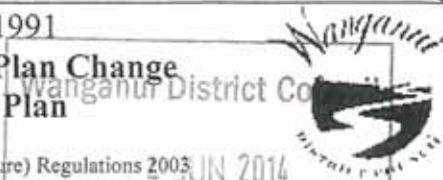




Resource Management Act 1991
Submission on a Publicly Notified Plan Change
To The Wanganui District Plan

In accordance with Form 5 - RM (Forms, Fees and Procedure) Regulations 2003



TO: Wanganui District Council, PO Box 637, Wanganui

Name: (print in full) PAUL + TRISH WEBSTER

RECEIVED

This is a submission on Plan Change No. 36 to the Wanganui District Plan. Closing Date: 4th June 2014

- 1. (a) I could/could not* gain an advantage in trade competition through this submission. (*please delete one).
- (b) I am/am not* directly affected by an effect of the subject matter of the submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition (*please delete one).

2. The specific provisions of the proposed plan change that my submission relates to:

165 MOSSON ROAD

Use additional pages if required

3. My submission is that (Please state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made. Please give your reasons):

WE OPPOSE THE LAND AT 12 CLARKSON AVE TO BE CHANGED FROM RURAL TO A RURAL 'C' ZONE.

Use additional pages if required

4. I seek the following decision from the Council (Give clear details stating what amendments you wish to see made to the Plan Change, and your reasons):

THE NEW 'SPRINGVALE INDICATIVE PLAN STRUCTURE' WE WOULD LIKE TO BE ZONED IN THE RURAL 'B' ZONE

Use additional pages if required

5. ~~I do~~/do not* wish to be heard in support of this submission (*please delete one).

6. If others make a similar submission I would/would not* be prepared to consider presenting a joint case with them at any hearing (*please delete one).

7. Address for service:

165 MOSSON ROAD

Signature: [Handwritten Signature]

(Person making submission or person authorised to sign on

Day time phone No: 02111 501441

behalf of person making submission)

Email: Date: 3.6.18

SCANNED



Resource Management Act 1991
Submission on a Publicly Notified Plan Change
To The Wanganui District Plan



In accordance with Form 5 - RM (Forms, Fees and Procedure) Regulations 2003

Wanganui District Council
- 4 JUN 2014
RECEIVED

TO: Wanganui District Council, PO Box 637, Wanganui

Name: (print in full) Tony & Carrie Eades

This is a submission on Plan Change No. 36 to the Wanganui District Plan. Closing Date: 04/06/14

(a) ~~Would~~/could not* gain an advantage in trade competition through this submission. (*please delete one).
(b) I am/~~am not~~* directly affected by an effect of the subject matter of the submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition (*please delete one).

2. The specific provisions of the proposed plan change that my submission relates to:
May develop our property in the future into two titles.
Use additional pages if required

3. My submission is that (Please state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made. Please give your reasons):
We oppose because of future subdivision of our property.
Use additional pages if required

4. I seek the following decision from the Council (Give clear details stating what amendments you wish to see made to the Plan Change, and your reasons):
We own 11 acres of Hill Country & may wish to develop a building site in the future as our land is not suitable for agricultural development.
Use additional pages if required

5. I do/do not* wish to be heard in support of this submission (*please delete one).

6. If others make a similar submission ~~would~~/would not* be prepared to consider presenting a joint case with them at any hearing (*please delete one).

7. Address for service:
654 Great North Road
Kai-Iwi
Wanganui
Signature: C.A. Eades
(Person making submission or person authorised to sign on behalf of person making submission)
Day time phone No: 06-34-89488
Email: carrieangel@xtra.co.nz Date: 1-6-2014



Resource Management Act 1991
Submission on a Publicly Notified Plan Change
To The Wanganui District Plan



In accordance with Form 5 - RM (Forms, Fees and Procedure) Regulations 2003

TO: Wanganui District Council, PO Box 637, Wanganui

Name: (print in full) DEREK ALEXANDER PIEST

This is a submission on Plan Change No. 36 to the Wanganui District Plan. Closing Date: 04/06/14

(a) I could/~~could not~~ gain an advantage in trade competition through this submission. (*please delete one).
(b) I ~~am~~/am not* directly affected by an effect of the subject matter of the submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition (*please delete one).

2. The specific provisions of the proposed plan change that my submission relates to:
option 3 - minimum lot size for rural zone A. of 10ha.
Use additional pages if required

3. My submission is that (Please state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made. Please give your reasons):
For land areas already below 10ha - that they can be subdividable. We purchased this property with the potential to subdivide for financial reasons. This is our only investment.
Use additional pages if required

4. I seek the following decision from the Council (Give clear details stating what amendments you wish to see made to the Plan Change, and your reasons):
That for land areas already below 10ha., the status one as per option 1 be retained. Area below 10ha are deemed to be non productive. 3(a).
Use additional pages if required

5. I do/~~do not~~* wish to be heard in support of this submission (*please delete one).

6. If others make a similar submission I would/~~would not~~* be prepared to consider presenting a joint case with them at any hearing (*please delete one).

7. Address for service:
1091 No 2 Line
RD2
Wanganui 4872
Day time phone No: 063427883
Email: derek.nzced@gmail.com
Signature: D. A. Priest
(Person making submission or person authorised to sign on behalf of person making submission)
Date: 4/6/14

SCANNED

24



Resource Management Act 1991
Submission on a Publicly Notified Plan Change
To The Wanganui District Plan

In accordance with Form 5 - RM (Forms, Fees and Procedure) Regulations 2003

- 4 JUN 2014



RECEIVED

TO: Wanganui District Council, PO Box 637, Wanganui

Name: (print in full) DONALD GEORGE KILPATRICK

This is a submission on Plan Change No. 36 to the Wanganui District Plan. Closing Date: 4.6.14

- 1. (a) ~~I could~~/could not* gain an advantage in trade competition through this submission. (*please delete one).
- (b) I am/~~am not~~* directly affected by an effect of the subject matter of the submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition (*please delete one).

2. The specific provisions of the proposed plan change that my submission relates to:

- 1 Proposed Rural A Zone subdivision rules (Limit of 10 hectares)
- 2 Restriction of one dwelling per 10 hectare lot.

Use additional pages if required

3. My submission is that (Please state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made. Please give your reasons):

- (A) I strongly oppose the imposition of a 10 hectare minimum subdivision for properties that are less than 20 hectares. →
- (B) I also oppose the change that will impose a limit of one dwelling per 10 hectares. →

I seek an amendment as suggested on the attached sheet. Use additional pages if required

4. I seek the following decision from the Council (Give clear details stating what amendments you wish to see made to the Plan Change, and your reasons):

- (A) As per attached sheet. →
- (B) →

Use additional pages if required

5. ~~I do~~/do not* wish to be heard in support of this submission (*please delete one).

6. If others make a similar submission I would/~~would not~~* be prepared to consider presenting a joint case with them at any hearing (*please delete one).

7. Address for service:

372 Blueskin Road
RD 1
WANGANUI

Signature: *D. Kilpatrick*
(Person making submission or person authorised to sign on

Day time phone No: 06 3421772 (behalf of person making submission)

Email: Kilpatrickc@xtra.co.nz Date: 3.6.14

NAME: Donald George Kilpatrick

3(A) The proposal to move to a 10 hectare minimum subdivision is a radical move that will unfairly impact on some landowners in Rural A zones, who will lose rights they have had up to the present.

4(A) While sympathetic to the general aim of the proposed plan change, I believe that aim could still be met if the minimum were to be set at 4 hectares (10 acres) rather than the 10 hectare (25 acres) proposal.

1 hectare blocks generally cease to be agriculturally productive. 4 hectare blocks however, (too big for a pony and too big to mow), remain productive, and this compromise would offer landowners a degree of flexibility, that the change, as proposed, removes entirely,

3(B) A limit of one dwelling per 10 hectares is very restrictive. It means that owners of smaller blocks of land would be unable to deal with changing family housing needs. The Council must retain some discretion here.

4(B) That the general rule should be one dwelling per 4 hectares, but that an exemption should be available if family circumstances warrant it.

D.G. Kilpatrick

3.6.14



Resource Management Act 1991
**Submission on a Publicly Notified Plan Change
 To The Wanganui District Plan**



In accordance with Form 5 - RM (Forms, Fees and Procedure) Regulations 2003

TO: Wanganui District Council, PO Box 637, Wanganui

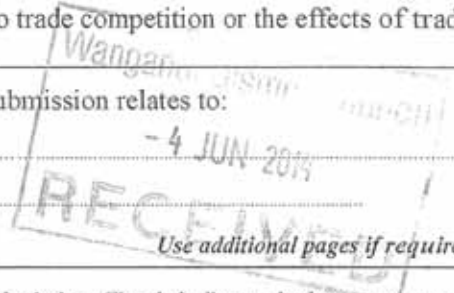
Name: (print in full) WAYNE BAXTER

This is a submission on Plan Change No. 36 to the Wanganui District Plan. Closing Date: 4.6.14

1. (a) I ~~could~~/could not* gain an advantage in trade competition through this submission. (*please delete one).
 (b) I ~~am~~/am not* directly affected by an effect of the subject matter of the submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition (*please delete one).

2. The specific provisions of the proposed plan change that my submission relates to:

11.5.4



Use additional pages if required

3. My submission is that (Please state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made. Please give your reasons):

We oppose the provisions around allotment size in Rural A zone.

Use additional pages if required

4. I seek the following decision from the Council (Give clear details stating what amendments you wish to see made to the Plan Change, and your reasons):

On additional pages - Our wishes are contained in section 4 with the reasons outlined in section 2.

Use additional pages if required

5. I ~~do~~/~~do not~~* wish to be heard in support of this submission (*please delete one).

6. If others make a similar submission I ~~would~~/~~would not~~* be prepared to consider presenting a joint case with them at any hearing (*please delete one).

7. Address for service:

W. B. Baxter

24 DICKENS LANE RD1 WANGANUI

Signature: WB Baxter

(Person making submission or person authorised to sign on behalf of person making submission)

Day time phone No: 021 529 506
3459922

Email: wbaxter@slingshot.co.nz

Date: 3.6.14

CLUMADZ

Submission for Plan 36 – additional pages

Section 2

We are strongly opposed to the proposed District Plan change. We oppose the Plan change on the following three key points;

- A confused and inaccurate Case Study
- A complete lack of economic analysis and its effect
- A misguided attempt to use the preservation of Class 1 & 2 soil types as a means of containing residential spread

1. Background statistics showings trends/land usage

The 2013 Case Study contains data which is confused and inconsistent. Of great concern is the fact that the Plan change has been given life on the result of a very inconsistent and inaccurate Study.

One crucial example of the inconsistency is shown below in these two tables;

	1994 (adjusted)		2013	
	By area (ha)	% of total area	By area (ha)	% of total area
Total Smallholdings	673.51	15.5	358.6	8.2

Extract from Table 2. Areas of Residential and Lifestyle Block Land use

NB Given there were 476 new properties in this period why has the area almost halved ?

	1994 (adjusted)		2013	
	By area (ha)	% of total area	By area (ha)	% of total area
Total Smallholdings	118.3	2.7	518	12

Extract from Table 4. Smallholdings by Area

Sec 3.1.4 of the Proposed plan states "The total area of rural productive land lost to residential or lifestyle blocks has steadily increased over the period to 2013. It now comprises 12% of the Westmere area compared to 2% in 1994". Whilst we are led to understand this is not the driver of the change the instigators of the change must have used objective evidence such as this to promote their cause.

The 1994 map also casts doubt on the accuracy of the comparative data. Presumably that title data was generated from the database; however the high density areas in Mannington Rd, Pickwick Rd, Dickens Lane and Kai Iwi are not shaded as per the legend. Has the correct base data been used to measure the growth from ?

Despite the Study being a reference for decision making it does provide a "waiver" with a statement "that the information in this report is an indicator only of the numbers and extent of small holders in the Westmere area". This statement itself diminishes the reports value.

2. Economic effects

The RMA requires the economic effects to be shown when reasonably practical. This has been glossed over throughout the proposal with general comments such as "protecting soil capacity and versatility will have an economic benefit to wider Wanganui community". There is no objective analysis to measure the amount of economic return or employment brought to the region from the areas under the proposed District Plan change. There is no analysis to demonstrate any potential economic effect if the lifestyle/residential spread was to continue.

Commercial farming entities traditionally have nett average returns across their enterprises of less than 5% on capital. The result is that it is extremely difficult for them to finance the purchase of neighbouring farm blocks when in close proximity to a city. Many of the smaller farming properties within the proposed District Plan change zone are likely to become marginal units as productivity costs continue to increase. Sales of land less than 10 ha can be one option for the small farmer to stay afloat, given higher values of land close to the city. Under this proposal farming platforms will be further depleted by commercial farmers having to sell off 10ha minimum. This decreasing acreage only exacerbates their problem long-term and actually hinders their commercial stability.

For those properties in close proximity to the city their land values will recede (again from a very low base against national figures) which will likely provide some rates relief to the affected land owners. However, to survive presumably WDC requires the same total agricultural rates take from the region...so all other landowners will pay more to cover this...has this been spelt out to the rest of the farming populace ?

An example of wealth destruction that would be effected under this proposal. Our property of 10ha is situated adjacent to the rural/residential area and has a current unimproved land GV of \$950,000 or \$95,000/ha.

Across the fence, a commercial farm entity, has an unimproved land GV of \$1,850,000 or \$26,000/ha for 70 ha. Both properties are of similar soil types and topography.

Presumably Quotable Value have valued our 10 ha as land that has some subdivision potential. If therefore this proposed plan change went ahead our land value would recede to I suspect \$450,000 max. Wealth destruction of \$500,000 on this block of land alone. I suspect there would be several other landowners in the same position some of who may not be left with any equity in their property as a consequence of the proposed change

The Westmere portion of the Rural A zone has been rightly pointed out as long being an area of choice for many ratepayers despite the availability of cheaper land in alternative areas. Many of those properties now hold high value homes. Has there been an evaluation of homeowners' (investors) interest in building the same value homes in other less desirable semi rural areas? This is a possible indirect economic consequence for the local struggling building industry.

If we don't have a handle on the economics effects of this proposal it would appear extremely foolhardy to make any changes regards subdivision and reduced allotment sizes.

3. Land classification and usage

There is a comment that agriculture is the backbone of the Wanganui region. It possibly is, however the agricultural economic wealth is spread widely in the Wanganui hinterland and is not dependant on a very small parcel of Westmere Rural A land.

Whilst some of our best soils are within this subject area it also contains large amounts of light sandy soils and topography that is unsuitable for higher valued farming. Obviously these Class 1 & 2 soils have always been available for higher valued farming but there has been minimal uptake and certainly no evidence of long-term success .

The benefits for the region from the proposed District Plan change are not clearly spelt out. There is no real demonstrated economic basis for change at this time.

4. Transition from Town to Country

New Zealand's cities are generally buffered from agricultural land by lifestyle blocks which then become residential as the city grows. The Rural A proposal for Westmere being contrary to this by pushing intending purchasers into either;

- areas further from the city (doing little for the regions carbon footprint with extended , car running)
- least preferred localities or
- larger than preferred holdings for many lifestylers

With changing lifestyles purchasers are graphically demonstrating they want smaller parcels and not bigger. We believe smaller parcels can co -exist in the rural zones with some clear Council conditions that protect the rural amenity values. That may require some innovative planning.

Section 4

We wish to see one of the following amendments/options made;

- Retain the Status Quo
- Move the the Rural A Zone further out from the City boundary towards Kai Iwi thus retaining the transition from town to the country perspective whilst preserving the value of closer higher valued rural properties
- Allow a 5 year lead in thus giving property owners time to take action to minimize their wealth loss.

Resource Management Act 1991

Submission on a Publicly Notified Plan Change to the Wanganui District Plan

In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003

To: Wanganui District Council
PO Box 637
Wanganui

Name: Horizons Regional Council

Contact Person: Barry Gilliland, Senior Policy Analyst

This is a submission on: Proposed Plan Change 36 (Rural) and 37 (Papakainga)

1. I **could not** gain an advantage in trade competition through this submission.
 2. The specific provisions of the proposed plan change that my submission relates to are outlined in **Annex A**.
 3. My submission points are detailed in **Annex A**.
 4. The decisions sought from Wanganui District Council are detailed in **Annex A**.
 5. I **do** wish to be heard in support of this submission.
 6. I would welcome any opportunity to attend informal or formal pre-hearing meetings with Wanganui District Council and other parties to discuss points of contention.
 7. If others make a similar submission I **would** be prepared to consider presenting a joint case with them to any hearing.
 8. **Address for Service:** Horizons Regional Council
Private Bag 11025
Palmerston North
- Day time phone No:** (06) 9522 904
Email: barry.gilliland@horizons.govt.nz

Signed:



Nic Peet
GROUP MANAGER STRATEGY AND REGULATION

Dated: 4 June 2014

ANNEX A

Details of Horizons Regional Council submission to Wanganui District Plan Proposed Plan Change 36 (Rural)

HRC – Horizons Regional Council
WDC – Wanganui District Council

BACKGROUND

The Proposed One Plan, HRC's Regional Policy Statement and Regional Plan, provides the basis for this submission. All appeals have been resolved either by decisions from the Environment Court or approval of mediation agreements by the Environment Court. As at 4 June 2014, it has not been made operative, but it has legal effect.

The provisions of district plans must give effect to the Regional Policy Statement and WDC's response to this requirement is the focus of this submission.

PROPOSED PLAN CHANGE 36 (RURAL)

HRC supports the intent of Proposed Plan Change 36 to mitigate alienation of Class I and II (versatile) soils. The key provisions in the Proposed One Plan relating versatile soils are found in Chapter 3. Objective 3-1C and Policies 3-3B are relevant considerations.

It is considered that the approach taken in Proposed Plan Change 36 to safeguard Class 1 and 2 soils from alienation generally implements the provisions of the Regional Policy Statement in a way that is fit for purpose for purpose for Wanganui District.

The interrelationship between rural development and HRC's discharges of domestic wastewater rules in the Proposed One Plan has also been evaluated. It is submitted that a cross reference guidance note may be helpful for plan users so they are aware of the additional requirements in the Proposed One Plan. The key provisions relating to new and upgraded discharges of domestic wastewater are Rules 13-11 and 13-12.

The points identified in this submission are intended to provide support for the approaches taken in Proposed Plan Change 36 and where appropriate seek amendments to clarify and make the provisions more certain.

Proposed Plan Change 36 Provision submission relates to:	Submission Point	Decision sought [Proposed Plan Change text in italics with deletions shown in strikethrough and additions shown in underline]
3.1 ISSUES		
Rural A zone	Issue statement is supported. The issue is consistent with the intent of versatile soil provisions HRC Regional Policy Statement (Part 1 Proposed One Plan).	That when WDC makes decisions on submissions, the intent of the issue be retained and any amendments be restricted to those that improve clarity.
3.2 OBJECTIVES		
Objectives 3.2.1 3.2.2 3.2.4 3.2.5	The objectives are supported. The objectives are considered appropriate to implement the relevant provisions in HRC's Regional Policy Statement (Chapter 3, Part 1 Proposed One Plan).	That when WDC makes decisions on submissions, the intent of the objectives be retained and any amendments be restricted to those that improve clarity and certainty.
3.3 POLICIES		
Policies 3.3.1 3.3.4	These policies are supported. The policies are considered appropriate to implement the relevant provisions in HRC's Regional Policy Statement (Chapter 3, Part 1 Proposed One Plan).	That when WDC makes decisions on submissions, the intent of these policies be retained and any amendments be restricted to those that improve clarity and certainty.
Rural A Zone 3.3.6 3.3.7 3.3.8	These policies are supported. The policies are considered appropriate to implement the relevant provisions in HRC's Regional Policy Statement (Chapter 3, Part 1 Proposed One Plan).	That when WDC makes decisions on submissions, the intent of these policies be retained and any amendments be restricted to those that improve clarity and certainty.
3.4 RULES – RURAL A ZONE		
3.4.1 Permitted Activities	<p>The rule is supported. The rule is considered appropriate to implement the relevant provisions in HRC's Regional Policy Statement (Chapter 3, Part 1 Proposed One Plan).</p> <p>It is noted that resource users building a dwelling under Rule 3.4.1 will also need to be aware of the requirements of HRC's rules relating to discharges of domestic wastewater.</p>	<p>That when WDC makes decisions on submissions, the intent of this rule be retained and any amendments be restricted to those that improve clarity and certainty.</p> <p>That a guidance note be added to the rule or the performance standards advising plan users of the requirements of Proposed One Plan Rule 13-11 (new and upgraded discharges of domestic wastewater).</p>

Proposed Plan Change 36 Provision submission relates to:	Submission Point	Decision sought [Proposed Plan Change text in italics with deletions shown in strikethrough and additions shown in underline]
3.4.2 Restricted Discretionary Activities	<p>The rule is supported. The rule is considered appropriate to implement the relevant provisions in HRC's Regional Policy Statement (Chapter 3, Part 1 Proposed One Plan), except as detailed in the submission below.</p> <p>HRC submits that clause (c) which allows creation of one allotment with a site area of between 2,500m² and 5,000m² may result in a subsequent issue with discharge of domestic wastewater if a dwelling is proposed. It is assumed that Clause (c) allows the one-off creation of one of these allotments at any time in the future since all sites may be presumed to be legally existing as at 1 May 2014.</p> <p>Proposed One Plan Permitted Activity Rule 13-11 specifies a minimum lot size of 5,000m² for <u>new</u> land parcels where wastewater is to be disposed to land rather than being reticulated. Discharges of domestic wastewater that cannot comply with this activity standard are treated as restricted discretionary activities with the risk that consent may not be granted, e.g., where the slope of the land may mean that all of the site can be considered suitable for an effluent disposal field.</p> <p>It is noted that resource users intending to subdivide building a dwelling under Rule 3.4.2 will also need to be aware of the requirements of HRC's rules relating to discharges of domestic wastewater.</p>	<p>That when WDC makes decisions on submissions, the intent of this rule be retained and any amendments be restricted to those that improve clarity and certainty.</p> <p>That Clause (c) be amended to provide for a minimum allotment size of 5,000m² and a guidance note be added to the rule or the performance standards advising plan users of the requirements of Proposed One Plan Rule 13-11 (New and upgraded discharges of domestic wastewater).</p>
3.4.3 Discretionary Activities	<p>The rule is supported. The rule is considered appropriate to implement the relevant provisions in HRC's Regional Policy Statement (Chapter 3, Part 1 Proposed One Plan).</p>	<p>That when WDC makes decisions on submissions, the intent of this rule be retained and any amendments be restricted to those that improve clarity and certainty.</p>
3.4.4 Non-Complying Activities	<p>The rule is supported. The rule is considered appropriate to implement the relevant provisions in HRC's Regional Policy Statement (Chapter 3, Part 1 Proposed One Plan).</p>	<p>That when WDC makes decisions on submissions, the intent of this rule be retained and any amendments be restricted to those that improve clarity and certainty.</p>

Proposed Plan Change 36 Provision submission relates to:	Submission Point	Decision sought (Proposed Plan Change text in italics with deletions shown in strikethrough and additions shown in underline)
3.4 RULES – RURAL C ZONE		
3.8.1 Permitted Activities	<p>The rule is supported.</p> <p>It is noted that resource users building a dwelling under Rule 3.8.1 will also need to be aware of the requirements of HRC's rules relating to discharges of domestic wastewater.</p>	<p>That a guidance note be added to the rule or the performance standards advising plan users of the requirements of Proposed One Plan Rule 13-11 (new and upgraded discharges of domestic wastewater).</p>
CONSEQUENTIAL CHANGES AND OTHER RELIEF		
Consequential Changes and other relief as part of decisions		<p>For all submission points HRC also seeks:</p> <ol style="list-style-type: none"> 1. Alternative amendments or relief as may be necessary or appropriate to give effect to the decisions sought; and 2. Any consequential amendments or relief as may be necessary or appropriate to give effect to the decisions sought.

Details of Horizons Regional Council submission to Wanganui District Plan Proposed Plan Change 37 (Papakāinga)

PROPOSED PLAN CHANGE 37 (PAPAKAINGA)

HRC supports the objectives of Proposed Plan Change 37, provided matters such as flood hazard are managed effectively. This is the focus of HRC's submission.

Proposed Plan Change 37 Provision Submission Relates to	Submission Point	Decision sought [Proposed Plan Change text in italics with deletions shown in strikethrough and additions shown in underline]
RULES		
<p>Rules 2.8.1 and 2.8.2</p> <p>Compliance with Performance Standards and District-wide Rules</p>	<p>It is not clear how the Permitted Activity and Restricted Discretionary Activity Rules will work in terms of flood hazard mitigation. On the one hand it is stated that "activities must comply with Performance Standards and District-wide Rules," but on the other hand compliance appears to me determined at the "outer boundary." On the face of things, this appears uncertain and it is submitted that consideration be given to providing redrafting to clarify this.</p> <p>HRC would be concerned if zone requirements for flood mitigation were not required for developments where flood hazard is identified as an issue in the District Plan.</p>	<p>That when WDC makes decisions on submissions, that the requirements of the rules with respect to Performance Standards and District-wide rules be clarified for the purpose of certainty.</p>
<p>Consequential changes and other relief as part of decisions</p>		<p>For this submission point HRC also seeks:</p> <ol style="list-style-type: none"> 1. Alternative amendments or relief as may be necessary or appropriate to give effect to the decisions sought; and 2. Any consequential amendments or relief as may be necessary or appropriate to give effect to the decisions sought.