

Horowhenua District Plan

Proposed Plan Change 2

(Review of Residential Development Provisions - Amendments relating to the extent of the Medium Density Overlay and infill subdivision; provision for second residential dwelling units and Integrated Residential Development; revision of the Medium Density Residential Development Design Guide; minor corrections or amendments)

Summary of Submissions (Ordered by Submitter)

February 2018

1. Introduction

This document, Summary of Submissions, summarises the decisions requested for each submission received on Proposed Plan Change 2. 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 2 was publicly notified on 3 November 2017 with the period for submissions closing on 5 December 2017.

A total of 19 submissions were received in relation to the proposed change, and this document provides a summary of those submissions in accordance with Clause 7 of Schedule 1 of the Resource Management Act 1991 (RMA).

It also includes the names and addresses of submitters so that they may be served a copy of any further submissions relating to their submission.

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

- Horowhenua District Council's Levin office: 126 Oxford Street, Levin.
- Te Takeretanga o Kura-hau-pō: Bath Street, Levin.
- Te Awahou Nieuwe Stroom: Main Street, Foxton
- Shannon Library: Plimmer Terrace, Shannon.

The full submissions can also be viewed or downloaded from Council's website: www.horowhenua.govt.nz/PPC2

2. Further Submissions

Further submissions must be in accordance with Clause 8 of Schedule 1 of the RMA. They can only support (in whole or in part) or oppose (in whole or in part) the submissions received on the proposed change, including any associated reasons. In supporting or opposing a submission only those matters raised in the original submission may be commented on.

The following persons may make a further submission in support of, or in opposition to, submissions already received:

- Any person representing a relevant aspect of the public interest; and
- Any person that has an interest in the proposed plan change greater than the interest that the general public has; and
- Horowhenua District Council itself.

Any further submission should be made using Form 6 of the Resource Management (Forms, Fees, Procedures) Regulations 2003 or closely follow this format. Failure to include all necessary information or to complete the form correctly may prevent the further submission from being considered. Further Submission forms (Form 6) can be obtained from the Council Service Centres and Public Libraries or found on Council's website:

www.horowhenua.govt.nz/PPC2

Further submissions will need to be supplied to Horowhenua District Council by **4:00pm on Monday 19 February 2018**.

Further submissions can either be:

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

Posted to: Strategic Planning, Horowhenua District Council, Private Bag 4002, Levin 5540

Faxed to: (06) 366 0983

Emailed to: districtplan@horowhenua.govt.nz

Filled in online at: www.horowhenua.govt.nz/PPC2

Important: Any person making a further submission on Proposed Plan Change 2 is required under Clause 8A of Schedule 1 of the RMA to send a copy of it to the person who made the original submission. The copy must be sent to the original submitter within five (5) working days of submitting the further submission to Horowhenua District Council.

Section 5 of this document includes the address for service of each person or organisation that has made a submission on Proposed Plan Change 2.

3. Process from here

Once the Further Submission period has closed (19 February), a hearing date will be set and a Planning Report identifying and summarising all the submissions received will be produced. The Planning Report will provide an impartial assessment of the merits of these submissions, including whether the matters raised are valid considerations under the RMA. It will also contain any recommended amendments to the Plan Change to address matters raised by submitters.

Before a formal Council hearing is held, a pre-hearing meeting may be held to help clarify, mediate or facilitate a resolution on any matters raised in 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. Submitters 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 formal notice of the decision on the Plan Change, including the reasons behind the decision reached. The decision will also be publicly notified.

Any submitter who is not satisfied with the decision has the further opportunity, under Clause 14 of Schedule 1 of the RMA, to lodge an appeal with the Environment Court.

4. Additional Information

For more information please contact Caitlin O'Shea or David McCorkindale via:

Phone on 06 366 0999

Email at districtplan@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 2. Each submission has also been assigned a unique reference number (e.g. 02/01).

The purpose of this table is to help any person who makes a further submission to meet their legal obligation to supply a copy of their further submission to the person who made the original submission. The copy must be sent to the original submitter within five (5) working days of submitting the further submission to Horowhenua District Council.

Sub. No.	Submitter Name	Address for service	Wish to be heard
02/01	Colleen Tyree	232 Kimberley Road RD1 Levin 5571	No
02/02	C. Lahmert		No
02/03	Anthonie van Rijn	16 Holben Parade Foxton Beach 4815	Yes
02/04	Heritage New Zealand - Finbar Kiddle	Heritage New Zealand PO Box 2629 Wellington 6140 Attention: Finbar Kiddle	No
02/05	Geoffrey Roy Willmott	3 Beechwood Avenue Levin 5510	Yes
02/06	Veronica Harrod	8 Arthur Street Waikawa Beach RD31 Levin 5573	Yes
02/07	Radha Sahar	45A Fairfield Road Levin 5510	No

Sub. No.	Submitter Name	Address for service	Wish to be heard
02/08	Potangotango - Anne-Marie Hunt	17 Nash Parade Foxton Beach 4815	Yes
02/09	Geoffrey Maurice McGruddy	18 Marine Parade South Foxton Beach 4815	No
02/10	Powerco Limited - Simon Roche	Powerco Private Bag 2065 New Plymouth 4342 Attention: Simon Roche	No
02/11	Eco Tech Homes - Bruce Twidle	Eco Tech Homes c/- Bruce Twidle PO Box 1036 Levin 5510	Yes
02/12	Assembly of God Church of Samoa - Iakopo Toafa	Assembly of God Church of Samoa c/- Iakopo Toafa 35 Liverpool Street Levin 5510	Yes
02/13	Horowhenua District Council - Robinson Dembetembe	Horowhenua District Council – Regulatory Services Private Bag 4002 Levin 5540	Yes
02/14	Horizons Regional Council - Sarah Carswell	Horizons Regional Council c/- Sarah Carswell Private Bag 11025 Manawatu Mail Centre Palmerston North 4442	Yes
02/15	Truebridge Associates Limited - Susan Ingle	Truebridge Associates Limited c/- Susan Ingle 522 Queen Street Levin 5540	Yes

Sub. No.	Submitter Name	Address for service	Wish to be heard
02/16	Janice Swanwick	8 Laura Avenue Brooklyn Wellington 6021	No
02/17	Waitarere Beach Progressive Ratepayers Association - Sharon Freebairn	Waitarere Beach Progressive & Ratepayers Association Inc. c/- Sharon Freebairn 127 Park Avenue Waitarere Beach 5510	Yes
02/18	Landlink Limited - Ben Addington	Landlink Limited c/- Ben Addington PO Box 370 Waikanae	Yes
02/19	Pirie Consultants Limited - Philip Pirie	Pirie Consultants Limited c/- Philip Pirie PO Box 10050 Palmerston North 4441	Yes

6. Summary of Decisions Requested

The below table summarises the decisions requested or inferred by submitters to Proposed Plan Change 2. This is to enable people to establish whether a submission might be of interest to them. The summary is not a substitute for inspecting the original submission itself, and it is recommended that this is done once you have identified any submissions of particular interest.

In addition to the reference numbers assigned to the submissions received (i.e. 02/03 being Plan Change 2, Submission Number 3), a unique numeric identifier (i.e. 02/03.1) has also been applied to the specific points/matters raised in each submission in order to provide greater specificity and extra clarity. This unique identifier(s) should be specifically referenced in any further submission you may wish to make relating to an original submission.

The submissions below have been summarised in numerical order. An alternative document is also available that contains the submissions organised according to the issue or provision.

Where it has been specified or is clear that the submission is either in support of, or opposition, to the proposed change this has also been identified in the summary table below. The term 'In-part' has generally been applied in the table to submissions that provide qualified support or opposition to a proposed provision, subject to incorporating further suggested changes. 'Neutral' has been used where the submitter has specifically identified they are neutral and 'Not specified' has been used where the submitter has not indicated whether they support or oppose and it is not clear.

Where specific wording changes have been requested to Proposed Plan Change 2 by submitters these have been shown in the summary table as follows:

- Underlined text = New text to be included
- ~~Strikethrough text~~ = Text to be deleted

Sub. No.	Submitter Name	Issue/Provision	Support/In-part/Oppose	Summary of Submission	Decision Sought
02/01.1	Colleen Tyree	Whole plan change	In-part	Supports subdivisions but considers the area covered should include rural as well as residential areas.	Extend the area of proposed subdivision to include rural areas.
02/02.1	C. Lahmert	Whole plan change	Support	Supports the plan change as more housing and building options are needed.	Retain Plan Change 2 as proposed.
02/03.1	Anthonie van Rijn	Whole plan change	In-part	Supports the plan change as it will make development of medium density residential land at Foxton	Requests consideration be given to rezoning the block of land at Foxton Beach enclosed by

Sub. No.	Submitter Name	Issue/Provision	Support/In-part/Oppose	Summary of Submission	Decision Sought
				Beach that the submitter has interests in more economically viable.	Holben Parade, Barber Street and Chrystal Street to Medium Density Residential.
02/04.1	Heritage New Zealand - Finbar Kiddle	Amendment 1 – Rule 15.8.15 Matters of Discretion for Infill Subdivision	In-part	Supports matter of discretion (viii) as infill subdivision has the potential to adversely affect heritage resources in the vicinity of development.	Retain (viii) as proposed.
02/04.2	Heritage New Zealand - Finbar Kiddle	Amendment 3 – Rule 15.8.16 Matters of Discretion for Integrated Residential Development	Oppose	Notes that integrated residential development has the potential to adversely affect nearby heritage resources (e.g. the size or intensity of the development may be out of scale with a nearby heritage building), and that it is important that an appropriate matter of discretion is included so these effects can be considered.	Amend Rule 15.8.16(a) to include: <u>vii. Effects on significant sites and features, including natural, cultural, archaeological and historical sites.</u>
02/05.1	Geoffrey Roy Willmott	Whole plan change	Support	Supports the plan change for reasons including: changes in demographics, employment, interests, affordability, sustainability and practicality. Supports Council planning ahead and welcomes the opportunity to subdivide and sell. Is also sure that planning of related services to support future subdivision will be included to accommodate growth.	Retain Plan Change 2 as proposed.
02/06.1	Veronica Harrod	Whole plan	Oppose	Opposes adoption of the plan change, and considers that the	Defer the proposed plan change until 2018-2038 LTP consultation

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		change		<p>proposed changes should be discussed and priorities determined as part of the 2018-2038 Long Term Plan (LTP) consultation process as the LTP dictates the extent and shape of residential land development. Also considers that the proposed changes:</p> <ul style="list-style-type: none"> • will have repercussions on essential infrastructure such as water, stormwater and wastewater systems; • do not align with the current LTP community outcomes; and • have the potential to result in profoundly negative environmental and cultural effects such as increased discharge of stormwater into Lake Horowhenua, increased waste and pollution of waterways. <p>Further suggests that provisions relating to installation of water tanks and alternative systems built on green principles are required.</p> <p>Notes that residential communities do not have the essential infrastructure capability to sustain growth, and that third parties who don't have a vested interest in land development need to be included in the conversation around the nature</p>	has been completed and development contributions are re-introduced.

Sub. No.	Submitter Name	Issue/Provision	Support/In-part/Oppose	Summary of Submission	Decision Sought
				<p>and direction of future residential growth.</p> <p>Also suggests that development contributions should be re-introduced as existing residents should not bear financial responsibility for the impact of new development on existing essential infrastructure, and notes that there is a lack of detail concerning what 'large-scale integrated residential development' encompasses.</p>	
02/07.1	Radha Sahar	Increase in the number of permitted residential units on a site; Provision for large-scale, integrated residential development	Support	<p>Supports the plan change provided the 250m² sections are retained in the zone near the town centre as specified.</p> <p>Notes that several sustainability factors need to be more thoroughly taken into account and planned for in terms of environmental cost:</p> <ul style="list-style-type: none"> • On-site generation and disposal of stormwater, including percentage of free-draining land, soak hole/pits, harvesting rainwater, and green space for families; and • Sustainable building, including aspect, house size and style, provision of support/advice relating to 'green buildings', and planning for an eco-village or subdivision in the District. 	More thorough consideration of factors relating to stormwater and sustainable building.

Sub. No.	Submitter Name	Issue/Provision	Support/In-part/Oppose	Summary of Submission	Decision Sought
02/08.1	Potangotango - Anne-Marie Hunt	Whole plan change	Oppose	Opposes the proposal to introduce more intensive types of housing as this will increase stormwater runoff and reliance on off-site disposal. Notes that existing stormwater systems are inadequate and that no provision has been made for diverting Levin's stormwater from Lake Horowhenua. Considers there is a need to ensure that adequate stormwater disposal provisions are in place before development commences.	Place the plan change on hold until the infrastructure required to accommodate infill development is provided.
02/09.1	Geoffrey Maurice McGruddy	References to medium density lot sizes	In-part	Notes that there are a number of inconsistent references in the plan to lot sizes relating to medium density development, and that the plan should clearly state that in a medium density development 1 residential dwelling needs a minimum of 225m ² , 2 dwellings 445m ² , 3 dwellings 670m ² and so forth.	Check references to medium density lot sizes throughout the plan to ensure they are consistent.
02/09.2	Geoffrey Maurice McGruddy	Amendment 1 – Infill subdivision	In-part	Suggests retention of infill subdivision as a permitted or controlled activity, and to rely on the rules for permitted activities such as Rules 15.6.1, 15.6.6 and 15.6.8 to create certainty for developers.	Amend the plan change so permitted activity rules are applied evenly across infill and new subdivision. Class both activities as controlled (providing they meet the permitted activity rules) and evenly apply a minimum lot size of 250m ² .
02/09.3	Geoffrey Maurice McGruddy	Lot sizes	In-part	Suggests that site coverage should be maximised across both infill and	Amend the plan to reduce the size of living circles and increase

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				new subdivision to enable more affordable houses to be built. Notes that a 200m ² house would generally be built on an average subdivision lot size of 600m ² , at 35% site coverage. However, on a 250m ² lot, at 40% site coverage, would enable a more affordable 100 ² house to be built.	site coverage requirements (40%) applicable to all new houses to ensure consistency.
02/09.4	Geoffrey Maurice McGruddy	Boundary setbacks	In-part	Notes that the restriction of building closer than 4m to a road boundary should be reduced to 1.5m to allow flexibility in living space and a larger private space at the rear of the house to be created.	Amend the plan to reduce the 4m setback requirement from a front boundary to 1.5m.
02/10.1	Powerco - Simon Roche	Whole plan change	Neutral	<p>To ensure that it has the ability to continue to operate and maintain its established gas assets (including below ground distribution networks) and to offer an adequate and secure supply of gas to any new development it seeks the following to be taken into account in considering the plan change:</p> <ul style="list-style-type: none"> • Avoidance of inappropriate development in close proximity to a pipeline • Early consultation in relation to early development proposals • Minimum setback (2m) of any new buildings, structures or concrete surfaces from existing 	<p>Retain Policies 6.1.4, 6.1.9, 6.1.18, 6.3.4, 6.3.34, and 6.3.56.</p> <p>Amend Policy 6.1.15 as follows:</p> <p>Avoid, remedy or mitigate the adverse effects of new development and activities on the safe and efficient functioning of the existing and future roading networks <u>and existing utility infrastructure.</u></p> <p>Retain provisions in Chapter 15 relating to network utilities and energy activities.</p> <p>Amend 15.8.15 as follows:</p> <p>(vi) The provision of servicing, including water supply,</p>

Sub. No.	Submitter Name	Issue/Provision	Support/In-part/Oppose	Summary of Submission	Decision Sought
				<p>underground gas pipes</p> <ul style="list-style-type: none"> • Separation of new sensitive activities from established network utilities • The NZ Energy Strategy • Co-ordination of infrastructure provision with new development to minimise disruption and reduce cost • Required infrastructure upgrades to accommodate proposed increases in housing density 	<p>wastewater systems, stormwater management and disposal, telecommunications, and electricity <u>and gas</u></p> <p><u>(xvi) Manage the adverse effects of subdivision, use and development on network utilities, and require that new sensitive activities are appropriately separated from network utilities to minimise conflict and/or reverse sensitivity effects on the safe and efficient operation, upgrading, maintenance and replacement of existing lawfully established network utilities.</u></p> <p>Retain the definition of a Network Utility in Chapter 26.</p>
02/11.1	Eco Tech Homes - Bruce Twidle	Subdivision of existing residential properties	Support	<p>The submitter's business supplies factory built houses that come constructed in units to the property and are assembled onsite. Concerns include: an increase in worker's injury risk due to moving heavy equipment into and out of smaller properties; trucks not being able to get a house onto the property; and the access required for a 100 tonne crane to assemble the house units. Notes that boundary setbacks will need to be amended to accommodate larger houses on smaller sections.</p>	<p>Requests that fencing of right of ways is policed so that access to a rear section is a 3m clear road.</p>

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02/12.1	Assembly of God Church of Samoa - Iakopo Toafa	Whole plan change	Support	Supports the plan change.	Retain Plan Change 2 as proposed.
02/13.1	Horowhenua District Council - Robinson Dembetembe	Duplex-semi detached dwellings	In-part	Notes that further amendments to the daylight setback envelope and boundary setback are required to avoid the need for a land use consent if subdivision of a duplex or semi-detached dwelling is proposed.	Amend the plan so that where a party wall along two joined buildings is proposed, the recession plane and boundary setback requirements will not apply along the length and height of that wall.
02/13.2	Horowhenua District Council - Robinson Dembetembe	Infill subdivision in general	In-part	Notes that more clarity is required regarding which rule to apply for infill subdivision (i.e. pre-requisite conditions). Also suggests the need for specific policies and objectives relating to infill subdivision to give direction to developers in the planning stage and to assist decision makers in considering affected parties and desired environmental outcomes.	Amend Table 15-4 to include: <u>Sites that are between 900m² and 1500m² shall not create more than three lots, and the minimum net site area of each site shall be 330m².</u> <u>Sites larger than 1500m² shall not create lots less than 330m² and average of lots shall not be less than 600m².</u>
02/13.3	Horowhenua District Council - Robinson Dembetembe	Infill subdivision of 250m ² sections.	In-part	Notes that the main focus in assessing infill subdivision should not be character but the desired environmental outcomes sought (i.e. design, site layout, access, services).	Delete the following Matters of Discretion in Rule 15.8.15: (ii) The potential effects of the development and level of change to the character of the existing urban environment. (iii) The amalgamation of any proposed allotments or balance areas to existing titles of land. (vii) Provision of reserves,

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					<p>esplanade reserves, esplanade strips and access strips, including connections to existing and future reserves.</p> <p>(ix) Site contamination remediation measures and works.</p> <p>(x) Avoidance or mitigation of natural hazards. (Note: Refer to the "Risks and Responsibilities: Report of the Manawatu-Wanganui Regional Lifelines Project" (No. 2005/EXT/622) prepared by the Manawatu-Wanganui CDEM Group for information about natural hazards that may be relevant to the subject site).</p> <p>(xv) Those matters described in Sections 108 and 220 of the RMA.</p> <p>Note: Council encourages applicants to submit building plans (i.e. site plan and floor plan) at the time of subdivision where lots of less than 330m² in net site area are proposed, to demonstrate that a complying dwelling unit can be sited on each proposed lot.</p>
02/13.4	Horowhenua District Council - Robinson Dembetembe	Greenfield subdivisions	In-part	Notes that greenfield subdivisions in the Residential Zone should provide stormwater reticulation or	Amend the plan change to include a requirement to make provision for stormwater

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				attenuation systems, and not solely rely on soak pits. Considers that this is required to reduce the need for future capital expenditure when moving away from soak pits or on areas where soak pits do not work efficiently and there is poor soil drainage or a high water table.	reticulation or attenuation systems in residential greenfield subdivision.
02/13.5	Horowhenua District Council - Robinson Dembetembe	Site Coverage	In-part	Notes that site coverage of more than 40% on lots that are 250m ² or less should be treated as a non-complying activity. This is to discourage the overdevelopment of small lots, as the potential for adverse visual effects is greater. Also suggests that policies and objectives need to be developed around desired developments on smaller 250m ² lots.	Amend the plan change to make sites that are 250m ² and less, and with site coverage of more than 40%, a non-complying activity. Also amend to include policies and objectives around desired developments on smaller 250m ² lots.
02/13.6	Horowhenua District Council - Robinson Dembetembe	Amendment 2 – 15.4(c) Discretionary Activities	In-part	Notes there appears to be a discrepancy between the proposed amendment to Rule 15.6.1 and Rule 15.4(c) and a further change is suggested to improve the clarity of the rule.	Delete Rule 15.4(c) and replace with the following: <u>(c) Where the number of residential dwelling units and family flats does not comply with the permitted activity conditions in Rule 15.6.1</u>
02/14.1	Horizons Regional Council – Sarah Carswell	Whole plan change	In-part	Notes that the amendments would allow increased development in some areas within Flood Hazard Overlay Areas (FHOA), and that the existing provisions relating to FHOA will continue to give effect to Policy	Requests that consideration be given to excluding residentially zoned areas within the FHOA from the proposed provisions which allow increased density.

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				<p>9-2 of the One Plan.</p> <p>Suggests that Council may wish to consider whether it would be sensible, in terms of a risk reduction approach, to exclude areas within FHOA in the Residential Zone from the proposed provisions which allow increased density, noting that it has retained discretion to place conditions on consents for the avoidance or mitigation of natural hazards.</p>	
02/15.1	Truebridge Associates Limited - Susan Ingle	Section 32 Analysis	In-part	<p>Notes that there are currently large amounts of residentially zoned land with no infrastructure in place to cater for projected growth, and that associated development cannot be achieved without this infrastructure. Suggests that as the plan change will increase the amount of allotments that can be created within these areas that Council supply an indicative timeline to provide landowners and developers with certainty as to when they would be able to subdivide and develop these areas.</p>	Provide an indicative timeline of when infrastructure will be provided to those areas that are zoned Residential and are not currently serviced.
02/15.2	Truebridge Associates Limited - Susan Ingle	Amendment 1 – Infill subdivision	In-part	<p>Is uncertain about the activity status of infill subdivision, noting that the definition of it is rather vague and Table 15.4 and proposed Table 15.5 both refer to infill subdivision but with differing activity status and</p>	Requests the proposed infill rule in Table 15.5 be renamed and that the activity status of residential infill subdivision is clarified.

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				associated conditions. Considers that certainty of activity status is required for subdivision and suggests that the proposed new infill rule could be renamed to avoid confusion. Also notes that if the idea is to capture infill subdivision under both the current and proposed rules that this will make subdivision of larger lots more difficult, as to have a controlled activity will mean not doing infill and attaining an 18m diameter shape factor rather than a 13m one.	
02/15.3	Truebridge Associates Limited - Susan Ingle	Amendment 2 - Rule 15.6.1 Notional Net Site Area	In-part	Queries whether 'notional net site area' means 250m ² or 330m ² .	Clarify the meaning of notional net site area.
02/15.4	Truebridge Associates Limited - Susan Ingle	Amendment 6 – Section 2.1 Medium Density Residential Development Design Guide	In-part	Notes that the reference to infill subdivision in the Design Guide is confusing as it refers to proposed residential infill at 250m ² being a Controlled Activity when this is actually classified as a Restricted Discretionary Activity in the proposed plan change.	Amend reference to the activity status of 250m ² infill subdivision in Section 2.1 of the Design Guide to be consistent with the status in the proposed plan change.
02/15.5	Truebridge Associates Limited - Susan Ingle	Amendment 6 – Medium Density Residential Development Design Guide	In-part	Notes that the Design Guide has been amended but not the associated rules. References page 17 of the Design Guide which shows different layout configurations for two lots when the definition of Medium	Review illustrations in the Design Guide to ensure that they align with the definition of Medium Density Development.

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				Density Development means three or more units.	
02/15.6	Truebridge Associates Limited - Susan Ingle	Amendment 4 – Rule 15.6.8(d) Accessory Buildings	In-part	<p>Supports amending Rule 15.6.8 to enable accessory buildings to project forward of a dwelling on rear sites as it would not be visible.</p> <p>Also notes that current site coverage requirements in Rule 15.6.7(b) can be an issue where rear sites have a long right of way/access as it could make the net site area much smaller than the site area. Suggests tidying this up as part of the plan change to avoid uncertainty on how to implement this rule.</p>	<p>Retain Rule 15.6.8(d) as proposed.</p> <p>Amend Rule 15.6.7(b) to allow 40% site coverage on rear sites with a net site area under 500m² and a total area of over 500m².</p>
02/15.7	Truebridge Associates Limited - Susan Ingle	Amendment 1 – Rule 15.8.15 Matters of Discretion for Infill Subdivision	In-part	Queries whether building plans are required at the time of subdivision or would they just make for a better application, noting that most subdividers want to create a new section to sell but not develop.	Clarify whether building plans are a requirement for subdivision applications involving lots of less than 330m ² in net site area.
02/15.8	Truebridge Associates Limited - Susan Ingle	Amendment 3 – Rule 15.8.16 Matters of Discretion for Integrated Residential Development	In-part	Notes that 15.8.16(b) should be deleted as it is not in line with the current Resource Management Act. It refers to out of date sections, also public notification is now precluded for residential activities.	Delete proposed Rule 15.8.16(b).
02/16.1	Janice Swanwick	Amendment 1 – Infill subdivision	Oppose	Notes that the proposed 250m ² minimum lot size is too small, and	Withdraw Plan Change 2 and revisit proposals to increase

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				that it would change the character of Levin and affect sun, privacy and views of existing residents. Other effects noted include: on biodiversity due to a loss of mature trees and extensive home gardens; on infrastructure (i.e. stormwater runoff into Lake Horowhenua) and water supply; increased disposal of fill to the landfill, which already has problems (leaching); and increased pressure on health services. Also suggests that changing Levin and smaller towns in the District would make them less attractive to retirees and homes suitable for families would become unaffordable, reducing the District's ability to attract young families.	section availability.
02/16.2	Janice Swanwick	Amendment 5 – Planning Maps – Medium Density Overlay	Oppose	Notes that extending the Medium Density Overlay would make sections more valuable and increase rates, forcing people to subdivide or sell.	Withdraw Plan Change 2 and revisit proposals to increase section availability.
02/17.1	Waitarere Beach Progressive Ratepayers Association (WBPRA) - Sharon Freebairn	Amendment 6 – Sections 2.1, 4.4 and 4.5 Medium Density Residential Development Design Guide	Not specified	Notes that retaining the local character of Waitarere Beach was strongly advocated at WBPRA's recent public planning meeting. Also notes the following regarding the Design Guide: <ul style="list-style-type: none"> Terraced housing is better suited to Levin than coastal settlements and it is strongly suggested that 	Requests consideration of a two storey height restriction on new builds and renovations at Waitarere Beach. Retain guideline 4.5.27 of the Design Guide as proposed. Requests specification of water tank size to ensure they are

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				<p>a height restriction of two storeys for all new builds or renovations be introduced at Waitarere Beach.</p> <ul style="list-style-type: none"> • New developments should reflect the context of the neighbourhood allowing for attached dwellings in different styles. • Reducing the visibility of water tanks is agreed, but adequate size of tank relative to the building footprint should be specified. • There is no mention of grey water systems being introduced or compulsory installation of rainwater tanks, with grey water usage systems to better conserve and utilise water for gardens being recommended. • Provide for more energy efficient dwellings so they receive more mid-winter sun and store natural heat. • There is no mention of the added stress additional housing will impose on existing infrastructure, particularly stormwater and sewage. 	<p>adequate relative to the building footprint.</p> <p>Requests consideration of planning for grey water usage to better conserve and utilise water for gardens.</p>
02/18.1	Landlink Limited - Ben	Amendment 3 –	Not specified	Notes that use of the word 'site' is	Amend the word 'site' to allow for

Sub. No.	Submitter Name	Issue/Provision	Support/In-part/Oppose	Summary of Submission	Decision Sought
	Addington	Definition of integrated residential development		<p>too restrictive and that the requirement to design a development to function and be managed in a specific way provides no certainty to an applicant about what is required.</p> <p>Queries why a mix of housing types is required, and considers the requirement for a development to be constructed in one or more stages is superfluous because this approach is obvious.</p>	more than 1 site to comprise the 2,000m ² .
02/18.2	Landlink Limited - Ben Addington	Amendment 1 – Policy 6.3.6	Not specified	Notes that the removal of this policy seems unnecessary, and suggests a substantial rewording should be considered instead.	Retain and amend the wording of Policy 6.3.6.
02/18.3	Landlink Limited - Ben Addington	Amendment 3 – Policy 6.3.10A	Not specified	<p>Queries what “function in a coherent and integrated way” means, noting that the terms ‘coherent’ and ‘integrated’ are contradictory and that ‘integrated’ appears to be a more logical choice.</p> <p>Suggests that the reference to scale and character should be removed as there is no mention of these in the RMA and they will result in NIMBY arguments against integrated residential development. Also suggests that environmental amenities should be replaced with the more commonly understood term “amenity values”.</p>	<p>Amend Policy 6.3.10A as follows:</p> <p>Provide for integrated residential development where the design ensures that the site and built form function in an <u>coherent and integrated way</u>, and that the development complements the scale and character of the local area and does not significantly adversely affect local environmental amenities <u>amenity values</u>.</p>

Sub. No.	Submitter Name	Issue/Provision	Support/In-part/Oppose	Summary of Submission	Decision Sought
02/18.4	Landlink Limited - Ben Addington	Amendment 1 – Rule 15.3 Restricted Discretionary Activities	Not specified	Notes there are no changes to Chapter 25 to assist with the assessment of infill subdivision and integrated residential development applications, and that this should be considered.	Requests consideration of amendments to Chapter 25 – Assessment Criteria to assist with assessment of infill subdivision and integrated residential development applications.
02/18.5	Landlink Limited - Ben Addington	Amendment 2 – Rule 15.6.1 Number of Residential Dwelling Units and Family Flats	In-part	Supports the increase in the number of residential dwellings permitted on a property, but considers that the concept of a notional net site area is ill-conceived as such a standard imposes a default fee simple subdivision and will fail to deliver a greater volume or diversity of housing.	Remove reference to notional net site area in Rule 15.6.1(a).
02/18.6	Landlink Limited - Ben Addington	Amendment 1 – Rule 15.6.6 Private Outdoor Living Area	Not specified	Notes that 20m ² with a 2.5m circle is an arbitrary outdoor living area, and will result in the smallest of spaces being squeezed in around the largest possible dwelling. Suggests consideration of a ratio to bedrooms or building floor area to encourage spaces that are fit for purpose.	Requests consideration of a ratio to bedrooms or building floor area to determine outdoor living area instead of 20m ² with a 2.5m circle.
02/18.7	Landlink Limited - Ben Addington	Amendment 4 – Rule 15.6.8 Accessory Buildings	Not specified	Notes that it should be clear what is expected to be constructed when it comes to accessory buildings. A double garage seems like a reasonable permitted standard.	Amend Rule 15.6.8 to reflect the size of accessory building that is anticipated to be constructed (i.e. a double garage).
02/18.8	Landlink Limited - Ben Addington	Amendment 1 – Rule 15.8.15	Not specified	Notes that the list of restricted discretion is too long and generates	Amend 15.8.15 as follows: <ul style="list-style-type: none"> • Replace references to

Sub. No.	Submitter Name	Issue/Provision	Support/In-part/Oppose	Summary of Submission	Decision Sought
		Matters of Discretion for Infill Subdivision		<p>too much uncertainty, and that some matters of discretion are duplicated with the RMA and NES's (i.e. (iii), (iv), (vi), (vii), (ix), (x) and (xv)).</p> <p>Suggests that references to 'character' should be changed to 'amenity values', that Chapter 24 – Subdivision and Development should be a matter of discretion and that provision should be made for non-notification of infill subdivision.</p> <p>Also notes that a lot area approach assumes a fee simple pattern of development, and suggests that a better approach would be to identify the built form outcomes sought and allow boundaries to come naturally from design led development proposals.</p>	<p>'character' with 'amenity values'.</p> <ul style="list-style-type: none"> • Make Chapter 24 – Subdivision and Development a matter of discretion. • Include provision for infill subdivision to be treated on a non-notified basis. • Remove Matters of Discretion (iii), (iv), (vi), (vii), (ix), (x) and (xv). <p>Requests consideration of an alternative approach to that proposed which is based on the built form development outcomes sought.</p>
02/19.1	Pirie Consultants Limited - Philip Pirie	Whole plan change	Support	Supports the plan change as it provides flexibility for continued development in the Residential Zone. Notes that the ability to develop sections of a small size within the controls will better utilise land without the need to expand the zone, and that the integrated development proposal enables a more appropriate range of development; especially in areas zoned Low Density Residential.	Retain Plan Change 2 as proposed.

Further Submissions must be received by Horowhenua District Council before 4:00pm Monday 19 February 2018.