

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 Kāpiti Coast District Plan 2021

Plan Change Number: Plan Change 2

Plan Change Name: Intensification

Further submitter details

Full name of person making further submission: Landlink Ltd
Contact person (name and designation, if applicable): Marie Payne/Paul Turner Landlink
Postal address (or alternative method of service under section 352 of the RMA): marie@landlink.co.nz / Paul@landlink.co.nz
Telephone: 04 902 6161
Electronic address for service of person making further submission (i.e. email): marie@landlink.co.nz / Paul@landlink.co.nz
I would like my address for service to be my email <i>[select box if applicable]</i> <input checked="" type="checkbox"/>
I have selected email as my address for service, and I would also like my postal address withheld from being publicly available <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">- Land development/planning professionals with an interest in promoting sustainable development for the community- Contributing to the development of practical and sustainable provisions within the District Plan- Ensuring the needs of our community are reasonably met and that adequate effect is provided to the implementation of the NPS-UD	
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

I support <input checked="" type="checkbox"/> oppose <input type="checkbox"/> the submission of: <i>[select the appropriate wording]</i>
Original Submitter's Name and Address for Service: Note partial opposition to point s028.36 Ben Addington - ben.addington@infill.nz
Submission number of original submission: S028

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.

Support S028.35
Oppose s028.36
Support s028.37
Support S028.39
Support s028.39
Support s028.44
Support s028.46
Support S028.50
Support S028.51
Support S028.52
Support s028.58
Support s028.59

Continue on a separate sheet if necessary

The reasons for my support (or opposition) are:

[give reasons]

Please see attached (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 attached.

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 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.4

Attachment (a) The reasons for my support (or opposition) are:

s028.35 Support – Support the rationale provided for this point

s028.36 Partially oppose - note that definitions of what 'existing water way' is important for clarity and 'contributing catchment area' although we support planting in principle believe the standard could be reworded suggestion e.g. "as appropriate to the surrounding context".

s028.37 Partially support- agree with comment on matters of control 3, however need to be more specific about what stormwater infrastructure is included (in addition to swales). Perhaps reference KCDC's LOW IMPACT URBAN DESIGN AND DEVELOPMENT (LIUDD) STORMWATER GUIDELINE (2012) is appropriate. This doc includes Detention tanks, soak pits, Swales, Filter strips, Rain gardens, Ponds, Wetlands, Treatment trenches/rock filters, permeable and porous pavement

S028.39 Partially support - support rationale - the effects of non- compliance with controlled infrastructure activity should not result in an application being subject to notification.

s028.39 Support - support rationale rules as proposed may result in an unnecessarily restrictive activity status. 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. As per elsewhere in Landlink submission minimum/prescriptive requirements may also stifle innovation and the utilisation of new technology which provide other viable solutions.

s028.44 Support as per Landlink submission and rationale provided in Infill submission.

s028.46 Support as per Landlink submission and rationale provided in Infill submission (i.e. potential retrospective management of effects, additionally rigid transport requirements do not allow flexibility which could support more sustainable modes of transport in particularly in higher density areas

- S028.50 Support in part - do not believe min lot size requirements for vacant lots will support/enhance the provision of infill development and that activity status given the permitted baseline around land use is overly restrictive - 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.
- S028.51 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 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 is overly restrictive and not conducive to implementation of the NPS-UD. 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.
- S028.52 Support in part - do not believe that min lot size requirements and diameter circles (particularly that they remain the same as they were pre-MDRH) remain an appropriate tool to manage (assumed amenity effects) of development. If any min lot sizes are retained they should be based on detailed analysis of what the min viable development is in accordance with MDHR standards for consistency. The concept of a circle also does perhaps not seem an appropriate tool given that creative design may be integral to utilising sites which are not standard shape i.e. with the potential for positive design outcomes to be achieved.
- s028.58 Support - Landlink supports that residual flood hazards should not be a qualifying matter which inhibits MDRH if a proposal is able to comply with the relevant natural hazards rules e.g. NH-FLOOD rules
- s028.59 Support in part - We support greater flexibility to enable innovative design solutions which promote greater housing type and choice.

From: [Marie Payne](#)
To: [Mailbox - District Planning](#)
Cc: [Ben Addington](#); [Paul Turner](#); [Angela Kelly](#)
Subject: Landlink Further Submission Plan Change 2 - S029
Date: Thursday, 24 November 2022 12:28:12 pm
Attachments: [image002.png](#)
[image004.png](#)
[S028 Infill Further submission form-6 Landlink .pdf](#)
[Attachment \(a\) Infill S028 - Landlink Further Sub.pdf](#)



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