downlands domain be included in the adjacent Kuku domain to give greater protection to the Class 1 and 2 soils. Alternatively the plan change be amended to apply the provisions of the Kuku domain to the Class 1 and 2 lands currently in the Manakau Domain.
			Opposed	Fragmentation of land to the north of the Manakau village is likely to be reliant on access from the existing village road network resulting in pressure to upgrade the	That specific recognition be given in the provisions for the Manakau Downlands domain for subdivisions that require access from the existing one way village road

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/030 Continued	Elizabeth McCabe			road network and adversely affecting the unique character of the village.	network and could affect the unique character of the village. Any other relief that would remedy the concerns outlined above.
20/031	Jeremy Miles	Objective 1A Policies 1A.1-1A.5	Support	Support the provision as they clearly state the Council's wish to protect highly versatile soils.	Inferred: That Objective 1A and Policies 1A.1-1A.5 be adopted.
		Rural Subdivision Design Guide	Support	Support the further emphasis in the Design Guide to preserve the highly productive soils.	Inferred: That the Highly Versatile Land provisions within the Design Guide be adopted.
		Map 39 The following provisions in relation to the Manakau Downlands Domain 2.3 Appendix 1 of Chapter 2 Rule 19.4.2 Rule 19.5 Rule 19.6 Section 24A.1.4	Opposed	Oppose the inclusion of the area of highly versatile soils in the Manakau Downlands domain on the basis that insufficient weight has been given to the protection of these soils in this domain. The soils should be awarded equal status to those in the adjoining Kuku domain.	That the Class 1 and 2 land in the Manakau Downlands domain be included in the adjacent Kuku domain to give greater protection to the Class 1 and 2 soils. Alternatively the plan change be amended to apply the provisions of the Kuku domain to the Class 1 and 2 lands currently in the Manakau Domain.
			Opposed	Fragmentation of land to the north of the Manakau village is likely to be reliant on access from the existing village road network resulting in pressure to upgrade the road network and adversely affecting the unique character of the village.	That specific recognition be given in the provisions for the Manakau Downlands domain for subdivisions that require access from the existing one way village road and network could affect the unique character of the village. Any other relief that would remedy the concerns outlined above.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/032	Transpower New Zealand Limited	Plan Change 20		Amend the objectives, policies, rules and assessment criteria to appropriately recognise and provide for an adequate level of protection for the National Grid from third party subdivision activities and development.	Inferred: That Plan Change 20 with detailed amendments be adopted.
		Rural Subdivision Design Guide		Incorporate appropriate provisions for development near high voltage transmission lines on the Rural Subdivision Design Guide.	That heading on page 20 be amended to read "Infrastructure" and make "Water, Drainage and Stormwater" the first sub heading. Add new sub heading "High Voltage Transmission Lines", diagrams and text (See Submission for detail and diagrams).
		Section 2.3 Issue 5			That a new objective be included "To ensure that subdivision and land development does not compromise the ongoing operation, maintenance, upgrading and development of the National Grid".
		Section 2.3 Issue 5			That a new policy be included "To avoid, remedy or mitigate any actual or potential adverse effects of subdivision and land use development/activities on the National Grid".
		Rule 19.5.1			That rule 19.5.1 be amended to include an additional provision "Any subdivision within 32 metres of the centre line of transmission lines provided the standards for Controlled Activities in Rules 19.4.2B and 19.4.2C are met. The exercise of Council's discretion shall be limited to: <ul style="list-style-type: none"> Measures necessary to protect existing

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/032 Continued	Transpower New Zealand Limited	Rule 19.4.2B(vi)(h) Section 24A Assessment Criteria	Support		high voltage transmission lines and people's health and safety. Notification: For the purposes of notification/non-notification, Transpower New Zealand Limited will be identified as a potentially affected party in respect of Rule 19.5.1(e). Retain Rule 19.4.2B(vi)(h). That a new assessment criterion be included for the assessment of Limited Discretionary Activities with respect to subdivision within 32 metres of the centrelines of a transmission line. (See Submission).
20/033	Lakeview Farm Ltd	Plan Change 20	Support	Support the general thrust of protecting the farming lands. Need to protect the most productive horticultural and market gardening land. No subdivision of productive lands and only limited subdivision of general farming land. Subdivision of farming blocks should not be less than 1 hectare in size. For any subdivision of farmland the future owners need to not complain about normal farming practices.	Inferred: That Plan Change 20 be adopted.
20/034	Palliser Farm Estates Ltd		Oppose	Oppose the increase in minimum lot size based on landscape domain. Oppose the restrictions on the type of subdivision including the number of lots to be created. Oppose the restricted subdivision opportunities for subdivision of sensitive landscape areas. There is sufficient provision in the existing plan to control rural subdivision.	That status quo should remain for the control of rural subdivisions. Do not adopt Plan Change 20.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/035	Horowhenua District Council		Support	Supports Plan change 20 with amendments. Provide policies that make allowances for density bonuses for clustering of lots/houses if on communal wastewater systems. Would encourage more open space and land available for primary production. Apart from clustered lots sharing communal wastewater systems the minimum lot size should be 5000m2.	Inferred: That Plan Change 20 be adopted with amendments to better protect the rural amenity.
		Planning Maps			That the Planning Maps be amended to include areas subject to coastal and waterway hazards as well as referencing Highly erodible land.
		Policy FD.2 and Appendix 1 of Chapter 2		Amend policy FD.1 and Appendix 1 to refer to correct dune type.	That Policy FD.2 and Appendix 1 be amended to refer to longitudinal dunes and not parabolic dune fields.
		Policy 1.16		Local and collector roads have also negatively affected the efficiency and safety of a number of rural roads. Entranceways that serve multiple dwellings should be encouraged.	That Policy 1.16 be amended to refer to collector and local roads.
		Rule 19.4.2		A limit should be placed on the amount of earthworks associated with a subdivision that can be undertaken as a Controlled Activity.	That a limit on the amount of earthworks that can be undertaken in association with a subdivision as a Controlled Activity be included.
20/039	Louise Miles	Objective 1A Policies 1A.1-1A.5	Support	Support the provision as they clearly state the Council's wish to protect highly versatile soils.	Inferred: That Objective 1A and Polices 1A.1-1A.5 be adopted.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/039 Continued	Louise Miles	Rural Subdivision Design Guide	Support	Support the further emphasis in the Design Guide to preserve the highly productive soils.	Inferred: That the Highly Versatile Land provisions within the Design Guide be adopted.
		Map 39 The following provisions in relation to the Manakau Downlands Domain 2.3 Appendix 1 of Chapter 2 Rule 19.4.2 Rule 19.5 Rule 19.6 Section 24A.1.4	Opposed	Oppose the inclusion of the area of highly versatile soils in the Manakau Downlands domain on the basis that insufficient weight has been given to the protection of these soils in this domain. The soils should be awarded equal status to those in the adjoining Kuku domain.	That the Class 1 and 2 land in the Manakau Downlands domain be included in the adjacent Kuku domain to give greater protection to the Class 1 and 2 soils. Alternatively the plan change be amended to apply the provisions of the Kuku domain to the Class 1 and 2 lands currently in the Manakau Domain.
			Opposed	Fragmentation of land to the north of the Manakau village is likely to be reliant on access from the existing village road network resulting in pressure to upgrade the road network and adversely affecting the unique character of the village.	That specific recognition be given in the provisions for the Manakau Downlands domain for subdivisions that require access from the existing one way village road network and could affect the unique character of the village. Any other relief that would remedy the concerns outlined above.
20/037	Horowhenua District Council Growers Association			Support Submission lodged by Horticulture New Zealand in its entirety.	Inferred: That the Council support the matters raised in the submission lodged by Horticulture New Zealand.
20/038	New Zealand Railways Corporation (NZRC)	Issue 5(c) Policy 1.16 Rule 19.4.2.A(ii) Rule 19.5.1(c)(i) Rule 19.5.1(c) (ii) Rule 19.9.1(b)	Support	Supports the intention of Plan Change 20 Specifically the recognition of the potential effects of inappropriate subdivision on the development of the railway network.	Inferred: That Plan Change 20 be adopted specifically Issue 5(c) Policy 1.16 Rule 19.4.2.A(ii) Rule 19.5.1(c)(i) Rule 19.5.1(c) (ii)

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
		Section 24A.1.3.3(a) & (b)			Rule 19.9.1(b) 24A.1.3.3(a) & (b)
20/038 Continued	New Zealand Railways Corporation (NZRC)	Issue 5B(ii) Rule 19.4.2.A(x)	Support	Supports the inclusion of provisions relating to reverse sensitivity. NZRC comprises both ONTRACK and KiwiRail. More accurate to refer to NZRC Consistency of terminology used by HDC to align with terminology used by NZRC	Inferred: That Issue 5B(ii) and Rule 19.4.2.A(x) be adopted. That all references in Plan Change 20 to ONTRACK be changed to NZRC. That all references in Plan Change 20 to North Island Main Trunkline be changed to North Island Main Trunk Railway Line.
		Issue 5		Change is requested to highlight the potential adverse effects of inappropriate subdivision on the railway network.	That the words 'the 'railway network'' be added to 5 th paragraph of section 2.3 discussion of Issue 5.
		Rule 19.4.2.A(x)		Change is requested to reflect that vibration is a potential reverse sensitivity effect associated with infrastructure such as the railway network	That Rule 19.4.2.A(x) be amended to include vibration.
		Rule 19.5.1(c)(i) Rule 19.5.1(c) (ii) Rule 19.9.1(b) Section 24A.1.3.3(a) & (b)		NZRC can only decline applications for level crossings on safety grounds. Level crossings do not constitute sufficient legal and physical access in terms of s.106 of the RMA.	Strengthen the provisions to recognise that accesses over level crossings do not constitute legal access. Follow Selwyn District Plan example: see submission.
20/039	Barry Smith	Minimum lot size	Oppose	Oppose the increased minimum lot size up to 5000m2. Larger sections are hard to maintain and will present a fire risk and become an eyesore.	That the minimum lot size remains at 2000m2.
20/040	Tarrant Trust	Minimum Lot size	Oppose	The proposed minimum lot size is contrary to user demands and would restrict a social mix of settlement.	Inferred: That the minimum lot size remains unchanged.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/041	John Martin		Support	Supports the Council addressing the question of rural subdivision at this time. Consideration should be given to moving all development away from highly productive land including restricting housing to Class 4 or higher land. Consideration of creating hamlets and utilising stand-alone water and sewage schemes	None Specified.
20/042	Truebridge Associates		Oppose	Oppose Plan Change 20 as it introduces many different options to control subdivisions in rural areas. Council should simplify these controls. Restrictions based on parent title issue date has no relevance to effects on the environment and should not be used as a subdivision control.	That changes be made in accordance with the submission.
		Policy CE.3 Policy CE.9 Policy FD.5 Policy TT.5 Policy MD.4 Policy 1A.2	Oppose	Assessment Criteria and tone of the wording allows for consideration of non-compliances however many objectives and policies contain wording where activities are to be avoided. These policies are too prohibitive and overly restrictive.	That the prohibitive aspects of wording are removed from policies Policy CE.3 Policy CE.9 Policy FD.5 Policy TT.5 Policy MD.4 Policy 1A.2
			Oppose	Minimum lot size would be increased from 2000m ² to 5000m ² in line with Horizons Proposed Regional Council One Plan. What happens if Horizons change from 5000m ² ?	None Specified.
		Appendix 1 of Chapter 2 (Coastal Environment)	Oppose	Wording in Appendix 1 of Chapter 2 describing the opportunities & constraints or sensitivity is too prohibitive and does not allow sufficient scope for an applicant to	That the prohibitive aspects of the wording in Appendix 1 of Chapter 2 be removed.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/042 Continued	Truebridge Associates	Opportunities & Constraints) (Foxton Dunefields Opportunities & Constraints) (Kuku Opportunities & Constraints) (Hill Country – Sensitivity Opportunities & Constraints)		make an application and argue the merits or potential adverse effects of the proposal or development.	
		Rural Subdivision Design Guide	Oppose	Wording in the Design Guide is too restrictive and does not allow or an applicant to make an application and have a reasoned debate about the potential effects of the proposal. Terms and wording used in the Design Guide is ambiguous and creates uncertainty. If plan change is to have desired impact, then more consideration is required of the impacts of all development in the rural area not just large scale subdivision. No controls present on individual dwellings. Overall concern that the Plan Change in its current form will have a negative impact on future development within the Horowhenua.	That the wording considered to be too restrictive be removed and that clarification be provided over ambiguous terms or wording. None Specified.
20/043	Marilyn Blenkhorn		Support	Fully support the introduction of Plan Change. Must halt further fragmentation as it will not work until a short term halt is in place, followed by disabling options set out. Horowhenua needs a strong design plan	Inferred: That Plan Change 20 be adopted.

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20/043 Continued	Marilyn Blenkhorn			and to be different to other areas. Must provide a distinct edge between urban and rural.	
		Appendix 1 of Chapter 2	Oppose	Oppose the use of pine forest as providing Visual Absorption Capability in the Levin-Koputaroa Landscape Domain	Remove Pine Forestry as a provider of Visual Absorption Capability in Levin-Koputaroa landscape Domain.
20/044	New Zealand Fire Service Commission	Policy 1.13	Support	Supports this policy and recommended that it be amended to include reference to the Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008.	That Policy 1.13 be amended to read "Ensure that rural residences can access on-site adequate quantities of potable water and fire fighting water supply (complying with NZS 4509:2008 or any subsequent amendments) to avoid risks to human health and amenity."
		Rule 19.4.2.A(iii)	Support	Supports this rule and recommended that it be amended to include reference to the Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008.	That Rule 19.4.2.A(iii) be amended to read "The provision and design of servicing and network utilities, including potable water supply, fire fighting water supply (complying with NZS 4509:2008 or any subsequent amendments), wastewater systems, stormwater management and disposal, streetlighting, telecommunications and electricity."
		Rule 19.5.1(a)(i)	Support	Supports this rule and recommended that it be amended to include reference to the Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008.	That Rule 19.5.1(a)(i) be amended by adding an additional bullet to read "Fire fighting water supply (complying with NZS 4509:2008 or any subsequent amendments)."
		New Zealand Fire Service Commission	Support	Supports this provision and recommended that it be amended to include reference to the Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008.	That Section 24A.1.1(j) be amended to read "The provision, design and location of network utility services, water supply, fire fighting water supply (complying with NZS

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/044 Continue	New Zealand Fire Service Commission				4509:2008 or any subsequent amendments), waste water systems, access ways and vehicle, new and existing roads to services the needs of the subdivision, without adversely affecting the environment.”
20/045	Mr & Mrs Astwood	Issue 5, Objective 1A, Rural Wide policies 1.1, 1.2, 1.3, 1.8, 1.10 & 1.16, Policies LO.1-LO.5, Appendix 1 of Chapter 2	Oppose	Oppose parts of Plan Change 20 in relation to the Levin-Ohau Domain and in particular the lack of certainty in the Plan Change around the provision of the link road identified in the Development Plan between the Papaitonga Springs and Western Rise subdivision. The proposed objectives and policies fail to address the means by which the need for travel on strategic roads generated by new subdivisions is reduced, or provide sufficient guidance in respect of avoiding, remedying, mitigating the environmental effects of roading infrastructure associated with subdivision and related development in the Levin-Ohau domain.	That Council clarify its intentions in respect of the proposed future link road between Papaitonga Springs and Western Rise subdivisions prior to adopting Proposed Plan change 20. That the Council amend Issue 5, Objective 1A, Rural Wide policies 1.1, 1.2, 1.3, 1.8, 1.10 & 1.16, Policies LO.1-LO.5, & Appendix 1 of Chapter 2 to reflect the council's intentions in respect of the future road link between Papaitonga Springs and Western Rise subdivisions
20/046	Judy Keall		Support	Strongly support Council's rejection of the one size fits all approach and applaud the new approach based on recognising the many different landscapes within the Horowhenua rural environment.	Inferred: That Plan Change 20 be adopted.
			Opposed	Opposed to residential development beyond the perimeter of the village settlement of Manakau, particularly north of the village. Oppose good farmland being used for housing. More emphasis should be put on protecting the high quality soil in this northern part of the domain. No mention of	That subdivisions that require access from the existing Manakau village road network be restricted to ensure that current roading does not need to be widened. That greater protection is given to the Class 1 and 2 soils that fall within the Manakau

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/046 Continued	Judy Keall			soil protection or protection of the unique character of Manakau village. Oppose the inclusion of a significant area of highly versatile soils being included in the Manakau Downlands Domain.	Downland domain.
		Objective 1A	Support	Support this objective but want reassurance that it will translate into the management of the Manakau Downlands	That greater protection is given to the Class 1 and 2 soils that fall within the Manakau Downland domain.
		Policy 1A.2	Support	Strongly support Policy 1A.2.	Inferred: That Policy 1A.2 be adopted.
		Policy 1B.3	Support	Strongly support Policy 1B.3.	Inferred: That Policy 1A.2 be adopted.
			Opposed	Opposed to any subdivision consent being granted without notification of neighbours who may be affected.	That applications for Limited Discretionary Activities should not be able to avoid the standard requirements for written notification.
20/047	Horticulture New Zealand			It is more appropriate to call the areas into which the Plan Change proposes to divide the district into – Rural Production Environments as each areas the production environment reflects the physical characteristics of the area.	That the Landscape Domains be renamed as Rural Production Environments and make consequential changes throughout the Plan
		Rural Character		One of the key mechanisms sought is that the Plan has a robust definition of rural character that describes the rural production environment and the types of activities that can reasonably be anticipated in that environment.	That an additional policy be included as a Rural Environment Wide Policy “To ensure that new activities locating in the rural area to be of a nature, scale, intensity and location consistent with maintaining the character of the rural area and to be undertaken in a manner which avoids remedies or mitigates adverse effects on rural character, including rural production values.” That a definition of rural character be

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20/047 Continued	Horticulture New Zealand			<p>Horticulture NZ supports the RMA requirement for safeguarding the life supporting capacity of soils. Horticulture NZ considers that soils are only one of many matters that need to be provided to enable commercial vegetable and fruit production to occur economically. A sole focus on soil means that all landowners with so-called versatile soils are forced into a type of production system that may be neither possible, reasonable or economic.</p>	<p>included for Rural Character that includes the following key elements</p> <ul style="list-style-type: none"> • A predominance of natural features over human made features • High ratio of open space relative to the built environment • Significant areas of vegetation in pasture, crops, forestry and/or indigenous vegetation • A rural working production environment • Presence of farmed animals and crops • Noises, smells, dust, spray drift and effects associated with the use of rural land for a wide range of agricultural, horticultural and forestry purposes • Low population densities relative to urban areas • Existence of some narrow and/or unsealed roads • General lack of urban infrastructure <p>That the Plan Change is amended to place the focus on rural production system and remove references to versatile soils or highly versatile soils.</p>

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/047 Continued	Horticulture New Zealand			Consistency required with other changes sought.	That any consequential amendments consistent with this change be made.
		Highly Versatile Soils		RMA Amendment Bill 2009 presently before Parliament seeks to delete non-complying activities.	That the text in Amendment 1 to be deleted, be retained; and amend Plan change to not include non-complying activities.
		Introduction Amendment 2		Consistency required with other changes sought.	That the text to be added for Non-complying activities be deleted and exclude Non-complying activities from the Plan Change.
		Section 2.1 Section 2.1.1 Section 2.1.2 Section 2.1.3		Consistency required with other changes sought. Greater factual focus required in descriptions of areas.	Change all references of market gardening to horticulture. Amend paragraphs 2 and 3 of Section 2.1 to reduce the landscape emphasis. Include horticulture in paragraph 4 of section 2.1.1 Coastal Sand Country Amend sentence in 2.1.2 Inland Plains and River Terraces. Amend 2 nd paragraph of 2.1.3 Hill Country to include horticulture.
		Section 2.2 Issues 5, 5A & 5B		Consistency required with other changes sought.	That Issues 5, 5A and 5B be amended to better reflect the rural production environment and so that all subdivisions consider the effects on the existing environment.
		Section 2.3	Support	Supports the explanatory text of Issue 5 as it identifies rural productive values as being important.	That the explanation of Issue 5 be retained.
		Section 2.3	Support	Supports Objective 1 as it seeks to ensure that subdivision maintains the character and amenity values of the rural environment.	That Objective 1 be retained.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/047 Continued	Horticulture New Zealand	Policy 1.1 Policy 1.5 Policy 1.6 Policy 1.7 Policy 1.10		<p>Consistency required with other changes sought.</p> <p>Horticulture NZ supports the use of Conservation lots and the protection of natural features however it opposes the easing of conditions on the right to subdivide in exchange for a conservation benefit that could be seen to override other factors for consideration.</p> <p>Policies should reflect the rural production activities in the area.</p>	<p>That landscape domains are replaced with rural production environments through the policies.</p> <p>Include in Policy 1.1 recognition of rural productive values.</p> <p>That an additional policy that recognises the effects subdivision has on rural character including rural productive values be included.</p> <p>That Policy 1.6 be amended by adding that farm buildings need to be located in areas suitable for their function.</p> <p>That Policies 1.5 and 1.7 be retained.</p> <p>That Policy 1.10 be amended to begin "Provide for the protection..."</p> <p>That the title of Landscape Domains be amended to Rural Productive Environment.</p> <p>Add an additional policy to each area that reflects the rural production activities in the area.</p> <p>Add to the explanation that productive capacity of the land for productive purposes when all the components required for production are available.</p> <p>Delete the word landscape in the 2nd paragraph of the explanation so that it refers to rural character, not just rural landscape character.</p>
		Methods for Issue 5		The methods should make explicit reference to the need to manage potential reverse sensitivity effects on rural production activities	That the 6 th bullet point of the methods be amended by adding "including potential reverse sensitivity effects on rural production activities".

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/047 Continued	Horticulture New Zealand	Issue 5A		Explanatory text that follows Issue 5A needs to be amended to reflect the changes sought to the issue	That the text following Issue 5A be amended.
		Objective 1A	Oppose	Objective 1A is not supported because of the focus on highly versatile soils.	That the wording of Objective 1A be amended.
		Policies 1A.1 – 1A.5		Consistency required with changes sought to Objective 1A	That Policies 1A.1 – 1A.5 be amended to refer to soil and remove reference to highly versatile soils.
		Issue 5A		Consistency required with other changes sought so that the focus is on components of rural production activities and not just soil.	That the first 2 bullet points of Methods for Issue 5A be amended. Add to the last bullet point “including the potential for reverse sensitivity effects”
		Issue 5B		The addition to explanatory text of a description of reverse sensitivity would clarify the intent of Issue 5B.	That a description of reverse sensitivity be added to the Explanatory text of Issue 5B.
		Objective 1B	Support	Horticulture NZ supports the identification of reverse sensitivity is Objective 1B	That Objective 1B be retained.
		Policy 1B.3	Support	Horticulture NZ supports the intent of Policy 1B.3 to ensure that the rural production activities are not compromised by subdivision	That Policy 1B.3 be retained.
		Methods for Issue 5B		To provide consistency with changes sought to the Issue and objective.	That the 2 nd bullet point of the Methods for Issue 5B be amended to include reference to reverse sensitivity. Amend the last bullet point by adding, including the potential for reverse sensitivity effects.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/047 Continued	Horticulture New Zealand	Section 2.4 Anticipated Environmental Results	Support	Horticulture NZ supports the inclusion of the 3 rd bullet point to be added to Anticipated Environmental results as it seeks to ensure that the potential for reverse sensitivity is addressed.	That the 3 rd bullet point be retained.
		Appendix 1 of Chapter 2		Appendix 1 requires a greater focus on the rural production activities that occur in the rural environment. The language used should be that which the general public can appreciate and understand.	That all the descriptors in Appendix 1 be reworded to use common language and to better reflect the rural production environments.
		Rule 19.4.2.A		Changes sought to be consistent with changes sought to the Objectives and policies	That Rule 19.4.2.A be amended Delete (i) 2 nd bullet and replace with "the productive capacity of the land for rural production activities" Amend (x) to refer to 'potential reverse sensitivity effects Amend the last bullet point in 19.4.2.A (i) to read "the degree to which a proposed Conservation Lot is likely to avoid remedy or mitigate the adverse effects on any natural habitat that would be adversely affected by the subdivision."
		Rule 19.4.2.B		To manage the potential for reverse sensitivity a larger side and rear boundary setback should be provided	That Rule 19.4.2.B be amended by changing the Building setback (d) to include : For dwellings a setback of 25 metres from any side or rear boundary.
		Rule 19.4.2.C		Consistency required with other changes sought.	That all references to Highly Versatile soils be deleted and class all subdivision in each area on the effects on productive capacity of land.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/047 Continued	Horticulture New Zealand	Rule 19.5.1		Given the potential for reverse sensitivity effect it is considered that it is inappropriate to apply a non-notification clause. Notification should be assessed on a case by case basis.	That an additional bullet point be added to Rule 19.5.1 (a) (vii) the potential for reverse sensitivity Delete the non notification clause in respect of Rule 19.5.1.(b), (c) and (d)
		Rule 19.5.2		Clause 19.5.2 (a) (iii) is supported however given the potential for reverse sensitivity effect it is considered that it is inappropriate to apply a non-notification clause. Notification should be assessed on a case by case basis.	That Rule 19.5.2 (a) (iii) be retained Delete the non notification clause in respect of Rule 19.5.2 (a).
		Rule 19.6	Oppose	Horticulture has sought that there be no non-complying activities in the Plan	That Amendment 18 be deleted.
		Rule 19.6		Activities not meeting Rules 19.4.2.C or 19.6.2 should be assessed as Discretionary Activities.	Delete from Rule 19.7.2 (b) the following text "provided that the conditions for Discretionary activities in Rule 19.8.1 are met".
		Rule 19.8	Oppose	Consistency with other changes sought to have no non-complying activities.	That Rule 19.9 be amended to Discretionary Activities.
		Section 24A.1		Currently there is no general criteria that assesses the potential for reverse sensitivity.	That an additional criterion be added to 24A.1.1 General Assessment Criteria. Potential impacts on cross property damage Potential for reverse sensitivity effects on rural production activities and any mitigation measure proposed.
		Section 24A.1.3.1		While the guidelines may assist in the development of subdivision they should not be given a regulatory status as they may conflict with the Objectives, Policies and	That the Rural Zone Criteria 24A.1.3.1 (a) be deleted.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/047 Continued	Horticulture New Zealand	Design Guide		<p>Methods in the Plan.</p> <p>The introduction section includes descriptions of key terms such as amenity values, landscape character, natural character and rural character. The Outcomes which are essentially objectives, policies, methods and anticipated environmental results.</p> <p>It is more appropriate for such matters as the key terms and outcomes to be included in the Plan rather than as a schedule to the Plan.</p> <p>Guidelines assist with the design methods which is the purpose of the Design Guide so are appropriate to be retained.</p>	That the first three sections of the Rural subdivision design guide – Introduction, Process and Outcomes be deleted and retain the Guidelines and Appendices.
		Planning Maps		Consistency required with other changes sought to the Plan Change.	Amend Planning maps to refer to Rural Production Environments and not Landscape Domains.
20/048	MC ² Group Ltd		Neutral	<p>The design guides for rural subdivision do not require a broad enough examination of the peripheral characteristics of the adjoining properties, thereby allowing ecological, cultural and physical connections to be enhanced.</p> <p>The Design Guides give little clue about how they achieve the desired outcomes when the built form is considered.</p> <p>There appears to be little incentive, through mechanisms such as a discretionary density bonus and the ability to transfer development rights, to go beyond the scope</p>	That further information is provided and the opportunity to be involved in clarifying the matters raised.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/048 Continued	MC ² Group Ltd			of traditional development and to achieve advances in design, planning, ecological restoration, community/affordable/workforce housing and other areas.	
20/049	Landlink Ltd		Neutral	<p>The design guides for rural subdivision do not require a broad enough examination of the peripheral characteristics of the adjoining properties, thereby allowing ecological, cultural and physical connections to be enhanced.</p> <p>The Design Guides give little clue about how they achieve the desired outcomes when the built form is considered.</p> <p>There appears to be little incentive, through mechanisms such as a discretionary density bonus and the ability to transfer development rights, to go beyond the scope of traditional development and to achieve advances in design, planning, ecological restoration, community/affordable/workforce housing and other areas.</p>	That further information and the opportunity to be involved in clarifying the matters raised.
20/050	Colyer Mair Assets Ltd		Oppose	Oppose all provisions that would affect the ability of the submitter to carry out its existing business or to create reverse sensitivity issues.	That the plan change be amended to avoid adverse effects on submitter's property and ability to undertake existing activities.
20/051	Horizons Regional Council			Horizons is complementary of the approach the HDC has taken to the increasingly complex issue of rural subdivision and in managing a balance between this and the potential adverse effects on the environment.	
		Issue 5 and 5B		Inconsistent wording of Issue 5	Adopt the wording of Issue 5 used for Amendment 8.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/051 Continued	Horizons Regional Council	Objective 1	Support	Objective 1 is supported	That Objective 1 be retained.
		Policies 1.1-1.16	Support	Support Policies 1.1 – 1.16	That Policies 1.1 -1.16 be retained.
		Policies CE.1 – CE.12	Support	Support Policies CE.1 – CE.12	That Policies CE.1 – CE.12 be retained.
		Policies FD.1 – FD.6	Support	Support Policies FD.1 – FD.6	That Policies FD.1 – FD.6 be retained.
		Policies CL.1 – CL.8	Support	Support Policies CL.1 – CL.8	That Policies CL.1 – CL.8 be retained.
		Policy MO.4	Support	Support Policy MO.4	That Policy MO.4 be retained.
		Policies TT.2, TT.4, & TT.6	Support	Support Policies TT.2, TT.4, & TT.6	That Policies TT.2, TT.4, & TT.6 be retained.
		Policies LO.2, LO.3 & LO.5	Support	Support Policies LO.2, LO.3 & LO.5	That Policies LO.2, LO.3 & LO.5 be retained.
		Policies K.4 & K.5	Support	Support Policies K.4 & K.5	That Policies K.4 & K.5 be retained.
		Policies MD.2 & MD.5	Support	Support Policies MD.2 & MD.5	That Policies MD.2 & MD.5 be retained.
Policy HC.4	Support	Support Policy HC.4	That Policy HC.4 be retained.		
Hill Country Policies		There is a policy within each of the other Domains, that addresses natural habitats and the margins of rivers, streams and wetlands and remnant indigenous forest areas. There is no similar policy for the Hill Country domain.	That a new policy be added to the Hill Country Domain Policies “Ensure that the natural habitats, particularly remnant indigenous forest areas, riparian areas adjacent to river and stream corridors and wetland areas, are identified and protected from inappropriate subdivision and development”.		
Issue 5B(i)	Support	Support Issue 5B(i)	That Issue 5B(i) be retained		

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/051 Continued	Horizons Regional Council	Objective 1B	Support	Support Objective 1B	That Objective 1B be retained
		Policies 1B.1, 1B.2 & 1B.4	Support	Support Policies 1B.1, 1B.2 & 1B.4	That Policies 1B.1, 1B.2 & 1B.4 be retained.
		Section 2.4 Anticipated Environmental Results	Support	Support inclusion of Section 2.4 Anticipated Environmental Results	That Section 2.4 Anticipated Environmental Results be retained.
		Appendix 1 of Chapter 2	Support	Support Appendix 1 : Rural Environment Landscape Assessment	That Appendix 1 of Chapter 2 be retained.
		Amendments 13, 14, 15, 16	Support	Support Amendments 13, 14, 15, & 16	That Amendments 13, 14, 15, & 16 be retained.
		Section 24A Assessment Criteria	Support	Support Section 24A Assessment Criteria	That Section 24A Assessment Criteria be retained
20/052	Pritchard Group Ltd		Oppose	Opposes plan change as it does not promote sustainable management of natural and physical resources and has not been adequately considered in terms of costs and benefits of the new provisions. The plan change has not been appropriately considered with respect to those matters a territorial authority needs to address. Plan Change 20 and 21 are inextricably linked and therefore both Plan Changes should not be documented and promoted separately.	That the status quo remain with the existing Operative District Plan provisions maintained Or Alternatively the Council could amend the plan changes to remove all references to Landscape Domains and provisions and inserts assessment criteria relating to consistency with the Rural Subdivision Design Guide for the existing rural subdivision rules.
			Support	Supports managing the productive capacity of rural land in the Horowhenua (highly versatile soils). Supports managing outstanding landscapes and features and	

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/052 Continued	Pritchard Group Ltd		Oppose	those matters identified in Section 6 of the RMA. Opposes the introduction of the provisions dealing with Landscape Domains	That the Plan Change be amended by deleting the plan change and develop new provisions for the Rural zone based on the purpose and principles of the Act, incorporating appropriate methods that deal with policy overlays for the Coastal Sand Country, Inland Plains and River Terraces, class 1 and 2 soils, and the Hill Country. The Hill Country needs to be better defined and is more appropriately aligned with the conservation estate.
			Oppose	The current section 32 analysis is deficient for a plan change promoting such significant amendments to an Operative Plan.	
20/053	Graham Halstead	Rule 19.4.2.C HV soils in Levin-Koputaroa Levin- Ohau Taranua Terraces Domains		There should be no further subdivision of highly versatile soils except for boundary adjustments. Highly versatile soils (HV) should be for primary production not housing. Allowing 10ha subdivision will encourage larger farms to be subdivided into much larger lifestyle blocks, and will hasten the demise of full time farms. Increasing the lot sizes will have an inherent potential for subdivision and therefore make it prohibitive for local farmers to expend their farms. Future subdivision is more than adequately provided for in the non HV soils domains and other domains. There are also more	That the Plan Change be amended be deleting all references to allowing subdivision, replace with words "No further subdivision permitted".

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/053 Continued	Graham Halstead			than adequate existing small holdings on HV soils for part-time farming and specialist rural activities	
20/054	FRP Investments Ltd & FRP Agriculture Ltd	Policies 1.1 – 1.16		The rural environment landscape assessment correctly identifies that existing large scale forestry has significantly affected the landscape character of the coastal environment and provide opportunities for development both in their visual absorption capability and opportunities to re-establish native species. The objectives, policies and rules in the plan change fail to recognise and provide for this potential.	That additional policies be added to the existing policies in the Rural Environment Wide Policies 1.1 to 1.16 to recognise, acknowledge and promote the potential of currently forested areas for low density rural residential development where there is reasonable access to, services, roading and community infrastructure.
		Policies CE.1 – CE.12			That the Coastal Environment Domain Policies CE.1 – CE.12 be amended to recognise, acknowledge and promote the potential of currently forested areas for low density rural residential development where there is reasonable access to, services roading and community infrastructure.
		Policies 1B.1 & 1B.2			That the explanation to Issue 5 be amended to recognise that large scale processing, infrastructure facilities and intensive farming is required to operative within a regime of consent conditions or plan rules that existing to ensure that adverse effects beyond the boundary of their site are controlled and mitigated. This should be taken into account in terms of determining the suitability of nearby applications. Amend Policies 1B.1 and 1B.2 to reflect this.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/054 Continued	FRP Investments Ltd & FRP Agriculture Ltd	Policy 1B.2	Support		That Policy 1B.2 be amended by replacing "restrict" with "control". Make consequential explanatory amendment to the explanation and principle reasons.
		Appendix 1 of Chapter 2	Support		That Appendix 1 of Chapter 2 be retained and more particularly its acknowledgement of the potential of existing forested areas in the Coastal Environment.
		Rule 19.7 & 19.8	Oppose	Resource Management (Simplify and Streamline) Amendment Bill 2009 proposes to remove the Non-complying consent classification.	That the proposed Discretionary Activity rules be deleted and replaced with the Non – Complying Activity rules.
		Rule 19.9	Oppose		That Rule 19.9 Non-Complying Activities be deleted.
		Section 24A Assessment Criteria	Support		That Section 24A Assessment Criteria be retained and amended to recognise, acknowledge and promote the potential of currently forested areas for low density rural residential development where there is reasonable access to services, roading and community infrastructure.
20/055	Nathan Masters		Oppose	The proposed plan change lacks common sense. Creative and innovative subdivisions should be encourage. The draconian initiatives are going to limit the growth of Horowhenua.	That the minimum lot size remains at 2000m2. Remove the subdivision type Remove the restricted subdivision opportunities for sensitive landscape areas such as the coastal environment and coastal lakes domains.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/056	Woodhaven Gardens Limited			It is all very well to limit a farmer's ability to subdivide so that the area retains its rural character. However farmers need to be able to use the land to farm. Resources need to be accessible to allow farming to continue in this area. Without water it is impossible to farm economically in this area. If Council wishes to limit farmer's ability to subdivide and maintain farming then Council needs to pressure the Regional Council with respect to water rights	That Plan Change 20 be amended to the effect that where an owner of highly versatile soils has applied for water resources and has been declined that right to water, and this make the land uneconomic for farming in the manner that the farmer and previous owners have farmed the land, that the owner is able to subdivide.
20/057	B.J. O'Grady		Neutral	Consideration of Plan Change 20 in relation to existing subdivision application lodged with the Council in 2004. It would be neither fair nor reasonable for the Council to consider the plan change when determining this application.	Inferred: That the Council provides the submitter with a reassurance that Plan Change 20 will not be considered when determining the subdivision application RS 1166.
		Rule 19.3(b) Table 19.4.2.C	Oppose	Seems unreasonable that a large rural land holding in the Hill Country can not be subdivided in some way other than a boundary adjustment as a Controlled Activity. Any visual effects associated with the construction of a dwelling and accessory buildings on a 100ha lot would be less than minor given the scale of the land holding.	That an additional column be added to Table 19.4.2.C which allows any number of lots with a minimum lot size of 100ha.
		Rule 19.8.1 Table 19.6.2		Allow Hill Country land to be subdivided to 40 hectares as a Limited Discretionary Activity.	That the row in Table 19.8.1 relating to the Hill Country Domain be transferred to Table 19.6.2
		Rule 19.5.2(a) (ii), (iii) & (iv)	Oppose	The duplication between the Controlled and the discretionary matters is unnecessary	That 19.5.2(a) (ii), (iii), & (iv) be deleted.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/057 Continued	B.J. O'Grady	Rule 19.5.1 (d)		This rule provides for Conservation lots to be created in all landscape domains except the Hill Country, it should be encouraged in the Hill Country domain	That Rule 19.5.1(d) be amended by removing the words "except in the Hill Country landscape domain".
		Rule 19.6.1(ii)		The wording of this rule makes no provision for conservation lots to be transferred to the ownership of a public body such as the Department of Conservation or Council.	That Rule 19.6.1 (ii) be amended to allow ownership of Conservation Lot land to be transferred to a public body.
		Rule 19.7.1(a)	Oppose	Consistency with other changes sought Rule 19.7.1 would become redundant	That Rule 19.7.1 be deleted
		Rule 19.7.2(a) Table 19.8.1		Greater flexibility is required when subdividing land within the Hill Country domain. It would be more appropriate to provide smaller lots which can be designed to blend in the surrounding environment.	That Rule 19.7.2(a) and Table 19.8.1 be amended to allow multiple lots, with a minimum lot size of 5 ha and a minimum average lot size of 40 ha.
20/058	Federated Farmers of New Zealand	Plan Change 20	Support	The Federation generally supports the plan Change, with the suggested amendments below.	
			Oppose	While the Federation generally supports the intent of the plan change, we oppose using soil classes as the basis for imposing restrictions to protect productive land. The proposed approach also fails to take into account other important factors that determine productive value such as slope, temperature, water availability, electricity and labour.	Retain the flexibility to interpret productive soils according to market based land use. Delete reference to Highly Versatile soils as a basis for protection or land classification.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/058 Continued	Federated Farmers of New Zealand	Policies 1.5 & 1.7 Issue 5A discussion Section 2.4 – outcome 3 Rule 19.4.2.A (x) Rule 19.5.2(a)(iii) Sec 24A.1.1(d) Sec 24A.1.4.4(b) Sec 24A.1.4.5(i) Sec 24A.1.4.6(e) Sec 24A.1.4.7(e) Sec 24A.1.4.8(e)	Support	The Federation strongly supports the recognition or and provision for reverse sensitivity effects. Newcomers to the rural area need to recognise and acknowledge that production activities are legitimate rural activities and should be allowed to continue	That the provision for reverse sensitivity effects to be addressed when new activities take place be retained.
		Introduction	Oppose	Explanation of non-complying activities should be extended to explain more clearly to plan users what level of requirement is needed for an application.	Add to the explanation of a non-complying activity “And consent may only be granted where the adverse effects will be minor or the activity is not contrary to the objectives and policies of the Plan.” (Or words to that effect).
		Issue 5A	Support	The Federation supports the recognition of and provision for, productive uses that may not be currently present in the district. It is important to recognise that the rural area is subject to change use over time, based on market demand.	
		Issue 5B(ii)	Oppose	Issue 5B should be reworded more positively, and present a more accurate view that the expectations are on new residential activities to solve any reverse sensitivity issues, and not the primary production activities.	That issue 5B(ii) be amended to read; “The incompatibility between residential uses and production activities and large scale processing and infrastructure facilities” (or words to that effect).

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/058 Continued	Federated Farmers of New Zealand	Policy 1A.1	Oppose	Minor writing error – “scale” is written twice.	That the second reference to “scale” be removed from Policy 1A.1 so that it reads “Manage the scale, intensity, and design ...”
		Policy 1A.4	Oppose	The wording of the policy should be consistent with the duties of the Council under the Act, and refer to the life-supporting capacity rather than the sustainability of the soil. As currently written, the application of the policy is overly subjective and vague.	That Policy 1.4A be amended to read “Ensure that land use activities on highly versatile soils are undertaken in a manner that safeguards the life-supporting capacity of the soil” (or words to that effect)
		Policy 1A.5	Oppose	The policy as currently worded is overly subjective. It covers the same issue as Policy 1A.4 so is unnecessary.	That Policy 1A.5 be deleted.
		Issue 5A Methods 1 & 2	Oppose	While the Federation recognises the place of high class soils in primary production, it may not always be appropriate to limit land use activities based on soil class.	That Method 1 for Issue 5A be deleted. That reference to Highly Versatile Soils in Method 2 for Issue 5A be deleted.
		Methods for Issue 5A	Oppose	The Council seems to be referring to the pre-2003 version of the Act, which prohibited subdivision in the circumstances listed.	That Issue 5B paragraph 2 be amended by replacing “must not” grant a subdivision consent unless those adverse effects can be avoided, remedied or mitigated with: “Has the discretion to refuse resource consent, or impose conditions relating to avoiding, remedying, or mitigating those effects, in addition to those that may be listed in the relevant rule” (or words to that effect).

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/058 Continued	Federated Farmers of New Zealand	Methods for Issue 5B	Oppose	The phrase thoroughly assessed is unclear and implies that Council will not otherwise thoroughly assess applications. The phrase should be rewritten for clarity.	That the final paragraph for Methods for Issue 5B be amended by replacing "will be thoroughly assessed" with "Will be assessed accordingly to the conditions for a limited discretionary activity" (or words to that effect).
		Rule 19.4.2.B	Support	The importance of reverse sensitivity should be provided for in the conditions applying to all Rural Landscape Domains, through an additional condition requiring a non-compliant covenant to be registered on new titles created.	That a condition be added to Rule 19.4.2.B to read "Reverse Sensitivity: A covenant shall form part of the documentation supporting the subdivision consent application (which shall be registered on the additional titles created) specifying that no complaints shall be made in relation to the effects of any primary production activities lawfully occurring as at 10/01/2009, including effects such as noise, odour, dust, or visual effects. Such covenant need not apply to the certificates of title that contain any dwelling that existed prior to any subdivision" (or words to that effect).
		Rule 19.4.2.C(i) Rule 19.6.2(i) Rule 19.8.1	Oppose	Conditions providing for minimum balance lots and large minimum lot sizes may not be the most efficient way to achieve the Council's intention of maximising production land post-subdivision. The Federation considers that a more effective to enable rural productive land to be maximised while providing for limited subdivision is to provide for a limited number of smaller subdivisions. This will encourage cluster development and also allow less land to be removed from the production parent lot and taken up in the	That Rule 19.4.2.C(i) be amended to read Levin-Koputaroa HV Soil: 2 additional lots (1 lot shall contain an existing dwelling, both lots to be created at the same time.) Levin-Ohau HV Soil 2 additional lots (1 lot shall contain an existing dwelling, both lots to be created at the same time.) Taranua Terraces HV Soil: 2 additional lots (1 lot shall contain an existing dwelling, both lots to be created at the same time.) That Rule 19.6.2(i) be amended to read:

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/058 Continued	Federated Farmers of New Zealand			new lots.	<p>Kuku: 1-2 additional lots minimum lot size 5000m2 Remainder of parent lot is to have a covenant placed on the title to prevent further subdivision under 10ha.</p> <p>Levin-Koputaroa HV Soil: 1-2 additional lots minimum lot size 5000m2 Remainder of parent lot is to have a covenant placed on the title to prevent further subdivision under 10ha.</p> <p>Levin-Ohau HV Soil: 1-2 additional lots minimum lot size 5000m2 Remainder of parent lot is to have a covenant placed on the title to prevent further subdivision under 10ha.</p> <p>Moutoa-Opiki Plains: 1-2 additional lot sizes 5000m2 Remainder of parent lot is to have a covenant placed on the title to prevent further subdivision under 20ha.</p> <p>Tararua Terraces Non HV Soil: 1-2 additional lots</p> <p>Tararua Terraces HV Soil: 1-2 additional lots minimum lot size 5000m2 Remainder of parent lot is to have a covenant placed on the title to prevent further subdivision under 15ha average.</p> <p>Notes 3, 4, 6, 7: Averaging shall only be applied where more than 3 additional lots are being created.</p> <p>That Rule 19.8.1(i) be amended to read: Moutoa-Opiki Plains: 1-2 additional lots</p>

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/058 Continued	Federated Farmers of New Zealand				minimum lot size 5000m2 20ha minimum average lot size Remainder of parent lot is to have a covenant placed on the title to prevent further subdivision under 20ha. Notes 3, 5, 6: Averaging shall only be applied where more than 3 additional lots are being created.
		Rule 19.5.1	Oppose	The negative effect on neighbouring productive activities, such as past management, included as a consideration for applications, either through an additional matter for discretion, or through the ability of neighbouring whose productive activities will be negatively affected to participate in the hearing process.	That Rule 19.5.1(d) be amended by adding a discretionary matter to read: "The impact on production activities" (or words to that effect). Alternatively Amend the reference to written approval of affected persons to read: The written approval of affected persons will not be necessary in respect of Rule 19.5.1(d) except where the production activities of affected persons will be negatively impacted (or words to that effect).
		Rural Subdivision Design Guide	Oppose	Page 6 of the Design Guide lists "Fresh air and the absence of foul smells or excessive dust" as one of the amenity values of the rural area. While the rural area may be free from congestion and associated fumes, this description is not necessarily accurate and may present unrealistic expectations for rural living. Rural areas are characterised by agricultural related smells, some of which may be considered foul by some, and agricultural practices such as soil cultivation and using farm races may produce dust.	That the bullet point on page 6 of the Design Guide stating "Fresh air and the absence of foul smells or excessive dust" be deleted.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/059	Coastal Lakes Station: Graham Sexton & Family			<p>Supports the general intent of Plan Change 20 to sustainably manage rural land, however opposes the provisions proposed to control subdivision. The Plan change does not go far enough to achieve sustainable management. Reverse sensitivity is only specific to primary production activities and large scale processing and infrastructure facilities only.</p> <p>Currently no assessment criteria for reverse sensitivity issues.</p>	<p>That a specific objective and supporting policy be included, requiring the avoidance of reverse sensitivity issues that may compromise the efficient and effective operation of permitted rural activities and lawfully established activities within the rural zone.</p> <p>That measures to avoid reverse sensitivity issues created by subdivision in the Rural zone be made for an assessment criterion for the entire Rural zone including the Coastal Environment Landscape Domain.</p> <p>That the assessment criteria for reverse sensitivity be more robust than currently worded to account for the full range of activities within the rural environment.</p> <p>Amend current wording to read “The provision to avoid or mitigate reverse sensitivity effects where the nature of subdivision is likely to generate the potential for complaints about existing activities permitted in the Rural zone and lawfully establish activities.”</p> <p>That either Refinement be made to the Controlled Matters (i) – (xvii) of Section 19.4.2.A to make the matters Council reserves control over certain and linked to clear controlled standard of the District Plan and supported by clear policies. Or</p>

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/059 Continued	Coastal Lakes Station: Graham Sexton & Family				Any subdivision of the Rural zone be made a Discretionary Unrestricted Activity. That the minimum lot size for the Coastal Environment Landscape Domain be set higher than 5000m2. A 2ha minimum lot size is recommended for all land in the Rural zone where the minimum lot size is currently proposed at 5000m2.
20/060	Rangeview Limited and M.J. Page		Oppose	Inadequate section 32 analysis, as the analysis is deficient in relation to the cost of implementation and administration. The Plan Change would put unnecessary costs on the ratepayers, when it could have been included as part of the District Plan review.	That Plan Change 20 should be shelved. Any changes should be initiated through the District Plan Review. Status quo to remain in the interim.
20/061	New Zealand Pork		Support	NZ Pork generally supports the approach of distinguishing primary production areas; and concentrating rural-residential developments onto existing settlements.	
			Support	Support in part. NZ Pork acknowledges the delineation of the district into zones based on productive capacity and potential, but questions the titles of delineated areas as being "landscape domains".	That the Landscape Domains be re-titled Primary Production Zones (or similar).
		Issue 5B Objective 1B Policy 1B.3 Methods for Issue 5B	Support	Issue 5B seeks to protect the efficient operation and viability of existing primary production activities from reverse sensitivity issues arising from subdivision in rural zones. NZ Pork supports the clear statements of the issue, objective and policy.	That an amendment to the methods for Issue 5B be made to specify that conditions on resource consents for subdivisions include specific mention of no complaints covenants.

Submission No.	Submitter Name	Issue/ Provision	Support/ Oppose	Summary of Submission	Decision Sought
20/061 Continued	New Zealand Pork	Appendix 1 of Chapter 2	Support	The landcover on the Foxton Dunefields has changed through time from forest to bracken/scrub, then flax farming, through to pastoral. With the removal of much of the earlier vegetation cover, the soils are generally drier and more vulnerable to erosion. It is appropriate to acknowledge the benefits of building up soil organic matter, e.g. with the application of animal manure.	That the Opportunities and Constraints for the Foxton Dunefields be expanded to include a statement that reads "The opportunity exists to use development as a means to stabilise the soils and enhance the productive potential of the zone through the application of animal manure to increase soil organic matter and water holding properties".
20/062	John Hewitson	Map 39 Minimum lot size.		Waikawa Beach and surrounding land back to Waikawa Heights should be all designated Coastal Environment. The area should not have a Lakeland type designation. The creation of man made lakes or ponds will dramatically increase the number of swamp flies and mosquitoes. New residential blocks should be kept to a minimum and the size of each block be no smaller than 5000m ² . That there must be no new lakes created. Any new residences be built on suitable existing sites.	That the Coastal Environment Domain be extended to include the surrounding land back to Waikawa Heights. That there should be no Lakeland type of designation. That there should be no new lakes created and any new residences should be built in suitable existing sites. That new residential blocks be kept to a minimum and be no smaller than 5000m ² .

Further Submissions must be received by the Horowhenua District Council
before **5:00pm 27 April 2009.**