

# Further submission in support of, or in opposition to, submission on notified proposed plan change



## About preparing a further submission on a proposed plan change

### You must use the prescribed form

- [Clause 8](#), Schedule 1 of the Resource Management Act 1991 (RMA) requires further submissions to be on the prescribed form.
- The prescribed form is set out in [Form 6](#), Schedule 1 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.
- This template is based on Form 6. While you do not have to use this template, your submission must be in accordance with Form 6.

### Certain persons may make further submissions

- Under clause 8, Schedule 1 of the RMA the following persons may make a further submission, in the prescribed form, on a proposed plan to the relevant local authority:
  - any person representing a relevant aspect of the public interest
  - any person that has an interest in the proposed policy statement or plan greater than the interest that the general public has
  - the local authority itself.
- You will need to explain why you meet one of these categories (space is provided in the form for this below).

### Your further submission and contact details will be made publicly available

- [Section 352](#) of the RMA allows you to choose your email to be your address for service. If you select this option, you can also request your postal address be withheld from being publicly available. To choose this option please tick the relevant boxes below.

### Note to person making the submission

- A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority (Kāpiti Coast District Council).

### Reasons why a further submission may be struck out

Please note that your further submission (or part of your further submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the further submission (or part of the further submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

## To Kāpiti Coast District Council

Further Submission in Support of (or Opposition to) a Submission on Proposed Plan Change to the Operative Kapiti Coast District Plan 2021

**Plan Change Number:** Plan Change 2

**Plan Change Name:** Intensification

### **Further submitter details**

<b>Full name of person making further submission:</b> Landlink Ltd	
<b>Contact person (name and designation, if applicable):</b> Marie Payne/Paul Turner Landlink	
<b>Postal address (or alternative method of service under section 352 of the RMA):</b> marie@landlink.co.nz / Paul@landlink.co.nz	
<b>Telephone:</b> 04 902 6161	
<b>Electronic address for service of person making further submission (i.e. email):</b> marie@landlink.co.nz / Paul@landlink.co.nz	
<b>I would like my address for service to be my email</b> <i>[select box if applicable]</i>	<input checked="" type="checkbox"/>
<b>I have selected email as my address for service, and I would also like my postal address withheld from being publicly available</b> <i>[select box if applicable]</i>	<input type="checkbox"/>

### **State whether you are** *[select appropriate box]*

a person representing a relevant aspect of the public interest.	<input checked="" type="checkbox"/>
<i>In this case, also please specify the grounds for saying that you come within this category</i> <ul style="list-style-type: none"><li>- Land development/planning professionals with an interest in promoting sustainable development for the community</li><li>- Contributing to the development of practical and sustainable provisions within the District Plan</li><li>- Ensuring the needs of our community are reasonably met and that adequate effect is provided to the implementation of the NPS-UD</li></ul>	
a person who has an interest in the proposal that is greater than the interest the general public has.	<input type="checkbox"/>
<i>In this case, also please explain the grounds for saying that you come within this category</i>	
the local authority for the relevant area.	<input type="checkbox"/>

### **Scope of further submission**

<b>I support</b> <input checked="" type="checkbox"/> <b>oppose</b> <input type="checkbox"/> <b>the submission of:</b> <i>[select the appropriate wording]</i>
<b>Original Submitter's Name and Address for Service:</b> Leith Consulting Ltd
<b>Submission number of original submission:</b> S202

**Particular parts of the submission I support (or oppose) are:**

*Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. While it is not a requirement, it would be helpful if you could state the submission point number as listed in the summary of decisions requested document.*

S202.02  
S202.04  
S202.05  
S202.07  
S202.10  
S202.11  
S202.14  
S202.15

*Continue on a separate sheet if necessary*

**The reasons for my support (or opposition) are:**

[give reasons]

Please see Attachment (a)

*Continue on a separate sheet if necessary*

**I seek that** [select appropriate box]

The whole ☐ or part ☒ of the original submission be allowed ☒ disallowed ☐

[describe precisely which part below]

As per Attachment (a)

*Continue on a separate sheet if necessary*

**Hearing Submissions** [select appropriate box]

I wish to be heard in support of my further submission. ☐

I do not wish to be heard in support of my further submission. ☒

*If you wish to be heard, please tick one of the following*

If others make a similar submission, I will consider presenting a joint case with them at a hearing. ☐

If others make a similar submission, I will not consider presenting a joint case with them at a hearing. ☐

**MPayne 24/11/2022**

Signature of person making a further submission  
(or person authorised to sign on behalf  
of person making further submission)

Date

*A signature is not required if you make your submission by electronic means.*

Email your further submission to [district.planning@kapiticoast.govt.nz](mailto:district.planning@kapiticoast.govt.nz) or  
post/deliver to:

Attn: District Planning Team  
Kāpiti Coast District Council  
175 Rimu Road  
Paraparaumu 5032

For office use only

Further submission No:  
S206.FS.9

S202 Further Submission Landlink – Attachment (a)

I support or Oppose Submission	Particular parts of the submission I support (or oppose are)	The reasons for my support or opposition are:	I seek that:	Be:
Support	S202.02	Support - as per Landlink's initial submission we believe that further clarity is required around flood risk and MDRH.	Part of the submission	allowed
Support	S202.04	Support in part - the council should support subdivision of land in to smaller vacant allotments - without requiring detailed land use plans. This is because the potential uptake of MDRH will be broadened if people are able to create smaller vacant allotments. Providing landuse plans for developments which may not be realised is not an efficient use of resources. Additionally a non-complying status for subdivision for vacant lots not meeting a 450m2 / 15m diameter requirement is viewed as overly restrictive given the permitted baseline provided by MDRS. Suggest a new min lot size is determined through analysis of size of lots that MDRH can be reasonably facilitated on - retention of 450m2 - reflects older provisions of the District Plan which did not account for MDRH. We acknowledge this is a complex area and work maybe constrained given short timeframes but a well-considered new min lot size (if retention of a min lot size is considered appropriate) will likely lead to better urban design outcomes.	Part of the submission	allowed
Support	S202.05	Support in part - the council should support subdivision of land in to smaller vacant allotments - without requiring detailed land use plans. This is because the potential uptake of MDRH will be broadened if people are able to create smaller vacant allotments. Providing landuse plans for developments which may not be realised is not an efficient use of resources. Additionally a non-complying status for subdivision for vacant lots not meeting a 450m2 / 15m diameter requirement is viewed as overly restrictive given the permitted baseline provided by MDRS. Suggest a new min lot size is determined through analysis of size of lots that MDRH can be reasonably facilitated on - retention of 450m2 - just reflects older provisions of the District Plan which did not account for MDRH. We acknowledge this is a complex area and work maybe constrained given short timeframes but a well-considered new min lot size (if retention of a min lot size is considered appropriate) will likely lead to better urban design outcomes.	Part of the submission	allowed

S202 Further Submission Landlink – Attachment (a)

Support	S202.07	Support in part - note that the design guides focus may be considered narrow - i.e. terraced/town houses and apartments. Also agree that the design guide use intent appears to be for 'higher density' developments and this should be clarified.	Part of the submission	allowed
Support	S202.10	Support amendment to TR-3 (and any related subdivision rules if appropriate). In higher density urban environments where active sustainable transport modes are a focus vehicle access over land to every site should not be a requirement. The need to ensure access/appropriate measures for firefighting purposes is however acknowledged.	Part of the submission	allowed
Support	S202.11	Support - General advise (e.g. Gov source Quality Planning outlines that) ...the non-complying activity status is intended for situations where it is intended consents only be granted in exceptional circumstances. Given the residential zoning and the potential permitted baseline through land use retaining a non-complying activity status for subdivision which do not meet min 450m lot size or 15m diameter circle.	Part of the submission	allowed
Support	S202.14	Support as per Landlink's initial submission and the points made - effects already established	Part of the submission	allowed
Support	S202.15	Support in part - There may be some sites where ground conditions or topography would make it difficult (but not impossible) to install soakage or attenuation infrastructure. So providing a pathway / defining a way to offset these impacts seems sensible.	Part of the submission	allowed

**From:** [Marie Payne](#)  
**To:** [Mailbox - District Planning](#)  
**Cc:** [louise.w@leithconsulting.co.nz](mailto:louise.w@leithconsulting.co.nz)  
**Subject:** Landlink further submission on S202 Leith Consulting  
**Date:** Thursday, 24 November 2022 1:17:31 pm  
**Attachments:** [Landlink further submission on S202 Leith Consulting.pdf](#)  
[Attachment a - Landlink further submission on S202 Leith Consulting Landlink .pdf](#)

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Kia Ora.

Please find the attached further submission.

Kind regards,

Marie