

Chapter 7: Rural Environment

Section 42A Report Overview

1.0 Introduction

- 1.1 The section 42A report I have prepared considers submissions received on the provisions of Chapter 7: Rural Environment, related definitions, Chapter 7 appendices and the District Plan Maps.
- 1.2 There were 131 submissions and 123 further submissions received on Chapter 7 which sought a range of outcomes, including the deletion of all the provisions from the chapter. There were also a number of consequential changes arising from submissions on the whole PDP and on other chapters that I have considered and included in the amendments to the text of Chapter 7 in Section 4 of my report as best I can with the information available at the time of writing my report. I note that it is possible and likely that further amendments may yet be required as the hearing progresses.

2.0 Report Structure

- 2.1 The first two sections of the report provide an introduction, including an overview of the content and the key issues in contention, and the relevant statutory documents considered in my assessment of the submissions: namely the Operative Wellington Regional Policy Statement and the Proposed Natural Resource Plan for the Wellington Region.
- 2.2 Section 3 of the report identifies the matters raised in submissions, sets out my recommendations on whether to accept, accept in part or reject each submission point (and the related further submissions) and details my recommendations to amend the PDP as an outcome of my assessment.
- 2.3 For efficiency, the submissions and further submissions on Chapter 7 have been grouped using an issues and provisions-based approach in accordance with section 10(3) of Schedule 1 to the RMA, into the following 18 sub-topics:
 - Section 7 Rural Environment - comprising the introductory part of the chapter, including zone descriptions;
 - General Rural Zones Provisions;
 - Definitions;
 - General Subdivision;
 - Pastoral, Arable Farming, Plantation Forestry, Shelter belts, Outdoor Pig Farming, Horticulture, Viticulture and Orchards;
 - Intensive farming;
 - Kapiti and Outer Islands;
 - Rural-Residential Zone;
 - Rural Dunes Zone;

- Rural Plains Zone;
- Rural Hills Zone;
- Rural Eco-Hamlet Zones and the Ngarara Precinct;
- Paraparaumu North Rural Precinct;
- Peka-Peka North Rural-Residential Precinct;
- Future Urban Development Zone;
- District Plan Maps;
- Other General Submissions; and
- Extractive Industries.

2.4 Section 4 of my report includes a tracked changes version of Chapter 7 that shows my recommended amendments to the provisions, and recommended amendments to some of the definitions in Chapter 1 of the PDP.

2.5 Section 5 of the report contains a summary table of all the submissions considered in my report (including related further submissions), my recommendations in relation to each point, and reasons.

2.6 There are 23 appendices attached to the report, including notes of meetings held with submitters, a pre-hearing meeting report, benchmarking reports, section 8AA RMA agreements, recommended amendments to the Waikanae North Eco-Hamlet Zone Structure Plan Map and a Landscape Assessment Report prepared by Isthmus Group Ltd on the Waikanae North Rural Eco-Hamlet Zone.

3.0 Overview of Chapter 7

3.1 Chapter 7 includes policies and rules for subdivision, use and development in the following six zones and three precincts (which overly zones):

- Rural Residential Zone
- Rural Dunes Zone
- Rural Plains Zone
- Rural Hills Zone
- Rural Eco-Hamlet Zone
- Future Urban Development Zone
- Ngarara Precinct
- Paraparaumu North Rural Precinct; and
- Peka Peka North Rural-Residential Precinct.

3.2 Chapter 7 also includes policies and rules relating specifically to Kapiti Island and the outer islands.

3.3 The chapter primarily implements three Objectives: 2.6 Rural Productivity, 2.3 Development Management and 2.11 Character and Amenity. I have referred to these objectives in my assessment of the submissions, where relevant, but have also referred to other PDP objectives that may be relevant (e.g. Objective 2.16 Economic Vitality).

3.4 Chapter 7 includes the following 5 appendices:

- Appendix 7.1 – Peka Peka North Rural-Residential Development Area
- Appendix 7.2 – Ngarara Precinct Structure Plan
- Appendix 7.3 – Ngarara Precinct Management Principles
- Appendix 7.4 – Waikanae North Eco-Hamlet Zone Structure Plan
- Appendix 7.5 – Otaki North Eco-Hamlet Zone Structure Plan

4.0 Key Issues in Contention

4.1 I consider the following to be the key issues in contention in Chapter 7:

- Policies and rules for the planting and harvesting plantation forestry - particularly permitted activity rule standards for setbacks of planting from waterbodies, existing residential buildings and legal boundaries, and the activity status for planting and harvesting more than 10 hectares of plantation forestry in any one calendar year;
- Requirements within the policies and rules for the protection of, or avoidance of, adverse effects on features that are not required to be protected under section 6 of the RMA and the request for a more balanced approach;
- Permitted activity rule standards for buildings and development and restricted discretionary rule standards for subdivision in the Waikanae North Rural Eco-Hamlet Zone, particularly in relation to the minimum average lot size;
- Permitted activity rule standards for the width of farm tracks and for associated earthworks; and
- General subdivision rule standards, including the requirement for every new lot in all rural zones to have an encumbrance on the title prohibiting further subdivision.

5.0 Matters Resolved & Still to be Resolved

Section 8AA RMA Agreements

5.1 In my assessment of submissions I note the following two agreements with submitters under section 8AA of the RMA:

- Submission 372.17 Michael and Elizabeth Welch - it was agreed that Rule 7A.3.2.4 would be amended by adding a new standard to the rule, as follows:

“b) Notwithstanding a) above, where a site contains land in the Rural Hills Zone and the Paraparaumu North Rural Precinct subdivision shall create lots with a minimum average of 3.5ha per lot across the subdivision and a minimum individual lot area of 1ha.”

- Submission 8.5(5) Aaron & Michael Jack – it was agreed:

“That the recommendations by Isthmus in their report referred to in Section 1.2 above be adopted such that the Structure Plan Map in Appendix 7.4 is amended as follows:

- *The boundaries of the ‘Visually Sensitive Area’ and ‘Visually Sensitive Ridgeline’ on the Submitter’s property are changed in accordance with Figure 15 of the Isthmus report (attached as Attachment 4 to this report).”*

Submitter 451 FS29) Rob Crozier and Joan Allin

5.2 Submitter 451 Rob Crozier and Joan Allin presented evidence and submissions to the General/Plan-Wide hearing which is relevant to the whole of the PDP and the submitter specifically requested that it be considered for each hearing.

5.3 I note that the submitter reiterates concerns relating to the whole of the PDP, including poor draft, lack of attention to detail, defined terms and use of italics, use of clear and consistent language, use of appropriate default rules and legally valid provisions. In response to the submission I have recommended a number of amendments, including:

- Renaming Chapter 7 from “Rural Environment” to “Rural Zones”
- Multiple amendments to policies and rules to clarify and achieve better consistency; and
- Amending default permitted activity Rule 7A.1.1.

5.4 I refer to amendments made in response to Submitter 451 in a number of places in my s42A report and against amendments made to the PDP text in section 4 of my report.

5.5 Submitter 451 has also raised concerns about the use of terms in the PDP, such as ‘site’, ‘lot’, ‘property’. I have endeavoured to amend key terms as much as possible as part of my recommendations, however, I am aware that further amendments are likely to be required and consider that these can be addressed as part of the comprehensive tidy-up of defined terms intended to occur towards the end of the hearings.

Submitter 457 NZ Transport Agency

5.6 Submitter 457 NZ Transport Agency advises that the approach outlined in Policy 7.10 – Growth Management (as I have recommended that it be amended) is entirely appropriate as it allows for the integration of transport and land use activities.

5.7 The Submitter notes that the summary of submissions incorrectly allocated the Submitter’s submission (457.29) on Policy 7.17 – Rural Eco-Hamlet Zone against Policy 7.12 Household Units. I identified this error in my report, but then omitted considering the submission point in relation to Policy 7.17.

5.8 The relief sought by the submitter relates to a request to amend clause j) of Policy 7.17, to require the structure plan to retain a 40 metre no-build buffer and noise attenuation for 40-100 metres from the road edge, and to include new performance criteria to capture all noise activities. The Submitter advises in their evidence that they now consider that the relief sought will be more appropriately captured in Chapter 12

of the PDP. As such, NZ Transport Agency formally withdraws its submission (457.29) on Policy 7.17.

- 5.9 Submission 457.64 NZ Transport Agency requests that the structure plan for the Waikanae North Eco Hamlet Zone in Appendix 7.4 of the PDP be amended to provide for a 40 metre 'no build buffer either side of the Expressway with a noise insulation standard applying within a noise attenuation buffer of 40 to 100 metres from the road edge. However, the Submitter advises that upon review of their submission they consider that the relief will be more appropriately captured in Chapter 12 of the PDP and they withdraw Submission 457.64.
- 5.10 Similarly, the NZ Transport Agency advises that they withdraw Submissions 457.30 and 457.31 on Policy 7.19 – Future Development Zone as the relief sought can be appropriately captured in Chapter 12 of the PDP. The Submitter also considers that my recommendations in response to their request to relocate the definition of structure plan and include reference to roads (in paragraph 12039 of my report) is appropriate.

Submitter 447 KiwiRail Holdings Limited

- 5.11 KiwiRail request in their submission (447.9) that Policy 7.19 – Future Urban Development Zone be amended to have regard to reverse sensitivity effects relating to current and future transport corridors. KiwiRail also request (Submission 447.10) that the Explanation to Policy 7.19 be amended by adding a new paragraph about urban development potentially adversely affecting existing activities (including reverse sensitivity effects) and designated infrastructure corridors.
- 5.12 I have recommended in my report that the submissions be rejected on the basis that there is a General/Whole of Plan recommendation to delete explanations to policies in the whole PDP, and that it is not necessary to amend Policy 7.19 as I understand that the Chapter Lead for Chapter 1 will be recommending that a new Section 1.3A Structure Plans be included in Chapter 1 (as per the Submitter Engagement Version of the PDP), which will include a requirement for structure plans to include the following feature:

“protection, safety and access requirements of existing Network Utility Infrastructure, including consideration of potential reverse sensitivity effects.”

- 5.13 KiwiRail advises that they accept the recommendation in the General/Whole-of-Plan s42A report to delete explanations to the policies in the PDP and they also consider that the inclusion of the feature in new Section 1.3A will appropriately address Submission 447.9. However, the Submitter considers that the nature of reverse sensitivity effects should be included to illustrate issues of concern, as follows:

*“protection, safety and access requirements of existing Network Utility Infrastructure, including consideration of potential reverse sensitivity effects **such as glare, dust, stormwater, building up to boundaries, vegetation access, amenity.**”*

- 5.14 My preliminary thoughts are that the amendment sought by the Submitter is unnecessary. However, the Reporting Officer for Chapter 1 will also need the opportunity consider whether the amendment is appropriate. As such, I am not yet in a position to provide a response on this matter.

Submitter 441 Greater Wellington Regional Council

- 5.15 The evidence provided by Greater Wellington Regional Council advises that the Submitter supports the recommendations in my report relating to Greater Wellington Regional Council's submissions on Chapter 7.

Submitter 404 (FS174) New Zealand Fire Service Commission

- 5.16 The New Zealand Fire Service request (Submission 404.1) that Rule 7A.3.2.1(h) be amended so that the firefighting requirements are 20,000L (not 45,000L) where houses are not in close proximity to each other. The submitter also requests the addition of an advice note to contact the NZ Fire Service when installing a fire fighting water supply in order to ensure that the most appropriate form of compliance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509 is adopted.
- 5.17 In the Submitter Engagement Version of the PDP I suggested deleting clauses h) – k) of Standard 1 of Rule 7A.3.2 and replacing them with a matter of discretion relating to the provision of an adequate water supply for fire-fighting purposes. I have carried this amendment over into my recommended amendments to Rule 7A.3.2 in my section 42A report on the basis that it is not appropriate to refer to a standard that is outside the PDP.
- 5.18 Mr Hughes from the New Zealand Fire Service has provided evidence outlining the importance of ensuring adequate firefighting water supplies are available and appropriate access for fire fighting vehicles is provided to properties and water sources in rural areas to protect life and property. Mr Hughes refers to the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 and the considers that recognition of the Code of Practice in district plans and conditions on resource consents is important to ensure that sufficient water resources and vehicular access are available.
- 5.19 The planning evidence provided by consultant Planner Ainsley McLeod, for the New Zealand Fire Service, refers to section 75(5) of the RMA which expressly provides for the incorporation of material by reference to Part 3 of the First Schedule to the RMA, and advises that Clause 30 of the First Schedule allows for the incorporation of certain documents by reference in a plan. The Planner considers that Clause 30 enables the inclusion of the Code of Practice as a Standard in Rule 7A.3.2 given its status as a New Zealand Standard. The Planner also considers that the inclusion of a standard in Rule 7A.3.2 is preferable to a matter of discretion under section 104C because:
- New Zealand Standards are accorded respect;
 - A matter of discretion relies on the distraction of Council officers and decision makers to evaluate the extent of fire hazard or potential adverse effects; and
 - The Code of Practice is dissimilar to the majority of 'matters over which Council will restrict its discretion' that either require evaluation or are directly relevant to Council interests, such as roads and infrastructure.
- 5.20 However, the Planner acknowledges that the prescriptive nature of the standards in clauses h) –k) may have given rise to the concerns expressed and advises that the

more recent, consistent approach the Commission seeks is that the Code of Practice be referenced in whole in District Plans. The Planner advises that this approach is consistent with recent decisions on the Christchurch Replacement Plan. As such, the Planner supports deleting clauses i) – k) of Standard 1, amending clause h), and adding a new advice note as follows:

“h) A fire fighting water supply shall be provided which complies with the New Zealand Fire Service Fire Fighting Water Supplies Code of Practice SNZ PAS 4509:2008, including one of the following:

Advice Note: Applicants may consult with the New Zealand Fire Service in order to determine a specific method to comply with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.”

- 5.21 I agree with the submitter that ensuring adequate firefighting water supplies and access for fire fighting vehicles to properties and water sources in rural areas is important. I also acknowledge the reasons given by the Submitter’s Planner as to why a standard is preferable to a matter of discretion in Rule 7A.3.2. On that basis, I consider that Standard 1 of the rule should be amended as recommended by the Planner, and as set out above.
- 5.22 The Submitter’s Planner also notes that I did not include Submission 404.2 in my assessment of submissions on Rule 7A.1.4. That is correct and I can confirm that it was omitted in error. However, because of the omission I have not assessed the Commission’s request to amend Standard 2 of the rule to require all habitable buildings to have an access way designed and built for the entry and exit of fire fighting vehicles with a minimum width of 4 metres and a minimum 4 metre unobstructed height (i.e. clear from vegetation, buildings and structures).
- 5.23 Mr Hughes confirms in his evidence that the minimum width requirement at an entrance is 3.5 metres and the minimum height is 4 metres, which reflects the most recent minimum standard included in the Emergency Vehicle Access Guidelines published in 2015. The Planner advises that she supports amending the Standard to reflect this amendment.
- 5.24 As the standard relates solely to meeting requirements for the entry and exit of fire fighting vehicles I consider that it is important that the standard reflects the Emergency Vehicle Access Guidelines. I note that there are other submissions or further submissions relating to clauses a) and b) of Standard 2. On that basis I wish to amend my recommendation so that Standard 2 of Rule 7A.1.4 is amended as follows:

- “2. All habitable buildings shall have a formed vehicle access designed and built for the entry and exit of fire fighting vehicles and shall meet the following minimum requirements:*
- a) ~~2.5~~ 3.5 metres in width; and*
 - b) ~~2.8~~ 4 metres in unobstructed height (i.e. clear from vegetation, buildings and structures).”*

Submitter 263 (FS125) Maypole Environmental Limited

- 5.25 The consultant Planner for Maypole Environmental Ltd, Mr Hansen, states in his evidence a number of times that the Submitter's request is for the rules of the PDP to be consistent with those in Plan Change 80 to the Operative District Plan. Mr Hansen provides an assessment of the key differences between the PDP and Operative District Plan provisions for the Ngarara Precinct.
- 5.26 However, I consider that Mr Hansen holds a different view to me about how the rules work under each plan.
- 5.27 The relevant rules for the Ngarara Precinct in the PDP are set out in Chapter 7: Rural Environment. Under Rule 7A.3.6, restricted discretionary resource consent is required for all buildings and activities in the Kukutauaki and Kawakahia Eco-Hamlets of the Ngarara Precinct subject to compliance with standards under the rule. Where one or more standards are not complied with, a non-complying resource consent is required under Rule 7A.5.1 of the PDP. Under the equivalent rule in the Operative District Plan (i.e. Rule D.2.1.3(B)(xvii), a discretionary resource consent is required, subject to compliance with discretionary standards under D.2.2.3(B)(vi). If the standards are not complied with, a non-complying resource consent is needed under default non-complying activity Rule D.2.1.4(i). I note that the discretionary activity standards in the Operative District Plan have been carried over into PDP Rule 7A.3.6, although the PDP rule includes matters over which the Council will restrict its discretion (including effects on wetland habitat and indigenous flora and fauna).
- 5.28 Rule 7A.3.7 of the PDP requires restricted discretionary resource consent for subdivision anywhere in the Ngarara Precinct, subject to compliance with standards under the rule. A non-complying resource consent is required under Rule 7A.5.4 if the subdivision does not comply with one or more of the standards. The equivalent rule in the Operative District Plan is discretionary Rule D.2.2.3(B)(vi). A non-complying resource consent is required under default non-complying activity Rule D.2.1.4(i) if the standards under Rule D.2.2.3(B)(vi) are not complied with. I note that the subdivision standards in the Operative District Plan have been carried over into Rule 7A.3.7 of the PDP, although Rule 7A.3.7 includes matters over which the Council will restrict its discretion, including the location of any associated building sites relative to natural hazards, historic heritage features and sensitive natural features.
- 5.29 The subdivision standards in Rule D.2.2.3(B)(vi) of the Operative District Plan include a requirement to comply with General Standards D.2.2.2. General Standard D.2.2.2 f) (page D2-36) relates to the protection of Heritage Features, including ecological, historic and geological sites, significant trees and waahi tapu listed in the Heritage Register, as follows:

- (f) Protection of Heritage Features
- All historic, ecological and geological sites, significant trees and waahi tapu listed in the Heritage Register in Part I of this Plan shall be protected from adverse effects as a result of subdivision. Protection of features in the Heritage Register by fencing (such as a 7 wire post and wire fence or equivalent) shall be considered as one means of meeting this standard. Where a lot containing a heritage feature is to be subdivided, and fencing of the feature is not proposed, applicants shall have to demonstrate that this is because fencing is not a practical or appropriate means of protecting the feature.
 - Council will issue a consent notice under Section 221 of the Resource Management Act 1991 or require a conservation covenant to ensure the protection of these sites.
 - In so far as any fencing or works or other financial contributions are required, the owner shall carry out or meet the full costs of such works, the purpose of which is the protection of landscapes, ecological features and cultural sites from inappropriate development on a continuing basis (refer to Part E of this Plan).

5.30 Therefore, it is very clear from the standard above, that there is a requirement for subdivision within the Ngarara Precinct to protect any ecological, historic and geological sites, significant trees and waahi tapu listed in the Heritage Register.

5.31 Under the Operative District Plan buildings and development outside the Kukutauaki and Kawakahia Eco-Hamlets are subject to the rules of the underlying Rural Zone. In the PDP, buildings and development located outside the Kukutauaki and Kawakahia Eco-Hamlets in the Ngarara Precinct are subject to the permitted activity rules for the underlying Waikanae North Rural Eco-Hamlet Zone, including the need for development to be consistent with the Structure Plan for the Ngarara Precinct. Restricted discretionary resource consent is required under default Rule 7A.3.1 if one standard is not complied with, otherwise non-complying resource consent is required under Rule 7A.5.1 if two or more standards are not complied with.

5.32 Mr Hansen states (paragraph 63) that he considers it is not acceptable or appropriate for subdivision, development and activities in the Ngarara Precinct to be subject to the provisions of other Chapters. His primary reason for considering this is that Plan Change 80 has been through a comprehensive and robust planning process and the stand-alone provisions of the Ngarara Precinct incorporated into the Operative District Plan should not be subject to other provisions of the PDP.

5.33 I consider that Mr Hansen's assessment of the Operative District Plan provisions is somewhat simplistic and overlooks the requirement in that Plan for discretionary resource consent to subdivide and develop land within the Ngarara Precinct. The Council has full discretion in assessing such applications, and one of the discretionary subdivision standards requires the protection of waahi tapu sites, ecological sites, geological sites or heritage sites listed in the Heritage Register. In my opinion, that is not dissimilar to the protection of such sites required under the rules in Chapter 3: Natural Environment and Chapter 10: Historic Heritage in the PDP.

- 5.34 One new aspect of the PDP (compared to the Operative District Plan) is the Ngarara Dunes outstanding natural Feature and landscape area that overlies the Ngarara Precinct. I note that I will be recommending in my section 42A report on Chapter 3 that the classification of that landscape area be changed to a Special Amenity Landscape area, based on advice from Isthmus Group Ltd, who have reviewed the landscape values of area in response to submissions on the PDP. I will also be recommending in my Chapter 3 report that all rules relating to Special Amenity Landscapes be deleted, but that Policy 3.19 on Special Amenity Landscapes be retained as well as Schedule 3.5 and the identification of the landscapes on the PDP Maps.
- 5.35 I note that Mr Hansen considers (in paragraph 45 (a)(ii)) that apart from Permitted Activity Rule 7A.1.10 Standard 3 (a) – (f), all of the other permitted activity standards are new (i.e. not carried over from the Operative District Plan). That is correct, but it is important to note that the reason for that is that there are no equivalent standards in the Operative District Plan because Plan Change 80 only added Policies 6(b) and 6(c). The development of the Waikanae North Rural Eco-Hamlet Zone Structure Plan and rules for the Rural Eco-Hamlet Zone have only been developed as part the PDP process.
- 5.36 I concur with Mr Hansen that the amendment to the wording in Rule 7A.0 that I have recommended is not appropriate. However, having considered the matter further I am currently of the opinion that it is not appropriate to exempt the Ngarara Precinct from having to comply with any other rules or standards in other chapters of the PDP. In my opinion, the policy and rule framework for the Ngarara Precinct in the PDP is not that dissimilar to the Operative District Plan. In fact, if the provisions were to be made more similar to the Operative District Plan provisions, then the status of building, development and subdivision in the Ngarara Precinct would need to be changed from restricted discretionary to discretionary. I am aware that Maypole Environmental Ltd has made similar submissions on other chapters of the PDP, and I am not yet certain what the recommendations of the other Reporting Officers will be. For that reason, while I consider that my current recommendation is not appropriate, I wish to give the matter further consideration.
- 5.37 Mr Hansen has a number of concerns with Rule 7A.1.10 and is uncertain about the intent of the rule. Rule 7A.1.10 applies to buildings and activities within the Ngarara Precinct that are not within the Kukutuaki and Kawakahia Eco-Hamlets (i.e. the underlying Rural Eco-Hamlet Zone provisions apply). This is the equivalent situation to the Operative District Plan where the underlying Rural Zone provisions apply. Rule 7A.3.6 only applies to buildings and activities in the Kukutuaki and Kawakahia Eco-Hamlets.
- 5.38 I note that Mr Hansen supports the restricted discretionary status of activities and considers that the standards have been carried over accurately from the Operative District Plan discretionary activity standards.
- 5.39 Mr Hansen questions (paragraph 77) the appropriateness of the matters of discretion in Rule 7A.3.7 and considers that they have already been addressed as part of the extensive Plan Change 80 process. In his opinion, compliance with the approved structure plan in Appendix 7.2 and the Management Principles in Appendix 7.3 of the PDP is the matter of discretion.

5.40 I note that the Operative District Plan does not restrict its discretion to compliance with the Structure Plan and Management Principles. Rather, if the subdivision is not in accordance with the Structure Plan and Management Principles, the status of the subdivision changes from discretionary to non-complying. In the PDP, Standard 1 of Rule 7A.3.7 requires development to be carried out in accordance with the Structure Plan and Management Principles for the Ngarara Precinct in Appendix 7.2 and Appendix 7.3. Non-compliance with this standard triggers the need for non-complying resource consent under Rule 7A.5.4 of the PDP. With respect to the matters of discretion under Rule 7A.3.7, I consider that they provide more certainty for the applicant than the current full discretion available to the Council when considering applications under the operative District Plan rule. I therefore do not support Mr Hansen's opinion.

5.41 I note that Mr Hansen considers non-complying activity status is too onerous and unnecessary. As I have mentioned, the current default status under the Operative District Plan is also non-complying. In that regard, I consider that the PDP is consistent with the Operative District Plan, which is consistent with Plan Change 80.

Other Evidence

5.42 Evidence has also been received from the following submitters.

- Land Matters Ltd (on behalf of Submissions 319 (FS177) Waikanae Christian Holiday Park Inc, 372 (FS58) Michael and Elizabeth Welch, 380 (FS59) Barry, Suzanne and Timothy Mansell, 408 (FS102) USNZ Forestry Group Ltd, 411 (FS178) Land Matters Ltd, 425 (FS180) Lutz Brothers Ltd, 487 (FS181) Bellcamp Trust Company Ltd, 495 (FS186) Mahaki Holdings Ltd, 492 (FS183) Kennott Trust Company Ltd and Kauri Trust, 320 (FS43) Carter Family of Reikorangi) - received on 20 May 2016
- Egon Guttke (Submitter 100 and FS9) – received on 26 May 2016
- Federated Farmers of New Zealand (Submitter 260 and FS93) – received on 27 May 2016
- Wellington Branch NZ Farm Forestry Association (Submitter 188) – received on 30 May 2016
- Lyndon Enterprises Ltd (Submitter 271) – received 7 June 2016.

5.43 As the above evidence was received after the deadline of 16 May 2016, I have not had the opportunity to review it and prepare a response in advance of the hearing.

Janeen Kydd-Smith

13 June 2016